

# SAN GABRIEL VALLEY WATER COMPANY

June 25, 2018

*Via electronic mail (mpestrella@dpw.lacounty.gov)*

Department of Public Works  
Los Angeles County  
Attn: Mark Pestrella, Director  
900 South Fremont Avenue  
Alhambra, CA 91803

Subject: Comments to Draft Program Elements to the Safe, Clean Water Program

Dear Mr. Pimentel:

On behalf of San Gabriel Valley Water Company ("San Gabriel"), I am writing to respectfully offer comments on the Draft Program Elements ("Program Elements") to the Safe, Clean Water Program. San Gabriel provides water utility service to a population of over 481,000 in the its Los Angeles County and Fontana Water Company division service areas and operates under the regulatory jurisdiction of the California Public Utilities Commission ("CPUC").

The following are San Gabriel's comments and questions relating to the Proposed Review and Recommendations:

1. Section IV subsection A of the Program Elements provides that under the Technical Resources Program the District will provide Technical Assistance Teams and Watershed Coordinators that will engage in a number of activities that complete Feasibility Studies. While selecting the Technical Assistance Teams and Watershed Coordinators it is imperative that the District defer if not confer with Local Governments and the community in the selection of these teams and individuals. This is also true when selecting members of the other committees mentioned throughout the Program Elements. The local communities are best equipped to select individuals with critical knowledge of the local community and watershed.

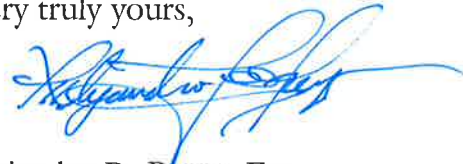
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2. Section IV subsection E provides that Project Applicants must secure a Municipal sponsor/partner to receive funding through the Infrastructure Program. In the event where a Project Applicant's proposed Project provides multi-benefits for multiple municipalities, how will a municipal sponsor be selected especially if multiple municipalities are competing for compliance under the MS4 Program?
3. Priority should also be given to the Project Applicant, as opposed to the Municipality, when outlining the roles and responsibilities in execution of a memorandum of understanding.
4. The storm water tax methodology needs to be fair and reasonable and adjusted for disadvantaged communities who are subject to increased costs and taxes.
5. San Gabriel joins the Main San Gabriel Basin Watermaster's comments to the extent that the Safe, Clean Water Program does not interfere with adjudicated groundwater rights by intercepting water that is already infiltrated elsewhere, potentially impacting existing groundwater recharge calculations and adjudicated supplies.

Thank you for the opportunity to participate in the County's Safe, Clean, Water LA, Stakeholder Advisory Committee. So that we may remain informed regarding the progress of the Program Elements and the Safe, Clean Water Program, all further notices, Draft Rulemaking, and Final Rulemaking should be sent to me at the following address:

Alejandro R. Reyes, Esq.  
Regulatory Compliance Counsel  
San Gabriel Valley Water Company  
Post Office Box 6010  
El Monte, CA 91734-2010

Very truly yours,



Alejandro R. Reyes, Esq.  
Regulatory Compliance Counsel

ARR:dg  
cc: Rachel Roque (rroque@cnrgcalifornia.com)