

California State Water Resources Control Board

Financial Management Plan

Keeler Community Services District

Keeler, California
June 2023

Prepared for:

State Water Resources Control Board – Division of Financial Assistance
Division of Drinking Water
Sacramento, California

Prepared by:

Provost & Pritchard Consulting Group
455 W. Fir Avenue, Clovis, California 93611

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Report Prepared for:

State Water Resources Control Board – Division of Financial Assistance
Division of Drinking Water
1001 I Street, 16th Floor
Sacramento, California 95814

Contact:

Juana Tellez, Project Manager, Division of Financial Assistance
(916) 341-5955

Report Prepared by:

Provost & Pritchard Consulting Group

Contact:

Stephen Spencer, Administrator Program Manager, Provost & Pritchard Consulting Group
(559) 449-2700

Funding for this project has been provided in full or in part under the Safe and Affordable Funding for Equity and Resiliency (SAFER) Drinking Water Program through an agreement with the State Water Resources Control Board. The contents of this document do not necessarily reflect the views and policies of the foregoing, nor does mention of trade names or commercial products constitute endorsement or recommendation for use.

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Abbreviations

CAEP.....	Community Accountability and Engagement Plan
CDP.....	Census Designated Place
CRWA.....	California Rural Water Association
DDW	Division of Drinking Water
DWS.....	Designated Water System
GSWC.....	Golden State Water Company
KCSD.....	Keeler Community Services District
KVFD	Keeler Volunteer Fire Department
P&P	Provost & Pritchard Consulting Group
SAFER.....	Safe and Affordable Funding for Equity and Resilience
SWRCB.....	State Water Resources Control Board
UDWN	Urgent Drinking Water Needs Program

1 Introduction

The purpose of this document is to establish a protocol for the Water System Administrator team to manage the finances of the Keeler Community Service District (KCSD) including identification of the person or entity responsible for collecting KCSD customer payments and paying KCSD expenses. This document primarily focuses on how the Administrator will manage the KCSD finances.

2 Organizational Management

2.1 Designated Water System

KCSD's system is identified as water system No. 1400036 under the jurisdiction of the State's Division of Drinking Water. KCSD was established in 1984 and maintains the drinking water system for the Keeler community, a Census Designated Place (CDP) in Inyo County. It is located on the east shore of Owens Lake adjacent to California State Route 136. KCSD serves a population of approximately 65 residents through 58 connections, of which 54 are residential and four are commercial. A total of 91 service connections are available for future growth.

KCSD is a Community Services District, formed and operating pursuant to California Government Code §§ 61000 et seq. KCSD is governed by a five-member board of directors who are elected to serve by the voters in the community. Board members serve four-year terms. Currently there is at least one vacancy on the Board of Directors. There are no regular staff members employed directly by the KCSD.

Existing KCSD bylaws call for four regular Board meetings each year held in January, April, July, and October. Prior to the Administrative Order, the Board of Directors was responsible for the administration and management of all KCSD's financial matters. The Board's financial functions while the Administrative Order remains effective will be advisory given the full-scope nature of the Administrative Order. The Administrator anticipates providing updates to the Board and receiving input on Administrator activities (financial and otherwise) at the Board's regular quarterly meetings. The Board may continue to meet without the Administrator present; however, the Board will not have any direct authority to make binding decisions regarding financial matters.

2.2 Administrative Order Authorities

The Administrative Order is attached as Attachment 1.

The Administrator will prepare the following documents once appointed:

- Governance and Management Plan
- Financial Management Plan (this document)
- Emergency Response Plan
- Operation and Maintenance Plan
- Community Accountability and Engagement Plan (CAEP)

These plans are designed to meet the State's Technical, Managerial and Financial requirements to be eligible for future funding, including funding for capital improvements and operation and maintenance funding.

Once these plans have been reviewed and approved, the Administrator will implement each plan and begin building a sustainable organization for the designated water system.

Simultaneously, the Administrator will assist the designated water system with contracting with a licensed operator to provide field services, including sample collection, operational data collection, and minor maintenance. Analytical and operational data will initially be used to bring the designated water system into compliance with State standards for drinking water. Ultimately the operator will follow the Operation and Maintenance Plan once it is finalized and published.

The CAEP will include quarterly public outreach meetings to inform the community regarding the activities of the Administrator and solicit public participation with the management of the designated water system.

Other activities to be completed by the Administrator include an initial rate study and review of the system's financial health, and then initiating a Proposition 218 process to adopt the new water rate, if appropriate.

Within 18 months of the Administrator Order being issued to the designated water system, the Administrator will prepare a Post-Administrator Drinking Water Service Plan. This document will provide the roadmap for sustainable water system operation in the future once the Administrator's work is complete.

2.3 Administrator Team Roles and Responsibilities

The following subsections list each member of the Administrator project team along with his or her general responsibilities. **Figure 2-1** presents an organization chart for the project team for reference.

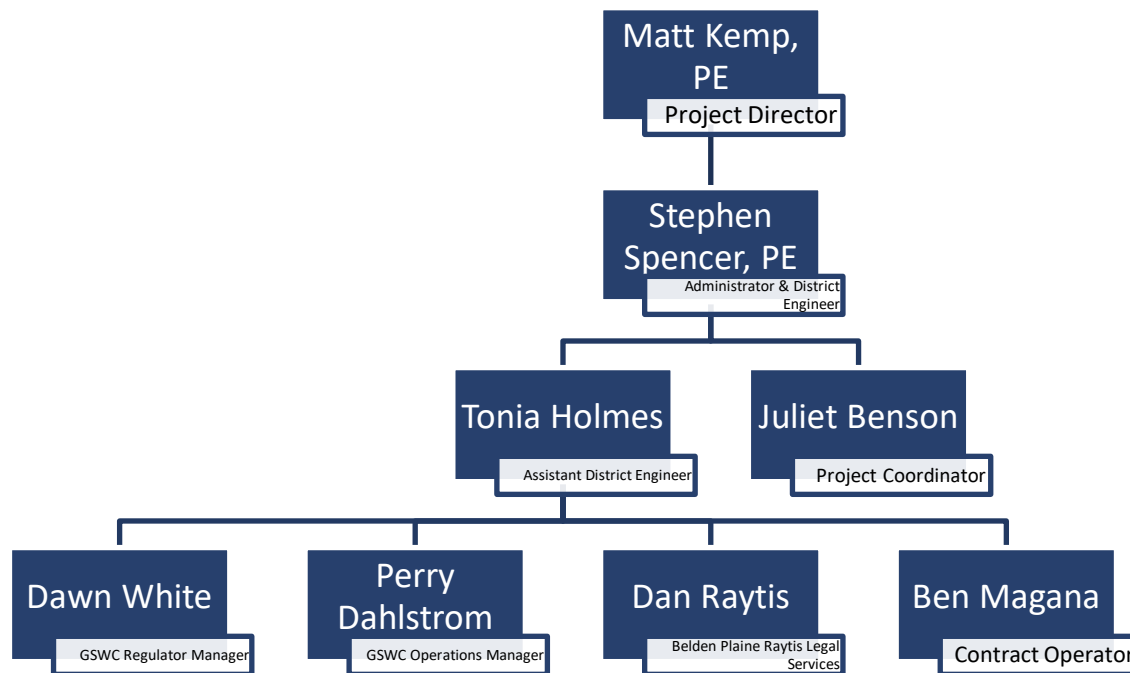


Figure 2-1: Project Team Organization Chart

2.3.1 Administrator

Matt Kemp, Provost & Pritchard – Project Director – responsible for executing grant agreements between the California State Water Board and Provost & Pritchard.

Stephen Spencer, Provost & Pritchard – Administrator and District Engineer – Responsible for the overall administration of KCSD, including signing Grant-related documents.

Tonia Holmes, Provost & Pritchard – Assistant District Engineer – responsible for operations management coordination.

Juliet Benson, Provost & Pritchard – Project Coordinator – responsible for grant-related correspondence and reimbursement request preparation, and responsible for financial management coordination.

2.3.2 Operations Management

In addition to the Provost & Pritchard (P&P) administrative team listed above, the following individuals make up the Operations Management Team:

Dawn White, Golden State Water Company – Regulatory Manager – responsible for scheduling regulatory sampling, preparing required reports, and coordinating with the contract operator. Contact: Dawn.White@gswater.com

Perry Dahlstrom, Golden State Water Company – Operations Manager – responsible for schedule operations and maintenance with the contract operator. Contact: Perry.Dahlstrom@gswater.com

An operations plan and an emergency response plan were prepared under separate cover to provide guidance for KCSD to comply with State requirements for community drinking water systems.

2.3.3 Financial Management

In addition to the P&P administrative team listed above, the following individuals make up the Financial Management Team:

Catherine Hopkins, Provost & Pritchard – Accounting Support – responsible for tracking KCSD’s finances, including recording payments from KCSD’s customers and tracking system expenses. For expenses, Ms. Hopkins submits a payment request to the Inyo County Auditor and the Auditor works with the County Treasurer to issue payment (see **Section 3.5** for additional details).

Regina Cullado, Golden State Water Company – responsible for billing and collections for the Keeler community. Regina leads the billing team at Golden State Water Company (GSWC) and will direct how billing and payments are handled and recorded. Contact: Regina.Cullado@gswater.com

2.3.4 Designated Water System Contract Services

KCSD does not currently have a written agreement with Inyo County for the financial services that the County currently provides to KCSD, as described in this document. However, the County has prepared a draft document to formalize the relationship with KCSD and other small districts for whom the County provides similar services. A copy of that draft document is included in Attachment 2, for reference. The document indicates that the County’s Auditor-Controller will provide the following services:

1. Receipt and review of Authorization for Payment and invoices.
2. Issuance of warrant for payment to Vendor as requested.
3. Warrant cancellations and reissuance.
4. Process submitted journal entries for interdepartmental billings and/or corrections to budget, as well as providing assistance in creating journal entry templates upon request by the district.
5. Provide reports and data to help resolve billing/payment issues.
6. Report DE542 to State of California for all sole proprietors, according to state law and requirements.
7. Year-end closing process, which includes processing accruals.

8. Create annual 1099 Reporting on behalf of district, including mailing to vendor and reporting to the Internal Revenue Service.

County contacts:

- Christie Martindale, Assistant Auditor Controller, (760) 878-0253, cmartindale@inyocounty.us
- Alisha McMurtrie, Treasurer, (760) 878-0253, inyottc@inyocounty.us

Other contract services for KCSD are listed in **Table 2-1**.

Table 2-1: Contract Services for KCSD

Contractor	Service	Contact
Ben Magana	Licensed contract operator - responsible for field operations and maintenance at KCSD, including sample collection and delivery to the analytical laboratory	Ben Magana (559) 544-4059 Benny_magana@icloud.com
Kile's H2Ooperations	Licensed contract operator – available for emergency response if Ben Magana is not available	Caleb Kile (760) 258-7220 Kilesh2operations@gmail.com
Pace Laboratories	Analytical laboratory	
McMor Water Services Co.	Licensed contract operator – available for emergency response if Ben Magana is not available	Gary Lumpkins (661) 301-1791 gary@skookumh2o.com

2.4 Communications

As a full-scope administrator, the Administrator will exercise total and complete managerial control over the KCSD water system during the term of the Administrative Order. Notwithstanding this designation, the Administrator will engage with community members during the process through the development and implementation of a CAEP in compliance with the Administrator Policy Handbook.

2.4.1 Public and Customers

Public meetings will be held in accordance with the requirements of the Administrator Policy Handbook. As a community services district, the number and frequency of board meetings is governed by the KCSD's Bylaws (and/or other governing documents). KCSD's bylaws previously called for monthly meetings, but in anticipation of the Administrator assignment, the Board revised the bylaws to shift to quarterly meetings (January, April, July, and October) to match the

public meeting requirements of the Administrator Policy Handbook. Therefore, the Administrator will comply with the requirements of the Administrator Policy Handbook by conducting the following:

- Public meetings shall be held at least once every three months. KCSD’s Board will be invited to participate.
- At each public meeting, the administrator shall provide the Association members with the following:
 - An update on the performance of the designated water system;
 - An overview of the designated water system’s financial health;
 - An update on major projects or plans;
 - An update on any changes to water rates; and
 - An update on any other significant matters related to the designated water system.
- The Administrator will notice a public meeting for community residents and property owners prior to taking any of the following actions:
 - Development of Community Accountability and Engagement Plan
 - Development of Post-Administrator Drinking Water Service Plan
 - Establishing a final operating budget;
 - Entering into significant long-term contracts;
 - Approving and/or entering into contracts for significant planning projects or infrastructure improvements,
 - Entering into significant financing commitments, including any financing contracts with the State Water Board,
 - Adoption of final system policies, and
 - Altering water rates and fees.

Public meetings will be held in person at the Keeler Volunteer Fire Department (KVFD) fire house in Keeler at 165 Old State Highway, Keeler, CA 93530. Depending on availability, meetings may be held at an alternative appropriate venue that will be noticed to the public. Online and/or telephone options for participation will also be made available. At least one representative of the Administrator team will be present in person; other involved persons (e.g., legal counsel, technical service providers, etc.) will participate online.

The Administrator will provide meeting notices via website posting to KCSD’s website at keelercsd.specialdistrict.org, email distribution, or direct mail notification to Keeler community members’ residences. The Administrator will make reasonable efforts to provide ten-days’ notice to each public meeting using one or any combination of the foregoing methods. The meeting notice will be provided in the language spoken in the community and will include details such as

date, time, location or online meeting platform, and point-of-contact information. The Administrator will make reasonable efforts to provide ten-days' notice of each public meeting.

Each public meeting will include an opportunity for public comment. According to the Department of Drinking Water (DDW), translation services will not be required.

"Minutes" or other summary of meetings will be made available to the community; the Administrator may also provide regular updates to the community served through newsletters, emails, online, billing flyers, and other similar means of communication about the performance of the designated water system, an overview of the water system's financial health, updates on major projects or plans, updates on any changes to water rates, and updates on any other significant matters related to the water system. An email address has been set up to allow members of the KCSD community and KCSD vendors to contact the Administrator team and submit invoices or requests for payment. The email address is:

keeleradmin@ppeng.com

Emails to this address go to Juliet Benson and Catherine Hopkins (P&P Clovis office).

Golden State Water Company has provided a 24/7 phone line for customers to call with service-related issues or questions:

(800) 999-4033

2.4.2 Administrator Team

Communications between Administrator team (i.e., P&P, GSWC, Dan Raytis) and subcontractors (e.g., Ben Magana) will be handled primarily via email and teleconference (Teams meeting). Weekly meetings have been scheduled to discuss operations and maintenance, financial management, and system governance.

The Administrator team will communicate with the State Water Board agencies (i.e., DDW and Division of Financial Assistance) via monthly teleconferences (Team meeting).

The Administrator team will establish bi-weekly meetings via teleconference with the Inyo County Assistant Auditor-Controller Christie Martindale to review system finances and coordinate deposits and payments through the County Treasurer.

2.5 Recordkeeping

Public records, which include this report and all other reports prepared on behalf of KCSD, will be posted to the KCSD website and be made available in case of public records request.

A Sharepoint document sharing and reporting site has been set up to allow for file sharing between members of the Administrator team. Other contractors supporting the project will not

have access to the Sharepoint site. Information from those contractors will be sent to the Administrator team via email and will be saved to the project files or Sharepoint by the recipient.

Files for the project are saved on the P&P server. Those files on Sharepoint are duplicated to the P&P server.

3 Financial

Financial management of the Designated Water System (DWS) under the Administrator Program is discussed in the following sections.

3.1 Existing System

KCSD currently charges a flat rate of \$35 per month for standard residential connections. Other charges for various types of services are included in Attachment 3, Rate Chart. The KCSD Board bills each customer monthly and collects payments (generally check or money order). The Board treasurer mails these payments to the Inyo County's Auditor's office, and the Auditor deposits the payments into a KCSD-specific account at the Inyo County Treasury. KCSD's Board tracks and records payments from individual customers. The Inyo County Auditor records incoming funds but does not track individual accounts.

The KCSD Board prepares and submits an annual budget to Inyo County (due 60 days after the end of the fiscal year on August 30). The County Auditor tracks income and expenditures for auditing purposes, but budget control is the responsibility of the KCSD Board.

Once a year in August the KCSD Board holds a public meeting where any past-due accounts are identified and discussed. Payments to settle past-due accounts can be made at that time. The Board then submits a list of any unpaid accounts to the County Auditor. The County proceeds to place the past-due amount on the property tax bill of the delinquent property. The county will then deposit the past-due amounts into KCSD's treasury account, minus 1% of the past due amount plus a flat \$50 for processing the transaction. In this way community residents have essentially a "clean slate" each year with KCSD and KCSD is made whole by the County.

3.2 Water System Bank Accounts

KCSD's funds are held by the Inyo County Treasurer. The Administrator will become the authorized signatory for the account and all existing authorized signatories will be removed. Authorized account signatories for the Administrator will include:

- Stephen Spencer, Provost & Pritchard Consulting Group, sspencer@ppeng.com
- Catherine Hopkins, Provost & Pritchard Consulting Group, chopkins@ppeng.com
- Matthew Kemp, Provost & Pritchard Consulting Group, [mkemp@ppeng.com](mailto:m Kemp@ppeng.com)

A Signature Authorization for Auditor-Controller form has been prepared and submitted to Inyo County to formalize the status of the signatories. The form has been signed by Matthew Kemp as the Project Director for the Administrator program.

3.3 Accounting System and Bookkeeping

The Administrator will be responsible for establishing an annual operating budget and maintaining the accounting system for the designated water system. The Administrator will use Quickbooks to maintain accounting records. Those records will include:

- A summary of accounts receivable and accounts payable.
- A summary of the billing and collection of customer water service fees prepared monthly by GSWC and provided to the Administrator.

Inyo County's Auditor's office will provide financial reports on a monthly basis to the Administrator. These reports primarily list income and outgo against the approved KCSD annual budget. The Administrator will cross-check the reports provided by Inyo County and GSWC against collections, payments and deposits.

3.4 Billing and Collection

GSWC will perform all billing, collections, and customer service tasks for KCSD. GSWC will combine and transfer customer payments to the Inyo County Auditor on a monthly basis and send a summary of payments to the Administrator for inclusion in the project records.

The Administrator will work with the KCSD Board Secretary to gather customer payment history and account balances for the period prior to GSWC taking over the billing (i.e., through March 2023). Past due balances from March 2023 and earlier will be transmitted to customers via separate letter informing each of money owed and how to pay those past due balances.

Past-due balances for unpaid bills from April 2023 forward will be included with monthly bills from GSWC to keep customers informed regarding payments owed.

Some residents of Keeler pay in advance and carry credits on their account. Those credits will be transferred to GSWC and bills from GSWC will identify the account credit and how it is applied to current charges.

3.4.1 Initial Customer Account Setup

Customer accounts will be set up with GSWC after the Administrative Order is issued by the DDW. The KCSD Board secretary will provide a customer list with mailing addresses, APNs, and current balances. KCSD does not collect other personal information on customers (e.g., social security numbers, driver's license numbers, etc.). Customers will be asked to provide some personal information to set up an account with GSWC. That will allow the customer to access their own account information via phone or online. A copy of GSWC's customer account rules will be provided to each customer.

3.4.2 Customer Billing

GSWC will mail bills to customers at the end of every month for water used during that month. Monthly bills will include a summary of past-due amounts. KCSD has not in the past shut off water for non-payment, and Provost & Pritchard will continue this practice. Instead, past due bills are transferred annually by Inyo County to the delinquent customer's property tax bill. The County makes KCSD whole as part of this process, reducing or eliminating the need to shut off the water service.

Past due accounts will be notified beginning in June each year by mail of the past-due amount. The notification includes a copy of the KCSD policy for resolving unpaid water bills. Between June and mid-July, KCSD will conduct public outreach in compliance with the policy and the County's requirements. Any accounts that still have not been paid at the end of this process are submitted to the County Auditor (with attestation that all necessary outreach to the customer has been completed) for transfer to the property tax bill for those accounts.

3.4.3 Payment Collection

Mailed bills will have a return envelope to make payments by mail. Payment may be made by cash, check, money order or credit card. See the GSWC customer payment guidelines for specific information on payment via each method.

Customers will have the option to set up an account on GSWC website. Having an account will allow customers to view payment history and invoices and make payments using a credit card. Website can be viewed in English or Spanish. The online account is hosted by a third-party.

Customers will also have the option to make payments using a QR Code at convenient stores or check cashing businesses.

The GSWC will deposit payments with their bank and send a check for all payments received each month to the Inyo County Auditor by the 1st and 15th of each month. The payment will be accompanied by a summary statement of all billings and payments. That statement will be copied to the Administrator when the check is mailed. The Administrator will record payments in the KCSD Quickbooks account and reconcile monthly with GSWC so that billing statements sent by GSWC to customers reflect accurately any past due amounts.

3.4.4 Customer Service

The GSWC call service will address customer billing questions. The call center is open 24 hours per day and 7 days per week. The call center can provide assistance in English and Spanish. The customer service number will be posted on the KCSD website and on each customer bill.

3.5 Accounts Payable

3.5.1 Expenditures using Water Rate Revenue

The Administrator will use water rate revenues collected from customers (ratepayer funds will be transferred from by GSWC as noted in **Section 3.4.3**) to pay system operation and maintenance expenses. Expenses will include contract operator, utility bills, insurance, testing laboratory, and other costs necessary for the proper operation of the water system. Water rate revenue will also be used to pay past due bills owed by KCSD, if any, prior to taking over the system.

Water system expenses will be paid from the KCSD account held by the Inyo County Treasurer. In order to execute payment, the designated Administrator (see **Section 3.2**) will submit an “Authorization for Payment” to the County Auditor. The County will only make payments to pre-approved vendors, so all potential vendors for KCSD, including the contract operator, will need to complete a pre-approval form for submittal to the County. A copy of the form is included in Attachment 4 for reference.

KCSD does not have any employees so no payroll will be required.

Payment of approved invoices will be made by check. The County Auditor has indicated that checks are typically issued four days after receiving an Authorization for Payment except for specific expenses like utility costs. Current vendors will be aware of the required four-day turnaround, but new vendors should be informed when completing the pre-approval form.

3.5.2 Water Operations Subsidy

KCSD has been awarded supplemental operations and maintenance funding through the Safe and Affordable Funding for Equity and Resilience (SAFER) Urgent Drinking Water Needs (UDWNs) program. UDWN grant funding (also referred to as the O&M Funding Agreement) will subsidize KCSD to make up for any deficit in water rate revenue required for system operations. The Administrator will make reimbursement requests to the State Water Resources Control Board (SWRCB) for UDWN funding for operations and maintenance expenses, with the funding sent directly from the State to the County Auditor-Controller and then deposited directly into KCSD’s account with the County Treasurer. The Administrator will provide the County with a copy of the grant agreement and the applicable reimbursement request forms to back up the receipt of State funding.

Current SAFER UDWNs rules will not allow reimbursement of expenses incurred prior to the approved Funding Agreement date (i.e., past dues bills or other debt). Therefore, any debts held by KCSD will be paid by collecting water service fees.

3.6 Other Funding Source Accounting

3.6.1 Administrator Program Grant Funding

Beyond the activities listed in **Section 2.2**, grant proceeds from the Administrator program will fund the following activities:

- Management of water system operations, including customer service activities, billing and collections.
- Review of water quality data and preparation of compliance reports and other correspondence with the DDW to support the DWS's drinking water permit.

Administrator grant funding will not fund operation and maintenance activities conducted by the contract operator, equipment and consumables related to system operation, design and construction of system repairs or upgrades, and emergency bottled water. The following sections discuss additional funding programs that will be accessed to support KCSD.

3.6.2 Planning and Construction Funding

The Administrator will work with a State-assigned Technical Assistance provider to apply for grant funding through the SWRCB to provide funds for design and construction of water system improvements. Costs associated with these funding programs will be paid for by this grant. Reimbursement requests will be submitted to the SWRCB to receive funds. Funds will be handled in the same way as UDWN grant funds (see **Section 3.5.2**, above). All funds will be tracked separately from operations by the Administrator.

3.6.3 UDWN Bottled Water

KCSD has previously applied for funding for bottled water with the help of a State Technical Assistance provider (Rural Community Assistance Corporation) and that water is currently being distributed. The Administrator will verify that the bottled water is being delivered and will sign grant-related documents on behalf of KCSD but will not otherwise be involved with the bottled water funding.

3.7 Financial Audits

Inyo County arranges for a bi-annual audit of all small county water systems including KCSD. The cost of the audit is divided among each system based on population, and the cost is paid out of the KCSD funds (typically around \$800). The result of the most recent audit is pending.

4 References

California Rural Water Association (CRWA) Feasibility Study - Water System Improvements to Mitigate Arsenic and Manganese in Drinking Water, Keeler Community Services District, June 2021.

Division of Drinking Water, Administrator Policy Handbook, State Water Resources Control Board September 2019.

Division of Financial Assistance, Administrator Grant Agreement No. SWRCB0000000000D2018204 by and between Provost & Pritchard Consulting Group and California State Water Resources Control Board for the purpose of the Provost & Pritchard Administrator Master Agreement Project, January 2021.

Attachment 1. Administrative Order



State Water Resources Control Board

Division of Drinking Water

February 9, 2023

System No. 1400036

Board Members
Keeler Community Service District
P.O. Box 107
Keeler, CA 93530

COMPLIANCE ORDER NO. 13-E1-23R-001
ADMINISTRATOR ORDER TO KEELER COMMUNITY SERVICE DISTRICT AND SELECTION OF PROVOST AND PRITCHARD CONSULTING GROUP, INC. AS THE FULL-SCOPE ADMINISTRATOR

Enclosed is Compliance Order No. 13-E1-23R-001 (“Order”), issued to the Keeler Community Service District (“Water System”) public water system. Please note that there are legally enforceable directives associated with this Order.

The State Water Board appreciates the willingness of the Water System and Provost and Pritchard Consulting Group, Inc. (“Provost and Pritchard”) to work together over the past several months. As discussed in the Order, the Water System is ordered to accept Provost and Pritchard as a full-scope administrator and allow Provost and Pritchard to exercise full authority and control over the Water System. The State Water Board looks forward to continuing to work with both the Water System and Provost and Pritchard as they develop a sustainable long-term solution.

Any person who is aggrieved by a citation, order or decision issued under authority delegated to an officer or employee of the State Water Board under Article 8 (commencing with CHSC, Section 116625) or Article 9 (commencing with CHSC, Section 116650), of the Safe Drinking Water Act (CHSC, Division 104, Part 12, Chapter 4), may file a petition with the State Water Board for reconsideration of the citation, order or decision.

Petitions must be received by the State Water Board within 30 days of the issuance of the citation, order or decision by the officer or employee of the State Water Board. The date of issuance is the date when the Division of Drinking Water mails a copy of the

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

citation, order or decision. If the 30th day falls on a Saturday, Sunday, or state holiday, the petition is due the following business day by 5:00 p.m.

Information regarding filing petitions may be found at:

http://www.waterboards.ca.gov/drinking_water/programs/petitions/index.shtml

If you have any questions regarding this matter, please contact Bryan Potter of my staff at (559) 447-3397 or me at (916) 341-6027.

Sincerely,



Andrew Altevogt, P.E., Ph.D.
Assistant Deputy Director
Division of Drinking Water
State Water Resources Control Board

Enclosures

Certified Mail No. 7019 0140 0000 8436 6935

cc (via email):

Ana Melendez, Director of Legislative Affairs, ana.melendez@waterboards.ca.gov
Andres Aguirre, SWRCB – San Bernardino District, andres.aguirre@Waterboards.ca.gov
Bryan Potter, SWRCB – SoCal Engagement Unit Senior, bryan.potter@waterboards.ca.gov
James Garrett, SWRCB – DFA Unit Senior, James.garrett@waterboards.ca.gov
Jayna King, Keeler CSD Board Member, jaynaking@hotmail.com
Jeanne Elliott, Keeler CSD Board Member, jeannelander@outlook.com
Jeff Eklund, Provost and Pritchard Consulting Group, Inc., jeklund@ppeng.com
Karen Riggs, Keeler CSD Board Member, karen@easternsierra.us
Kurt Souza, SWRCB – Branch Chief, kurt.souza@waterboards.ca.gov
Matt Kingsley, Inyo County District 5 Supervisor, mkingasley@inyocounty.us
Michelle Frederick, SWRCB – SAFER Section Chief, michelle.frederick@waterboards.ca.gov
Omid Rabbani, SWRCB – SoCal Engagement Unit, omid.rabbani@waterboards.ca.gov

Tammy Hursell, Keeler CSD Board Member; haithcoat@icloud.com
Sarah Lee, Provost and Pritchard Consulting Group, Inc., SLee@ppeng.com
Sarah Peterson, Inyo County DEH, spetersen@inyocounty.us
Sean McCarthy, SWRCB – Section V Chief, sean.mccarthy@waterboards.ca.gov
Sheri Cosgrove, Keeler CSD Board Member; keelerbeach@schat.net
Stephen Spencer, Provost and Pritchard Consulting Group, Inc., sspencer@ppeng.com
Wei Chang, SWRCB – District Engineer, wei.chang@waterboards.ca.gov

2
3 STATE OF CALIFORNIA
4 STATE WATER RESOURCES CONTROL BOARD
5 DIVISION OF DRINKING WATER
6

7 **Name of Public Water System:** Keeler Community Service District

8 **Water System No:** 1400036
9

10 **Attention:** Board Members

11 Keeler Community Service District

12 P.O. Box 107

13 Keeler, CA 93530
14

15 **Issued:** February 9, 2023
16
17

18 COMPLIANCE ORDER NO. 13-E1-23R-001
19 ADMINISTRATOR ORDER TO KEELER COMMUNITY SERVICE DISTRICT AND
20 SELECTION OF PROVOST AND PRITCHARD CONSULTING GROUP, INC. AS
21 THE FULL-SCOPE ADMINISTRATOR
22 CALIFORNIA HEALTH AND SAFETY CODE, SECTION 116686
23

24 The State Water Resources Control Board (“State Water Board”), acting by and through
25 its Division of Drinking Water (“Division”), hereby issues Order No. 13-E1-23R-001,
26 pursuant to Section 116686 of the California Health and Safety Code¹ to the Keeler
27 Community Service District water system (“Water System”) as set forth below.

