

May 19, 2014

To: Lake Local Agency Formation Commission
Cc: Municipal Service Review Committee
From: Betsy Cawn
Subject: Comments on “Lake County Watershed Protection District, Public Review Draft, May 2014”

The following are my comments on the public review draft provided on May 14, 2014, for Lake LAFCo’s May 21, 2014 public hearing:

1. Page 7, 1st paragraph: “The Advisory Council meets quarterly, under the direction of an appointed chair and vice chair selected annually by the Board of Supervisors.”

Comment: The bylaws of the Council require an annual election of chair and vice chair by the Council members. The Council has not met since September, 2013, at which time it approved its 9th Annual Report for submittal under permit requirements. The formation of a newly required “Management Workgroup” (WQO 2013-0001-DWQ) has not occurred and the Year One permit compliance actions are pending decisions of the Central Valley Regional Water Quality Control Board for determination of the “urban boundary” of the MS4, and acceptable lake-wide monitoring requirements.

2. Page 7, 1st paragraph: “Workgroup recommendations are presented to the Advisory Council who then review and present recommendations to the County Board of Supervisors and both City Councils for final approval.”

Comment: There is no record of this action being taken since the 2005 joint meeting of all co-permittees in which implementation responsibility was delegated to the Watershed Protection District as “program manager” (Stormwater Program Agreement, 2003). The County Board of Supervisors, as the Board of Directors of the Watershed Protection District, has not reviewed new service requirements for compliance with WQO 2013-0001-DWQ, for which additional and yet-to-be-defined lake-wide monitoring and mapping are compliance requirements. Coordination of the newly required “Management Workgroup” by assigned staff is needed to meet annual permit management compliance requirements.

3. Page 7, 1st paragraph: “It is the responsibility of the cities and the County to implement the program as recommended by the Program Workgroups and Advisory Council and as adopted by the County Board of Supervisors and both City Councils.”

Comment: The WPD is the Program Manager under the Stormwater Program Agreement (2003); program implementation decisions made by the County Board of Supervisors and City Councils for allocation of funding to provide staff support, based on recommendations from the Advisory Council, would be helpful for permit compliance budgeting and to identify work loads for staff departments.

4. Page 7, 3rd paragraph: “Coordination of all efforts for compliance with the Minimum Control Measures and specified terms of the Water Quality Order is to be provided by a multi-jurisdictional management work group comprised of all MCM work group coordinators and the implementation team, which report to the

Advisory Council. However, in practice this step may not be fully realized presently.”

Comment: Various departments provide public education for delivery of their services (Public Health/Environmental Health, Public Services [solid waste disposal], Special Districts [LACOSAN], Community Development, Building Inspection, Public Works, and Water Resources [County Invasive Species and Lakebed Management divisions]). The Public Education & Outreach and Public Involvement & Participation work group is coordinated by a volunteer appointed by the Advisory Council in 2011. To date no specific funding has been established for conducting the County’s PEO/PIP program, but staffs of the co-permittees have supported the PEO/PIP work group to provide printed information and produce the annual compliance report for 2012-2013.

5. Page 7, Footnote 5: “Between 2004 and 2008, LCWPD acted as administrator of this program. In 2008, this function was transferred to the Community Development Department; however, LCWPD’s name was never removed from the agreements. Most recently, in 2013, this function was transferred back to LCWPD.”

Comment: The Lake County Stormwater Management Ordinance (No. 2772, 5/16/2006) Section 29-3(i) definition states: “Director: The Director of Community Development or such other department head designated by the Board [which board?] to enforce the provisions of this chapter.”

The Community Development Department coordinated the program from July 2009 to July 2013; transfer to LCWPD was approved by the Advisory Council in May 2013.

6. Page 8, 4th paragraph: “While LCWPD is not directly responsible for land use planning, which impacts future growth and development, the District makes recommendations regarding and takes part in the development of land use planning policies and documents.” . . . “It is also a policy of the Lake County Community Development Department Planning Division to consult with district staff to ensure new development is consistent with these plans prior to approval. [Footnote 7]”

Comment #1: An important determination of available groundwater supplies for new operations or developments is adequacy of the supply to meet existing demands and capacities for public health and safety services. Typically included in the “Initial Study” for a Major Use Permit application, the Department of Water Resources Engineer provides evaluation of impacts on a project by project basis. