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Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

May 10, 2018

Dear Ms. Townsend,

Please accept this letter as feedback on the CWSRF Draft IUP Workshop held on 4/27/18 in greater Sacramento. Hidden Valley Lake Community Services District (HVLCSD) has applied for GPR funding (project 39393). As mentioned in the tenth slide of the workshop presentation, there have been a few significant changes to the DFA CWSRF process. HVLCSD would like to comment on three areas of this process:

1. The level of preferential treatment given to SDAC and DAC puts the small water agency with higher MHI at a disadvantage. Is this the intent? In the US EPA’s National Program Manager Guidance Overview for FFY 2014, our project meets Strategic Goals 2, 3 and 4. Specifically, we are “Protecting America’s Waters” by reducing diversions from Putah Creek (a tributary to the Sacramento River), “Cleaning Up Communities and Advancing Sustainable Development” by installing the newest technology in water meters, “Ensuring the Safety of Chemicals and Preventing Pollution” by removing old meters made of a metal alloy comprised of 8% lead. HVLCSD cannot reap the benefit of economies of scale given our size of 2500 connections, and are therefore unable to make this project a reality.

2. Lack of responsiveness, expertise, and accuracy of DFA CWSRF staff has put HVLCSD at a disadvantage. In Section V, Item C of the IUP (pg 37), goals include “provide good customer service”, “clearly communicate”, and “ensure staff is well trained”. We have also learned that although there is a documented spike in the volume of applications, DFA CWSRF is not authorized to hire staff to meet this demand. It appears your staff’s workload precludes them from meeting these goals in your IUP.

3. Partial funding is listed as a change in your process. HVLCSD has seen no evidence of a willingness on DFA CWSRF part to partially fund our project, which we would welcome.

In summary, the life of our project would have reduced 20 AF of Putah Creek diversions, replaced water meters, of which 55% contain a metal alloy made of 8% lead, and strengthened the sustainability of our community that has recently endured the devastating effects of wildfire and ensuing housing crisis. We implore the Board of Directors to reconsider the priorities placed on other communities above HVLCSD, and at least offer partial funding to this crucial project.

Sincerely,

Ályssa Gordon