¹ Unless otherwise indicated, all statutory citations are to the California Health and Safety Code.

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APPLICABLE AUTHORITIES

To provide affordable, safe drinking water to disadvantaged communities and to prevent fraud, waste, and abuse, Section 116686, subd. (a) authorizes the State Water Board to order a “designated water system to accept administrative, technical, operational, legal, or managerial services, including full management and control of all aspects of the designated water system, from an administrator selected by the state board.”

- Section 116686, subd. (m) defines “designated water system” as a public water system that “serves a disadvantaged community, and that the state board finds consistently fails to provide an adequate supply of affordable, safe drinking water.”
- Section 116681, subd. (f) defines a “disadvantaged community” as a disadvantaged community, as defined in Section 79505.5 of the Water Code.
- Division 26.5, Section 79505.5, subd. (a) of the Water Code states, “Disadvantaged Community” means a community with an annual median household income that is less than 80 percent of the statewide annual median household income.”
- Section 116681, subd. (a) defines “adequate supply” as “sufficient water to meet residents' health and safety needs at all times.”
- Section 116681, subd. (c) defines “consistently fails” as “failure to provide an adequate supply of safe drinking water.”
- Section 116681, subd. (l) defines “safe drinking water” as “water that meets all primary and secondary drinking water standards.”
- Section 116275, subd. (c) defines “primary drinking water standards” as maximum contaminant levels, treatment techniques adopted in lieu of maximum contaminant levels, and monitoring and reporting requirements of maximum contaminant levels as specified by regulation.

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- Section 116686, subd. (f) states that, “[a] designated water system shall not be responsible for any costs associated with an administrator that are higher than the costs necessary to maintain the designated water system and provide an adequate supply of affordable, safe drinking water.”
- Section 116686, subd. (g) requires that, “[b]efore ordering a designated water system to accept administrative, technical, operational, legal, or managerial services from an administrator pursuant to subdivision (a), the state board shall develop standards, terms, and procedure” for certain specified topics related to the selection and oversight of an administrator. The State Water Board has adopted an Administrator Policy Handbook to comply with this requirement. A copy of the Administrator Policy Handbook can be found on the Safe and Affordable Funding for Equity and Resilience’s (SAFER) Website at https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/administrator.html

STATEMENT OF FACTS

a. Water System Characteristics

The Water System is classified as a community water system serving approximately 66 people through 84 active service connections. The Water System is governed by a 5-member board of directors who are elected to serve by the community. Board members serve 4-year terms. The physical address of the Water System is 165 Railroad Ave, Keeler, CA 93530.

The Water System's sole source of domestic water is provided by a single, ten-inch diameter well (Well 01) that was constructed in 1983 to a depth of 125 feet, which is perforated from 51 feet to 108 feet below ground surface. The static water level is approximately 41 feet below ground surface. The Water System has one 100,000-gallon steel storage tank, which was found to be in good condition based on an

1 inspection report prepared in 2011. The distribution mains are polyvinyl chloride (PVC)
2 pipe of 4 or 8 inches in diameter. There are no customer water meters, and customers
3 are billed at a flat rate of approximately \$35.00 per month.

4
5 **b. The Water System Serves a Severely Disadvantaged Community**

6 The Water System serves a severely disadvantaged community as defined by Section
7 116681, subd. (f). Section 116681, subd. (f) incorporates the definition of a
8 disadvantaged community provided in Water Code Section 79505.5. Section 79505.5
9 defines a disadvantaged community as a community with an annual median
10 household income that is less than 80 percent of the statewide annual median
11 household income. According to the 2020 American Community Survey², 80 percent
12 of the statewide median household income is \$62,938. The definition of a severely
13 disadvantaged community is a community with an annual median household income
14 that is less than 60 percent of the statewide median household income. According to
15 the 2020 American Community Survey, 60 percent of the statewide median household
16 income is \$47,203.

17
18 Based on the 2016-2020 American Community Survey, the Water System's service
19 area has a calculated MHI of \$45,223. This income classifies the Water System as a
20 severely disadvantaged community.

21
22 **c. The Water System Has Consistently Failed to Provide an Adequate Supply
23 of Affordable, Safe Drinking Water**

24 Section 116555 requires all public water systems to comply with primary drinking
25 water standards as defined in Section 116275, subd. (c). Primary drinking water

² The State Water Board utilizes the American Community Survey (ACS) 5-Year Estimates to determine the MHI of a community.

1 standards include maximum contaminant levels, specific treatment standards, and
2 monitoring and reporting requirements as specified in regulations.

3
4 The Water System has exceeded the primary maximum contaminant level (MCL) for
5 arsenic and the secondary MCL for manganese in Well 01 since 2003. Table 1
6 provides a summary of sample results for these constituents since 2015. Arsenic
7 concentrations range from 5 to almost 11 times the regulatory requirement.

8 In response to high concentrations of arsenic, the Water System installed Point of Use
9 (or POU) treatment devices at many service connections in 2005 before adoption of
10 the POU Emergency regulations of 2010. The POU devices are not third-party certified
11 to the applicable American National Standards Institute (ANSI) Standard, aging and
12 difficult for the Water System to maintain their treatment performance. Most of the
13 residents currently relying on bottled water for their drinking water needs.

14

15 **Table 1: Arsenic and Manganese Sampling Results for Well 01 (2015-Present)**

16

Sample Date	Arsenic (ug/l)	Manganese (ug/l)
	MCL =10 ug/l	MCL = 50 ug/l
2015-01-05	55	44.6
2015-04-01	72	57.4
2015-07-01	43	48.6
2015-10-04	80	84.5
2016-01-11	85	79.4
2016-04-03	51	52.6
2016-07-05	97	95
2016-08-03	97	100

2016-10-09	70	72.6
2017-01-08	72	82.9
2017-04-08	95	100
2017-05-08	83	90
2017-07-12	75	77.9
2017-10-05	77	77.3
2018-01-07	72	64.4
2018-06-28	90	88.4
2018-12-17	74	79.4
2019-01-02	78	89.2
2019-04-29	83	99.6
2019-09-27	101	106
2019-12-23	74	81.6
2020-02-24	85	81
2020-03-24	84	77.4
2020-06-24	107	82.7
2020-07-28	106	92
2020-09-22	100	106
2020-12-15	67	96.5
2021-03-18	77	86
2021-04-08	72	80
2021-06-17	75	81.5
2021-09-07	80	70.9
2021-11-29	83	80.9
2022-03-16	67	74.1
2022-06-03	82	96.9
2022-09-08	77	94.7

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In March 2016, the Inyo County Local Primacy Agency (LPA) issued Compliance Order No. 05-44-16R-001 for violation of the arsenic MCL in Well 01. The Compliance Order directed the Water System to return to compliance on or before July 1, 2018. The Water System failed to comply with the Compliance Order to implement a solution; subsequently, Inyo County LPA issued another Compliance Order (No. 05-44-19R-063) for violation of the arsenic MCL in Well 01. The compliance order directed the Water System to comply with several interim Directives, and ultimately return to compliance on or before December 1, 2021. The existing POU devices that were installed at the residences were found to be unacceptable treatment devices because they were unable to meet the POU regulations.

In response to Compliance Order No. 05-44-19R-063, the Water System failed to comply with the Directives 3 and 4 of the order. Directives 3 and 4 required quarterly distribution of public notices regarding the current arsenic levels and the associated public health risks. In the first and second quarter of 2020, public notices were not distributed. Therefore, Inyo County LPA issued Citation No. 05-44-20C-058 to the Water System on August 31, 2020. No long-term compliance solution has been implemented and violations are ongoing.

The Water System has also violated the secondary MCL for manganese since April 17, 2014. According to the State's records, the Inyo County LPA issued an Enforcement Action for the manganese violation on April 30, 2016. The Water System continues to fail to comply with the secondary MCL for manganese and no long-term compliance solution has been implemented and violations are ongoing.

There are also concerns regarding the Water System's lack of technical, managerial, and financial capacity to operate the water system in compliance with the federal and

1 state requirements. For example, the Water System’s board members have changed
2 frequently, and for a long period of time the Water System was unable to achieve a
3 full board of 5 seats. The Water System has also failed to obtain and retain a certified
4 operator to operate and maintain the system.

5
6 **d. Administrator Appointment**

7 On January 13, 2021, the State Water Board provided the Water System with notice
8 and an opportunity to show, by February 15, 2021, that: (1) the Water System “has not
9 consistently failed to provide an adequate supply of affordable, safe drinking water”;
10 and/or (2) that the Water System, “has taken steps to timely address its failure to provide
11 an adequate supply of affordable, safe drinking water.” The notice is shown in
12 Attachment A. The State Water Board did not receive a response from the Water
13 System demonstrating that the Water System has consistently provided an adequate
14 supply of affordable and safe drinking water.

15
16 Pursuant to Section 116686, subd. (b)(2) and the Administrator Policy Handbook, on April
17 16, 2021, the State Water Board notified by mail all ratepayers, renters, and property
18 owners in the Water System’s service area, as well as representatives of the Water
19 System, of a public meeting on May 18, 2021, to provide information on the proposed
20 administrator for the Water System and receive input on the potential administrator
21 appointment. This notice is shown in Attachment B. The notice also included the name,
22 qualifications, proposed scope of the appointment and services to be provided by the
23 administrator being considered, and disclosure of conflicts of interest, as defined in the
24 California Code of Regulations (title 2, division 6, chapter 7, commencing with section
25 18700).

