(6/20/17) Board Meeting FFY 2017 CWSRF IUP Deadline: 5/22/17 by 12 noon

Lewiston Community Services District 130 Texas Avenue, P.O. Box 164 Lewiston, CA 96052



Jeanine Townsend, Clerk to the Board State Water Resources Control Board commentletters@waterboards.ca.gov 1001 I Street, 24th Floor Sacramento, CA 95814

Dear State Water Resources Control Board,

Subject:

Comment Letter - June 20, 2017 Board Meeting FFY 2017

CWSRF IUP

BACKGROUND

Lewiston is located in Trinity County immediately downstream of Lewiston Dam and along the banks of the Trinity River, a federal and state designated Wild and Scenic River. The original wastewater collection and treatment systems for the various communities of Lewiston were constructed circa 1957 along with the Lewiston and Trinity Dams as part of the Central Valley Project. Three independent wastewater systems currently serve the area and all have met the end of their useful services lives. Funding is needed to leverage community support to construct a sustainable regional wastewater collection, treatment and disposal project.

On February 26, 2015, the California State Water Resources Control Board issued a planning grant (Small Community Grant Project No. C-06-8048-110) to the Lewiston Community Services District. Since then the District has worked diligently with the SWRCB Division of Financial Assistance (DFA), Office of Enforcement (OOE), North Coast Regional Water Quality Control Board (NCRWQCB), and Division of Drinking Water (DDW) to prepare the Project Report and submit the CWSRF construction funding application. The project has garnered unprecedented support from members of the communities as well as letters of support from responsible regulatory agencies, Trinity County Board of Supervisors, and Congressman Jared Huffman. Members of the Lewiston Community Services District, Lewiston Park Mutual Water Company, and Trinity County Board of Supervisors met with SWRCB staff from DFA, OOE, NCRWQCB, and DDW on January 17, 2017 to review and approve the recommended project so that it could proceed with securing CWSRF funding, which was submitted on March 5, 2017. In addition, the project now appears to have gained financial backing from the USDA Rural Utility Service.

Lewiston community members has since forged drinking water and sewer agreements to address consolidating these three systems, Lewiston Park Mutual Water Company (LPMWC) (167 services) and Trinity Dam Mobile Home Park (TDMHP) (45 services) wastewater collection, treatment, and disposal systems under the Lewiston Community Services District (LCSD) (47 services), into a single regional project that when funded adequately, will provide a sustainable long term solution to provide proper wastewater collection, treatment, and disposal for many years. The total project cost is estimated at \$16.8M. The majority of the project is anticipated to be funded through a grant from the CWSRF. A favorable funding application was submitted on March 16, 2017 to USDA Rural Utility Service. In addition, funding requests are planned to be to Housing and Urban Development Community Development Block Grant and Department of Water Resources Integrated Regional Water Management. It is important to note that through value engineering the proposed project was able to remain under the maximum \$60,000 grant per connection as noted on Table 4.c in the May 2, 2017 revised draft of the 2017-2018 IUP.

Thus our primary comment is to ensure that the SWRCB continues to emphasize the need for grant funding of regional consolidation and septic to sewer projects realizing that the economy of scale is a challenging hurdle to overcome. DFA staff needs the latitude to recognize the value in some projects that would otherwise be impossible to fund without CWSRF and Proposition 1.

We believe that all Lewiston community members appreciate the planning grant funding that has brought this project to fruition and look forward to constructing a wastewater collection, treatment, and disposal system that will properly serve the residents and protect the environment for all to enjoy.

District staff look forward to continue the professional working relationship with staff at the SWRCB DFA, NCRWQCB, OOE, and DDW to bring this project to fruition. Please call with any comments.

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Sincerely,

Mel Deardorff President, Board of Directors

TW/MD

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