



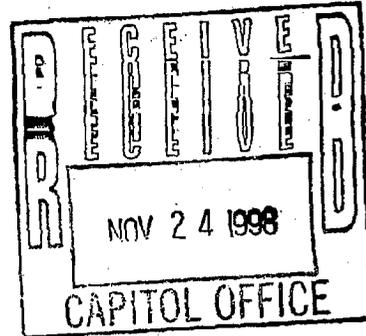
MCKINLEYVILLE COMMUNITY SERVICES DISTRICT

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November 19, 1998

The Honorable Virginia Strom-Martin
California State Assembly
State Capital Building, Room 4098
Sacramento, CA 95814



Dear Assembly Member Strom-Martin:

On November 12, 1998, the McKinleyville Community Services District Board of Directors unanimously voted to express their concern and strong opposition to the indiscriminate manner in which the current draft of the Cal/Fed Water Use Efficiency Program is proposed to be implemented. The Cal/Fed document calls for any water purveyor in the State who is required to submit an Urban Water Management Plan, to abide by the new and financially burdensome conditions of the proposed program. No distinction is made as to whether a specific purveyor/agency is within the Cal/Fed service area, is in any way dependent upon Cal/Fed, or whether the proposed conservation requirements are economically, environmentally, or practically feasible within the purveyor/agency's jurisdiction.

The community we serve is committed to the wise use of water, both in current practice and in our strategic planning. We have an outstanding record of modest water use – a practice which will continue to improve as more new construction and remodeling fall under the uniform construction codes which apply to water conservation. The McKinleyville Community Services District examined economic viability of conservation measures in 1993 to satisfy one of the State Revolving Fund's requirements for securing a State Water Resources Control Board sewer system loan. MCSD's 1993 cost/benefit evaluation showed that eleven of the eighteen Best Management Practices (BMP's) were viable for our service area. The other seven BMP's had negative cost benefit ratios, using the State's own model. The District adopted an ordinance amending their Rules and Regulations to add Water Conservation Standards in August of 1994.

We are convinced that an additional layer of regulation and the bureaucracy that will surely follow are not necessary for areas like ours which have absolutely no connection to the Cal/Fed process. We ask you support to limit implementation of the proposed plan and regulations to those agencies which directly benefit from Cal/Fed. We are certain that if the program is implemented as broadly as is currently proposed, major funding will have to be appropriated to assure proper execution and to offset the financial impacts to our community.

We are alarmed that Cal/Fed has been moving, in our opinion, very quietly on the development of this proposal. We had no idea anything of such momentous import to our agency and community was proposed until, thankfully, we received a clear explanation from people familiar with the proposal and the inherent implications to small agencies such as ours. A major reason for our ignorance is that the conservation proposal is buried in a very complex policy and planning

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framework. Its impacts have not been specifically explained to agencies like ours, which do not have the resources to follow the many elements of a huge undertaking like Cal/Fed.

The Cal/Fed process claims to represent all "stakeholders". While our agency is not a participant in the Cal/Fed process, we certainly constitute a "stakeholder" as the current draft of the Cal/Fed Conservation Proposal is proposed to be implemented. We ask your support in urging Cal/Fed to keep agencies like ours apprised of proposals with impacts which may not seem apparent to those of us not in the Cal/Fed service area and not directly connected to the process.

We have been told that the latest draft of the Cal/Fed Conservation Proposal contains verbiage to the effect that the proposal will be applied to water suppliers "hydrologically or institutionally connected to the Bay-Delta watershed". We are not clear what interpretation may be made of this statement, nor whether the statement will survive edits and revisions of the draft document. We feel strongly however that the North Coast's physical and hydrologic detachment from the Cal/Fed project area suggests there is no reasonable rationale for applying Cal/Fed requirements to the North Coast. We therefore further request that you consider excluding the North Coast from the Cal/Fed process when this proposal is reviewed by the Legislature.

Sincerely,



Ben Shepherd
President, Board of Directors

cc: Lester Snow - Executive Director Cal/Fed
Steve Hall - Executive Director ACWA
Catherine Smith - Executive Director CSDA
Sen. Maurice Johannessen - CA State Senate
Mary Lou Cotton - Kern County Water Agency
Art Bolli, HBMWD
Bruce Buel, MCSD District Manager

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