26
27 On May 18, 2021, the State Water Board conducted a well attended web-based public
28 meeting, pursuant to Section 116686, subd. (b)(2), for the affected ratepayers, renters,

1 and property owners in the Water System’s service area. The web-based meeting was
2 necessary to do COVID-19 restrictions at the time. Public comment and feedback were
3 solicited during the meeting. General questions were addressed regarding funding,
4 replacement water, and timeline of appointing an administrator.

5
6 The closing period for public comment on the administrator selection was May 25, 2021.
7 Several written comments were received by the end of public comment closing period.
8 One comment expressed concern about a potential conflict of interest with the Golden
9 State Water Company, a subcontractor of Provost and Pritchard. This comment was
10 reviewed and no legal basis for a change of administrator was required. The comments
11 were noted and considered for the final decision to proceed with this Order and appointing
12 the selected administrator.

13
14 **FINDINGS**

- 15
- 16 1. Based on the above Statement of Facts, and pursuant to Section 116686, subd.
17 (m)(2), the Water System is a “designated water system” because it serves a
18 disadvantaged community and “the state board finds [it] consistently fails to
19 provide an adequate supply of affordable, safe drinking water.” According to the
20 2016-2020 American Community Survey, the Water System’s service area has
21 a calculated MHI of \$45,223, approximately 57 percent of the statewide MHI of
22 \$78,672. The Water System has active compliance orders for violation of the
23 arsenic MCL. The Water System has not implemented a long-term solution and
24 sampling results consistently exceed the MCL for arsenic and the secondary
25 MCL for manganese.
 - 26
27 2. The Division has complied with the procedural requirements in Section 116686
28 and the Administrator Policy Handbook to appoint the Administrator to the Water

1 System. The Division considered all public comments and none were serious
2 enough to warrant changes to the proposed administrator.

3
4 3. On June 3, 2021, the State Water Board contacted the Provost and Pritchard
5 Consulting Group, Inc. (“Provost and Pritchard”) to confirm their willingness to be
6 an administrator for the Water System, pursuant to Section 116686. Provost and
7 Pritchard confirmed their willingness to serve as the administrator for the Water
8 System on June 4, 2021. This confirmation is shown in Attachment C.

9
10 4. As set forth in the California Environmental Quality Act (“CEQA”) Guidelines (Cal.
11 Code Regs., title 14, division 6, chapter 3, section 15061, subd. (b)(3)) this Order
12 is exempt from the provisions of CEQA because it can be seen with certainty that
13 there is no possibility that the Order will have a significant effect on the
14 environment. Pursuant to California Health and Safety Code section 116686,
15 subd. (a)(1)(B), this Order requires the Water System to accept administrative,
16 technical, operational, legal, and managerial services, including full management
17 and control of all aspects of the designated water system from an administrator
18 selected by the State Water Board. The Order does not propose or require the
19 Water System to undertake, any specific actions which will have a significant effect
20 on the environment.

21
22 5. The Division of Financial Assistance approves \$1,036,463 in funding, for the term
23 of the project from March 4, 2022 to February 5, 2025. Provost and Pritchard may
24 provide financial support for administrator functions as defined in the approved
25 Scope of Work, which will be included in the executed funding agreement. The
26 approved Scope of Work includes a Community Accountability and Engagement
27 Plan, a Post-Administrator Drinking Water Service Plan, and tasks necessary to
28 assist the Water System. Provost and Pritchard is not legally liable for costs

1 outside the approved Scope of Work. Other costs related to the operations and
2 maintenance of the Water System shall be paid from water rates, infrastructure
3 improvements shall be completed from water rates and/or application for funding
4 grants, as applicable.

6 **ORDER**

7 The State Water Board hereby orders as follows:

- 8
- 9 1. Provost and Pritchard is appointed as the full-scope administrator for the Water
- 10 System. Effective March 13, 2023, the Water System must unconditionally accept
- 11 administrative, technical, operational, legal, financial, and managerial services,
- 12 including full management and control of the system, from Provost and Pritchard.
- 13 Full management and control includes hiring, dismissal, and reassigning staff to
- 14 support administrator and operational duties.
- 15 2. Effective immediately, the Water System must work with Provost and Pritchard to
- 16 effectuate the transition of full management and control of the Water System. This
- 17 includes but is not limited to, providing Provost and Pritchard access to all
- 18 electronic and hard copies of operating records of the water system, customers’
- 19 accounts, water quality and quantity records, water system’s design and operation
- 20 plans. The Water System shall also provide access to water system facilities, and
- 21 access to finances including restricted and unrestricted funds.
- 22 3. This Order shall remain effective and in place until rescinded, terminated, or
- 23 otherwise modified by the State Water Board.
- 24

25 Pursuant to Section 116655, the Division reserves the right to make such modifications
26 to this Order and/or to issue such further order(s) as it may deem necessary to protect
27 public health and safety. Such modifications may be issued as amendments to this Order
28 and shall be deemed effective upon issuance.

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Nothing in this Order relieves the Water System of its obligation to meet the requirements of the California Safe Drinking Water Act (hereinafter “California SDWA,” Health and Safety Code, division 104, part 12, chapter 4, commencing with section 116270) or any regulation, standard, permit or order issued thereunder.

PARTIES BOUND

This Order shall apply to and be binding upon the Water System, its officers, directors, agents, employees, contractors, successors, and assignees.

SEVERABILITY

The requirements of this Order are severable, and the Water System shall comply with each and every provision hereof notwithstanding the effectiveness of any other provision.

FURTHER ENFORCEMENT ACTION

The California SDWA authorizes the Division to issue orders and citations with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any regulation, permit or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or order. The California SDWA also authorizes the Division to take action to suspend or revoke a permit that has been issued to a public water system if the system has violated applicable law or regulations or has failed to comply with an order of the Division; and to petition the superior court to take various enforcement measures against a public water system that has failed to comply with an order of the Division. The Division does not waive any further enforcement

1 action by issuance of this order. Pursuant to Section 116725(c), CHSC, "Any person
2 who violates [this] order...may be liable, as determined by the court, for a civil penalty
3 not to exceed five thousand dollars (\$5,000) for each separate violation or, for
4 continuing violations, for each day that violation occurs."
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10
11 February 9, 2023



12 Date

13 Andrew Altevogt, P.E.
14 Assistant Deputy Director
15 Division of Drinking Water
16 State Water Resources Control Board

17 Attachments:

- 18
- 19 A. Division of Drinking Water Notice
- 20 B. Public Meeting Notice
- 21 C. Provost and Pritchard Correspondence
- 22

GAVIN NEWSOM
GOVERNORJARED BLUMENFELD
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

Division of Drinking Water

January 13, 2021

Board Members
Keeler Community Service District
P.O. Box 107
Keeler CA 93530

**RE: NOTICE – 1st STEP OF ADMINISTRATOR PROCESS
KEELER COMMUNITY SERVICE DISTRICT (CA1400036)**

Dear Board Members,

The purpose of this letter is to inform you that the State Water Resources Control Board (State Water Board) is taking the first step to designate Keeler Community Service District (Keeler CSD) as a public water system in need of an Administrator because it has not consistently provided an adequate supply of affordable, safe drinking water to its customers. The State Water Board is taking this step now for two reasons: 1) a State funded administrator will be able to take on many of the tasks that will be required to assist the water system into coming into compliance with applicable drinking water laws and regulations sustainably into the future, and 2) it may take some time to go through the required steps to appoint an administrator. A summary of the designation process, responsibilities of a full-scope administrator, applicable regulatory sections, and policies are provided as attachments.

The legally required formal first step in this process is for the State Water Board to give Keeler CSD notice of its intended action and provide the water system an opportunity to show either of the following:

- a. It has not consistently failed to provide an adequate supply of affordable, safe drinking water, or
- b. It has taken steps to timely address its failure to provide an adequate supply of affordable, safe drinking water.

If Keeler CSD has evidence and wishes to show that the violations listed on the following page have been resolved, please provide that information by **February 15, 2021** via email to Karen Nishimoto at Karen.Nishimoto@waterboards.ca.gov.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

List of Violations

Keeler CSD has failed to:

- Comply with CCR, Title 22, Section 64431, Maximum Contaminant Levels (MCL) for Inorganic Chemicals- arsenic. Compliance Order 05-44-19R-063 was issued to Keeler CSD on September 30, 2019.
- Comply with the Compliance Order 05-44-19R-063 by failing to distribute appropriate public notification and submit certification of completion of public notification in a timely manner for the first and second quarters of 2020. Citation no. 05-44-20C-058 was issued to Keeler CSD on August 31, 2020 for this failure.
- Comply with the Compliance Order's Directive to submit an acceptable corrective action plan (CAP) by November 15, 2019. Compliance Order 05-44-20R-073 was issued to Keeler CSD on December 30, 2020 because of failure to comply with public notice distribution requirements, and by not submitting an acceptable Corrective Action Plan with a time frame for remediation of the high levels of arsenic by December 31, 2021.

California Health and Safety Code Section 116530 authorizes the State Water Board to request financial capacity information. In order to help facilitate the State Water Board to more quickly respond to any impending need to support Keeler CSD' customers, please provide three (3) years of financial statements, preferably audited financial statements if available, any accounting and financial policies, rate structures, and current capital improvement plan. The financial statements should include the current year (if available) and the two previous years, or three previous years if the current year has not yet been completed. Additionally, identification of any restricted funds and the reason for the restrictions could better facilitate assistance from the State Water Board. The State Water Board is requesting this information be submitted by **February 15, 2021**.

If you have any questions regarding this letter, please contact me. Due to our current COVID response, email is the best correspondence method. I can be reached at Karen.Nishimoto@waterboards.ca.gov.

