



Hidden Valley Lake Community Services District

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June 26, 2014

Ms. Felicia Marcus, Chair
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Subject: Proposed drought related emergency regulations for curtailment of diversions to protect senior water rights

On behalf of the Hidden Valley Lake Community Services District (District) I would like to take a few minutes of your time to express our concerns regarding the State Water Resources Control Board's (State Water Board) proposed "drought related emergency regulations for curtailment of diversions to protect senior water rights", scheduled to be heard at the July 1, 2014 State Water Board meeting.

The District provides water and sewer service to 6,000 residents in the Hidden Valley Lake Community, located in southern Lake County and within the headwaters of the Putah Creek drainage. While we understand the rationale for the proposed emergency regulations, we believe the regulations, as currently crafted, will unduly punish those entities that through favorable geography and/or significant water supply reliability investments are less affected by the ongoing drought, by subjecting them to remedies that are more appropriately directed toward others. Remedies that when misapplied, result in unnecessary significant economic impacts.

We respect the State Water Board's desire to move swiftly to address the drought emergency. We only ask for the same - the opportunity for those of us who still have a legitimate water supply to expeditiously present our case as to why we should be exempt from all or portions of the proposed emergency regulations/curtailment order, and if deemed valid, swift confirmation by the State Water Board.

The proposed emergency regulations include a provision for the reconsideration of curtailment orders within section 875(f), as well as a provision for working collaboratively at the local level to allocate limited water supplies - section 878.3 (Alternative Water Sharing Agreements). We strongly support the inclusion of these two provisions but urge the State Water Board to describe them more fully in the text of the proposed emergency regulations. What for



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example, would an organization need to do, what data would it need to provide for reconsideration of a curtailment order? Similarly, what is the State Water Board expectation, and more specifically, staff expectation with respect to the content and scope of an Alternative Water Sharing Agreement?

We are concerned that unless additional guidance is provided within the proposed emergency regulations, there will be confusion and ultimately costly delays for those entities seeking reconsideration of a curtailment order or approval of an Alternative Water Sharing Agreement.

Sincerely,

A handwritten signature in blue ink, appearing to read "Roland A. Sanford".

Roland A. Sanford
General Manager

Cc: Assemblymember Mariko Yamada, District 4
Lake County Supervisor Jim Comstock
Cindy Spears, Hidden Valley Lake Association General Manager
Paula Whealen, Wagner & Bonsignore Consulting Civil Engineers
Cindy Tuck, Association of California Water Agencies