Sincerely,

Karen Nishimoto, P.E.
Senior Water Resource Control Engineer, Southern Engagement Unit
State Water Resources Control Board, Division of Drinking Water

Attachment 1. Administrator Process Summary
Attachment 2. Responsibilities of a Full-Scope Administrator
Attachment 3. Section 116686 of the California Health and Safety Code
Attachment 4. Administrator Policy Handbook

cc: Noah Bricker, Keeler CSD Board Member
siopposition@gmail.com

Sharon Cummings, Keeler CSD Board Member
cummin@schat.net

Dan Dickman, Keeler CSD Board Member
dickman@schat.com

Mike Gibson, Keeler CSD Board Member
m.gibsonkcsd@gmail.com

Jim Macey, Keeler CSD Board Member
keeler@qnet.com

Kathy Barton
Inyo County Environmental Health Services
kbarton@inyocounty.us

Eric Zuniga, P.E.
San Bernardino District Engineer
Division of Drinking Water
Eric.Zuniga@waterboards.ca.gov

Sean McCarthy, P.E.
Section 5 Chief
Sean.McCarthy@waterboards.ca.gov

Cathreen Richards, Executive Officer
Inyo Local Agency Formation Commission
crichards@inyocounty.us

Supervisor Matt Kingsley
Inyo County Board of Supervisors, District 5
mkinsley@inyocounty.us

Bcc:

James Garrett

James.Garrett@waterboards.ca.gov

Jasmine Oaxaca

Jasmine.Oaxaca@waterboards.ca.gov

Adriana Renteria

Adriana.Renteria@waterboards.ca.gov

Marina Perez

Marina.Perez@waterboards.ca.gov

Attachment 1

Administrator Process

Section 116686 of the California Health and Safety Code and the Administrator Policy Handbook, adopted by the State Board in September 2019, requires that the State Board must find that the System's public water system is a "designated water system" and take other specific actions before it can issue an order to the System to accept a full-scope administrator. A "designated water system" is defined in section 116686(m)(2) as a public water system that serves a disadvantaged community, and that the State Water Board finds consistently fails to provide an adequate supply of affordable, safe drinking water. A copy of section 116686 and the Administrator Policy Handbook are provided in subsequent attachments. The actions required of the State Water Board are summarized below.

1. The State Board must give the water system notice of its actions and provide it with an opportunity to show either of the following:
 - a. It has not consistently failed to provide an adequate supply of affordable, safe drinking water, or
 - b. It has taken steps to timely address its failure to provide an adequate supply of affordable, safe drinking water.
2. Conduct a public meeting in a location as close as feasible to the affected community.
 - a. Provide 30-day notice of the public meeting to affected ratepayers, renters, and property owners.
 - b. Provide an opportunity for representatives of the System, affected ratepayers, renters, property owners, and the public to present oral and written comments at the meeting.
 - c. Provide an opportunity to submit comments by mail or electronically during the 30-day notice period and for at least one week after the public meeting
3. Make a reasonable effort to provide notice to all ratepayers, renters, and property owners who receive water service from the designated water system of the following:
 - a. The name and qualifications of the administrator being considered by the State Board
 - b. The scope of the appointment and the particular services to be provided by the administrator being considered by the State Board, and
 - c. Any conflict of interest
4. Issue an order to the System requiring it to accept a full-scope administrator to take complete management control of its public water system.

Attachment 2

Responsibilities of a Full-Scope Administrator

All actions taken by an administrator are required to be in the best interest of the community served by the water system and must be intended to develop the water system's capability to sustainably deliver an adequate supply of affordable, safe drinking water so that the services of the administrator are no longer necessary. Section 116686 and the Administrator Policy Handbook requires the State Water Board to enter into a contract or grant agreement with an appointed administrator and fund the cost of the administrator to provide the agreed upon service to the System.

The Administrator is required to provide reports in order to keep the governing board or owner of the water system and the customers served informed about actions taken and status of the system. In addition, the Administrator Policy Handbook includes a process that allows any ratepayer, renter, or property owner who receives water from a designated water system to submit a petition to the State Water Board for the reversal or modification of an administrator decision or replacement of an administrator. A complete description of an administrator's obligations is contained in section 116686 of the Health and Safety Code and in the Administrator Policy Handbook.

The authority and scope of work of an administrator is established on a case by case basis in the contract/grant agreement executed between the State Water Board and the administrator and in the order issued to the public water system to accept the services of the administrator. **In the case of Keeler CSD, the full-scope administrator appointed to it will have authority to exercise complete managerial control over its public water system, including but not limited, to financial reviews, responding and representing Keeler CSD to regulatory agencies, entering into contracts, establishing operational budgets and rates, acceptance of water rate payments to pay water system expenses, system operation, and keeping customers informed of the status of the water system.**

Attachment 3

CA Health and Safety Code Section 116686:

http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC§ionNum=116686.

The State Water Board has not provided a paper copy of this section in the interest of decreasing environmental impacts. However, should you be unable to access this website for any reason, please do not hesitate to contact our office for a paper copy.

Attachment 4

Administrator Policy Handbook:

https://www.waterboards.ca.gov/board_info/agendas/2019/sept/091719_6_cs1_cleanversion.pdf

The State Water Board has not provided a paper copy of this section in the interest of decreasing environmental impacts. However, should you be unable to access this website for any reason, please do not hesitate to contact our office for a paper copy.

ATTACHMENT B



GAVIN NEWSOM
GOVERNOR



JARED BLUMENFELD
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

Video and Teleconference Meeting During COVID-19 Emergency

This meeting will occur via remote presence only as a result of the COVID-19 emergency and the Governor's Executive Orders to protect public health by limiting public gatherings and requiring social distancing.

Notice of Public Meeting

Identification of a Potential Administrator for Keeler Community Service District

May 18, 2021

6:00pm - 8:00pm

https://bit.ly/Keeler_Administrator
Remote Participation Only

PURPOSE

The State Water Resources Control Board (State Water Board) invites you to attend a meeting to learn about Provost & Pritchard Consulting Group and its teaming partners (the Provost & Pritchard team) as a potential administrator to the Keeler Community Service District (Keeler CSD).

An administrator is a person or entity that is appointed and/or authorized to exercise total and complete managerial control over a designated water system in order to provide an adequate supply of safe and affordable drinking water.

This public meeting is a requirement of the administrator selection process. The purpose of this meeting is to provide information on the following:

- Current status of drinking water in Keeler Community Services District
- Purpose and role of an Administrator
- Administrator qualifications, conflicts of interest, and scope of work

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

The meeting will also include an opportunity for the public to ask questions and provide comments. The public can submit questions and comments through **May 25, 2021**.

MEETING LOGISTICS: If you wish to join the meeting by Zoom or phone:

Zoom: https://bit.ly/Keeler_Administrator

Phone: +1-669-900-9128 Meeting ID: 998 7384 7226

LANGUAGE SERVICES

To request language interpretation or sign language services, please submit your request at least 10 business days before the meeting by contacting Marina Perez at (916) 322-4265 or SAFER@waterboards.ca.gov.

ACCESSIBILITY

Telecommunications device for the deaf (TDD) users may contact the California Relay Service at: (800) 735-2929 or voice line at (800) 735-2922.

MEETING MATERIALS

Meeting materials and details on remote participation are available at bit.ly/DDW_AdminWebsite. To receive meeting materials in advance, register at http://bit.ly/Keeler_updates. Meeting materials and details will be emailed to registered participants before the meeting.

HOW TO SUBMIT PUBLIC COMMENTS – DEADLINE MAY 25, 2021

Mail: Omid Rabbani

State Water Resources Control Board – Division of Drinking Water
464 W 4th St, Room 437, San Bernardino, CA 92401

Email: DDW-Administrator@waterboards.ca.gov

BACKGROUND

On January 13, 2021, the State Water Board took the first step in designating Keeler CSD as a water system in need of an administrator because it has not consistently provided an adequate supply of affordable, safe drinking water to its customers. Keeler CSD has active compliance orders for violation of the Maximum Contaminant Level for arsenic. Keeler CSD has been providing bottled water to its customers until a long-term solution is in place.

The State Water Board proposes appointing an administrator for Keeler CSD to manage the water system. All actions taken by an administrator are required to be in the best interest of the community served by the water system and include the following:

- Developing access to an adequate supply of safe and affordable drinking water; and
- Holding public meetings at least every three months.

Any ratepayer, renter, or property owner who receives water from a

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

designated water system can submit a petition to the State Water Board to reverse or modify an administrator decision or to replace an administrator. A description of this process and the administrator authority is contained in Health and Safety Code Section 116686 and in the State Water Board's Administrator Policy Handbook (Sept. 2019) at https://bit.ly/SAFER_Administrator_Handbook.

Information on Proposed Administrator

NAME OF ADMINISTRATOR

The Provost & Pritchard team has been identified as a viable candidate to be appointed as an administrator for Keeler CSD. Their qualifications include:

- Managed all aspects of dozens of water systems and special districts, including all necessary technical, managerial, and administrative needs.
- Specialized public outreach capability to help facilitate stakeholder discussions.
- Certified Treatment and Distribution operators on staff ready to provide operational support.
- Team of engineers, planners, and technicians with extensive experience in water resource management, planning, and implementing solutions.

SCOPE OF APPOINTMENT & SERVICES PROVIDED

This administrator will be a Full-Scope Administrator as defined in the Administrator Policy Handbook available online at bit.ly/SAFER_Administrator

CONFLICT OF INTEREST

To date, no conflict of interest has been found by the State Water Board or reported by the Provost & Pritchard team. If at any time a proposed action would create a conflict of interest, an administrator is required to provide written notice to the State Water Board in addition to all ratepayers, renters and property owners, who receive water service from the designated water system 30 days prior to taking the action.

MORE INFORMATION

Omid Rabbani (909) 888-4985; Omid.Rabbani@waterboards.ca.gov
Karen Nishimoto at (818) 551-2049, Karen.Nishimoto@waterboards.ca.gov
Water Board website: bit.ly/DDW_AdminWebsite

Junta Estatal del Control de los Recursos del Agua

Reunión por video y teleconferencia durante la emergencia COVID-19

Esta reunión se realizará solamente a distancia debido a la emergencia COVID-19 y las Órdenes Ejecutivas del Gobernador, las cuales limitan las agrupaciones públicas y requieren el distanciamiento social a fin de proteger la salud pública.

Anuncio de Reunión Pública

Identificación de un Administrador probable para el Distrito de Servicios Comunitarios de Keeler

**18 de mayo de 2021
de 6:00pm a 8:00 pm**

**[https://bit.ly/Keeler Administrator](https://bit.ly/Keeler_Administrator)
Participación a distancia solamente**

PROPÓSITO

La Junta Estatal del Control de los Recursos del Agua (Junta Estatal del Agua) invita al público a participar en una reunión informativa sobre la designación de Provost & Pritchard Consulting Group y sus asociados (el grupo Provost & Pritchard) como administrador probable del Distrito de Servicios Comunitarios de Keeler (Keeler CSD).

Un administrador es la persona u organización designada o autorizada para gestionar, de manera parcial o total, un sistema de agua determinado a fin de proporcionar el suministro adecuado de agua potable segura y económica.

Esta reunión pública es uno de los requisitos del proceso de selección de un administrador. El propósito de dicha reunión es informar sobre lo siguiente:

- El estado actual del agua potable en Keeler CSD;
- El propósito y la función de un administrador; y
- Las competencias del administrador y el marco de sus responsabilidades, así como la revelación de cualquier conflicto de interés.

Durante la reunión, se le brindará al público la oportunidad de presentar sus preguntas y comentarios. Asimismo, el público podrá enviar sus preguntas y comentarios hasta el **25 de mayo de 2021**.

LOGÍSTICA DE LA REUNIÓN: Si desea participar en la reunión por la plataforma Zoom o por teléfono:

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

- Por Zoom: https://bit.ly/Keeler_Administrator
- Por teléfono: +1-669-900-9128 Código de reunión: 998 7384 7226;

SERVICIO DE INTERPRETACIÓN DE IDIOMAS

Para solicitar el servicio de interpretación de idiomas o en el lenguaje de señas, comuníquese a más tardar el 3 de mayo con Marina Pérez al número telefónico (916) 322-4265.

ACCESIBILIDAD

Usuarios de los dispositivos de telecomunicaciones para sordos (TDD, *telecommunications device for the deaf*) pueden comunicarse con el servicio de retransmisión de California (*California Relay Service*) al número (800) 735-2929 o la línea de voz al (800) 735-2922.

MATERIALES PARA LA REUNIÓN

Los materiales de la reunión y los detalles para participar a distancia están a su disposición en: http://bit.ly/DDW_Administrator. Si desea recibir los materiales de la reunión antes del comienzo de la misma, por favor inscribese en: http://bit.ly/Keeler_updates. Antes de comenzar la reunión, los materiales se enviarán por correo electrónico a los partícipes *inscritos*.

CÓMO ENVIAR SUS COMENTARIOS (A MÁS TARDAR EL 25 DE MAYO DE 2021)

Por correo postal: Omid Rabbani
State Water Resources Control Board –
Division of Drinking Water
464 W 4th St, Room 437, San Bernardino, CA 92401

Por correo electrónico: DDW-Administrator@waterboards.ca.gov

CONTEXTO

El 13 de enero de 2021, la Junta Estatal del Agua inició el proceso de designar a Keeler CSD como un sistema de agua necesitado de un administrador. Esto se debe a que dicho sistema de agua no ha podido proveer de manera continua un abastecimiento de agua potable segura y asequible para sus usuarios. A causa de su infracción por exceder los niveles máximos de contaminación de arsénico, Keeler CSD debe acatarse a las órdenes vigentes emitidas para su cumplimiento con las normas establecidas. En la actualidad, y hasta que se pueda implementar una solución duradera, Keeler CSD provee agua embotellada a sus usuarios.

La Junta Estatal del Agua propone designar un administrador para que gestione las operaciones del sistema de agua de Keeler CSD. Todas las medidas implementadas por un administrador deben beneficiar los intereses de la comunidad de usuarios del sistema de agua y deben incluir:

- Facilitar el acceso a un abastecimiento de agua potable segura y económica;
- y
- Celebrar reuniones públicas un mínimo de cada tres meses.

Todo usuario abonado, inquilino o propietario quien reciba agua de un sistema de agua determinado puede solicitar que la Junta Estatal del Agua revierta o modifique alguna decisión del administrador, así como solicitar su reemplazo. Las descripciones de dichos procesos y de la autoridad del administrador se encuentran en el Código de Salud e Seguridad, artículo 116686, y en el Manual de Políticas del Administrador emitido por la Junta Estatal del Agua (Sept. 2019) ubicado en: https://bit.ly/SAFER_Administrator_Handbook.

Información sobre el administrador propuesto

NOMBRE DEL ADMINISTRADOR

Se ha identificado al grupo Provost & Pritchard como candidato viable al nombramiento de administrador para Keeler CSD. Sus competencias incluyen:

- Gestión, en todas sus facetas, de decenas de sistemas de aguas y distritos especiales, incluyendo la totalidad de necesidades técnicas, directivas y administrativas;
- Aptitud especializada, con respecto a la extensión y participación pública, para facilitar el dialogo con partes interesadas;
- Operadores empleados acreditados en tratamiento y distribución disponibles para proveer apoyo operativo; y
- Equipo compuesto por ingenieros, planificadores y técnicos con experiencia extensiva en la dirección y planificación de recursos hídricos, así como con la implementación de soluciones.

MARCO DE RESPONSABILIDADES Y PRESTACIÓN DE SERVICIOS

Éste será un Administrador con Autoridad Total conforme a lo descrito en el Manual de Políticas del Administrador, disponible en http://bit.ly/SAFER_administrator_handbook.

CONFLICTOS DE INTERÉS

Hasta la fecha, la Junta Estatal del Agua no ha hallado, ni el grupo Provost & Pritchard ha reportado, ningún conflicto de interés. En caso de que en algún momento se propusiera una acción que pudiera crear un conflicto de interés, el administrador tendrá la obligación de notificar a la Junta Estatal del Agua de dicho conflicto, así como a todo usuario abonado, inquilino y propietario quien reciba servicios del sistema de agua designado. Dicha notificación deberá ser presentada por escrito y 30 días antes de proceder con la acción en cuestión.

INFORMACIÓN ADICIONAL

Omid Rabbani (909) 888-4985, Omid.Rabbani@waterboards.ca.gov
Karen Nishimoto (818) 551-2049, [Karen Nishimoto @waterboards.ca.gov](mailto:Karen.Nishimoto@waterboards.ca.gov)
Sitio web de la Junta del Agua: http://bit.ly/DDW_AdminWebsite.

ATTACHMENT C

From: [Steve Spencer](#)
To: [Rabbani, Omid@Waterboards](mailto:Rabbani,Omid@Waterboards); [Sarah Lee](#)
Subject: RE: Administrator Interest for Keeler CSD
Date: Friday, June 4, 2021 2:31:59 PM

EXTERNAL:

Omid,
Yes, we are willing and ready to go. Thanks!

Stephen T. Spencer, PE
PROVOST & PRITCHARD CONSULTING GROUP
455 W. Fir Avenue
Clovis, California 93611
Phone: (559) 449-2700, Ext.111
Cell: (559) 676-6066
Fax: (559) 449-2715
e-mail: sspencer@ppeng.com
website: <https://provostandpritchard.com>

CONFIDENTIALITY NOTE

This communication and any accompanying attachment(s) are privileged and confidential. The information is intended for the use of the individual or entity so named. If you are not the intended recipient, then be aware that any disclosure, copying, distribution or use of this communication and any accompanying attachments (or the information contained in it) is prohibited. If you have received this communication in error, please immediately delete it and notify the sender at the return e-mail address or by telephone at (559) 449-2700.

From: Rabbani, Omid@Waterboards <Omid.Rabbani@Waterboards.ca.gov>
Sent: Thursday, June 3, 2021 5:05 PM
To: Steve Spencer <SSpencer@ppeng.com>; Sarah Lee <SLee@ppeng.com>
Subject: Administrator Interest for Keeler CSD

Hello Mr. Spencer:

I am reaching out to you to confirm Provost & Pritchard Consulting Group's willingness to be an administrator for Keeler Community Service District (CSD) pursuant to Section 116686 of the Health and Safety Code. Keeler CSD is a small severely disadvantaged community located at 165 Railroad Avenue, Keeler, CA 93530. Keeler CSD utilizes a single groundwater well to serve a population of 50 people through 67 service connections.

Thank you,

Omid Rabbani

Water Partnership Coordinator

Division of Drinking Water

464 W 4th St, Room 437, San Bernardino, CA 92401

O: 909-888-4985

C: 949-200-2296

F: 909-383-4745



Attachment 2. Draft Inyo County Designated Water System Contract

County of Inyo

Department of Auditor-Controller



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Section 1 – Statement of Work

Overview

This statement of work is for the Service Level Agreement (SLA) between the Department of the Auditor-Controller (A-C) and the Special District(district). The goal of A-C is to provide cost-effective, high quality services to the district.

Objective

The objective of this Statement of Work is to specify the terms and conditions associated with services, cost and other roles and responsibilities between the two parties. The provisions are in accordance with the guidelines established by the A-C.

Scope of Work

The A-C will provide Accounts Payable, Payroll, Audit Assistance, Receipts, and general accounting services.

Period of Performance

The period of performance shall begin on _____ and is subject to renewal on _____. This agreement may be revised by either party during this period should any scope of services or conditions change.

Services to be Provided

A-C agrees to provide services to the district. Key Functions within the area of service are provided in detail in Section 2 of the SLA.

District Responsibilities

In order to ensure high quality, timeliness, and successful delivery of service to its customers, the A-C requires the district to supply certain information/documents to the A-C. District responsibilities are provided in detail in Section 3 of the SLA.

Cost for Services

The costs for services is provided in Section 6 of the SLA

Audit Procedures

The A-C will work with independent auditor, paid by the district. The district agrees to meet with the A-C or independent auditor to address any corrective action, if needed.

Section 2-Services Provided

Accounts Payable- Payment Processing

1. Receipt and review of Authorization for Payment and invoices.
2. Issuance of warrant for payment to Vendor as requested.
3. Warrant cancellations and reissuance.
4. Process submitted journal entries for interdepartmental billings and/or corrections to budget. As well as providing assistance in creating journal entry templates upon request by the district.
5. Provide reports and data to help resolve billing/payment issues.
6. Report DE542 to State of California for all sole-proprietors, according to state law and requirements.
7. Year end closing process, which includes processing accruals.
8. Create annual 1099 Reporting on behalf of district, including mailing to vendor and reporting to the Internal Revenue Service.

Accounts Receivable

1. Handle receipt of payments according to applicable policies and procedures.
2. Process journal entries for fund transfers and revenue distribution. As well as providing assistance in creating journal entry templates upon request by the district.
3. Perform trust fund reconciliation for district's trust fund accounts.
4. Year end closing process, which includes processing accruals.

Biannual Outside Independent Audit

1. The A-C will solicit and contract with an Independent Outside audit firm to conduct a biannual audit.

Reports

1. Email Financial reports to district monthly. These will include: Budget to Actual, Account Director's Report, Transaction Listing, and Cash on Hand/Fund Balance Report
2. Upon Request, additional financial reports will be provided.
3. Provide copy of payment packages, which include the invoice(s) and related payment documents, as requested.
4. Provide copy of state reporting documents, example: DE542, Sales Tax Audit, Non-resident withholdings.
5. Report financial data to the California State Controller's Office as requested by that agency

Payroll and Personnel (if applicable)

1. Maintain payroll records according to the County's record retention policy.
2. Create and email a monthly payroll schedule, including pay periods, pay dates and deadlines to District.
3. Enter new employees into the County's Financial System, upon receipt of completed Special District Employment Change Authorization form.
4. Provide District with Employee's Identification Number.
5. Process monthly payroll warrants per established guidelines and schedules.
6. Provide wage payment via physical check or direct deposit/electronic funds transfer. Direct deposit established after employee completes the required Authorization Form(s).

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7. Process Child Support Court Orders and/or other Garnishment orders. Mail a copy to the employee's address on record and maintain a copy in the district's payroll file.
8. Issue payment to the Child Support Agency or Obligor for Garnishment orders.
9. Report payroll contributions and wages to CalPERS for retirement data and process payments to CalPERS(if applicable).
10. Withhold FICA and Medicare according to federal law.
11. Withhold Federal and State taxes upon request from employee. The County will process a Federal W4 form and State DE4 form as submitted by employee.
12. Process payment to US Treasury and State of California according to IRS and State regulations.
13. Provide copy of DE9 and DE9c State Reports and Federal 941 quarterly.
14. Provide wage statements or other payroll reports upon request by the district.
15. Complete W2 process annually according to federal requirements. This includes: Review and reconciliation, creation of forms, mailing to employees and electronic submission to the IRS.
16. Upon request and authorization from District, provide information as to outside agencies for subpoena and public records requests.
17. When necessary, cancel or void payroll warrants in accordance with A-C procedures.
18. Provide Workers Compensation Payroll information to districts.
19. Report payroll data to US Census annually upon request from the United States Census Bureau.

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20. Report payroll data to the United States Bureau of Labor Statistics upon request from that agency.
21. Report payroll data to the California State Controller's Office as requested by that agency.
22. Report payroll data to CalPERS on behalf of the Social Security Administration as requested by that agency.

Section 3 – District Responsibilities

Accounts Payable

1. Complete A-C's PEID (Vendor ID) form and submit with W-9 and if required, non-resident withholding form to create new Vendor ID.
2. Complete Authorization for Payment form, with the required approval signatures.
3. Forward Authorization for Payment, along with invoices to the A-C for payment processing. If required, include Board minutes authorizing purchase.
4. Review monthly reports to ensure accuracy of payments.
5. Submit journal entry to A-C to correct any errors or discrepancies.
6. Complete A-C's Warrants Cancellation Request and Affidavit forms for cancellation of lost or destroyed checks.
7. Complete A-C's Warrants Cancellation Request form to request reversal of checks; and or reissuance to vendor.

Accounts Receivable

1. Follow Inyo County Cash Handling Policy and Inyo County Treasury Policies.
2. Create an Auditor Receipt Form for all funds to be deposited into Inyo County Treasury, including a reconciliation of checks and/or cash to be deposited, example: calculator tape or excel spreadsheet.
3. Deposit all funds in the Treasury. This may be completed in person at the Inyo County Treasury desk, via mail, or at the banking institution.

Department of Auditor-Controller

4. Review monthly reports to ensure accuracy of credit
5. Submit journal entry to A-C to correct any errors or discrepancies.
6. Complete billings for services at least monthly, noting date of service for accrual purposes.

Audit

1. District will provide requested data in a timely manner.
2. District will cooperate with inquiries from the Outside Independent Audit Firm.
3. District will maintain fixed assets lists and calculate depreciation.

Budget

1. District will provide a board approved operating budget within 60 days of the start of the fiscal year (July 1).
2. Provide an updated Authorized Signature Form
3. Provide a Salary Schedule for budgeted positions (if applicable)

Petty Cash

1. Balance petty cash monthly
2. Submit reconciliation of petty cash to A-C annually or as needed for reimbursement.
3. Follow the Accounts Payable requirements for reimbursement.

Payroll and Personnel (if applicable)

1. Maintain personnel services including employee recruitment, hiring and onboarding.
2. Verify eligibility for employment according to Federal and State and District regulations.
3. Complete I-9 Employment Eligibility Forms and maintain I-9 file.
4. Obtain Board approval and authorization prior to providing documentation to set up employee in County financial system.

Department of Auditor-Controller

5. Complete the Authorization for Payment form for each payroll period for wages to be paid to employees.
6. Submit completed Authorization for Payment forms and any backup monthly by the deadline.
7. Submit all status changes via Special District Employment Change Authorization form. This includes hiring, promotions, salary changes and terminations.
8. Forward completed Federal and State withholding forms to A-C for processing
9. Forward Direct Deposit Authorization forms to A-C for processing.
10. Complete form and submit to the State of California the DE-34 form within 20 days of hiring new employee according to State requirements.
11. Maintain Workers Compensation Insurance policy, claims, payments and complete quarterly reporting.
12. Maintain and track employee state required leave (sick, vacation, etc)
13. Track, maintain, and comply with all State and Federal laws regarding wages and benefits.

Department of Auditor-Controller

Section 4 - Auditor-Controller Contact List

AUDITOR

MAIN DESK 878-0343

P.O. Drawer R, Independence, CA 93526
Email: inyoauditor@inyocounty.us

Fax		878-0391	Independence	
Biggs	Grae	878-0343	Independence	gbiggs@inyocounty.us
Girardin	Kortni	878-0257	Independence	kgirardin@inyocounty.us
Huerta	Rusty	878-0254	Independence	ruerta@inyocounty.us
Martindale	Christie	878-0253	Independence	cmartindale@inyocounty.us
Orozco	Cindy	878-0343	Independence	corozco@inyocounty.us
Shepherd	Amy	878-0252	Independence	ashepherd@inyocounty.us
Silvas	Marissa	878-0259	Independence	msilvas@inyocounty.us
Ward	Shiela	878-0256	Independence	sward@inyocounty.us
Williams	Heather	878-0251	Independence	hwilliams@inyocounty.us

Draft

Section 5 - District Contact List

Board Chair _____
(Name)

(Email)

(Phone)

Organization Manager _____
(Name)

(Email)

(Phone)

Authorized Signer _____
(Name)

(Email)

(Phone)

Authorized Signer _____
(Name)

(Email)

(Phone)

Authorized Signer _____
(Name)

(Email)

(Phone)

Authorized Signer _____
(Name)

(Email)

(Phone)

Authorized Signer _____
(Name)

(Email)

(Phone)

Section 6 - Cost for Services

The A-87 costs to provide the above-named services to the Special Districts of the County of Inyo are \$ 163,594.00 for most recent state approved Cost Allocation Plan. These costs are not passed on to the following districts:

Big Pine Cemetery District
Tecopa Cemetery District
Independence Cemetery District
Mt. Whitney Cemetery District
Pioneer Cemetery District
Mesa Community Service District
Keeler Community Service District
Big Pine Community Service District
Lone Pine Community Service District
Darwin Community Service District
Sierra Highlands Community Service District
Starlite Community Service District
Olancha Community Service District
Big Pine Fire Protection District
Lone Pine Fire Protection District
Independence Fire Protection District
Southern Inyo Fire Protection District
Inyo-Mono Resource Conservation District
East Independence Sanitary District

Department of Auditor-Controller

Independent Auditors conduct bi-annual audits. The cost of this service is passed on and the cost will be based on the district's annual budget.

Costs associated with specialized payroll services (software and printing costs for annual fillings) will be passed onto the districts based on the district's annual payroll.

It is recognized that, from time to time, the district may have an additional or special request that falls outside the scope of this Service Agreement. In such cases the district and the A-C agree to establish a procedure to handle such requests.

Section 7 – Parties to the Agreement

By signing below, the District and the Department of Auditor-Controller agree to adhere to the principles established in this agreement

(Name)

(Name)

(Date)

(Date)

Chairman of the Board

Auditor-Controller

Section 8 - Attachments

Draft

Attachment 3. Rate Chart

Keeler Community Service District Water Rates

Parcels with active, developed home:	\$35.00 monthly
Occasional use and uninhabited parcels with a water connection TURNED OFF:	\$21.00 monthly
Undeveloped land, active water service:	\$15.00 monthly
Undeveloped (bare) land, without water connection:	\$12.00 monthly
Light Industrial:	\$85.00 monthly
New customer's installation of water box w/ valve	\$750.00

Water District installation of a POU (Point of Use filter) for structure on property is to be determined.

Attachment 4. Pre-Approval Vendor Form

PEID Request Form

Vendor Name: _____

Address: _____

Phone Number: _____

A DM code will be added to all PEID Requests

Goods Services Other _____

If the vendor is providing any kind of service, a W-9 is needed.

If the vendor is out of state but is providing services in the state of California, an Out of State Vendor form is needed.

Out of State Vendor: Yes No

If the vendor is out of state and charging sales tax, then their Sales Tax Permit Number is needed. This is *not* the Federal Tax Identification Number, so please make sure the vendor gives the correct information.

Sales Tax Permit Number: _____

Date: _____

Employee Name: _____

Department: _____

Phone Number: _____

Return form to: Auditor-Controller at inyoauditor@inyocounty.us

CLEAR

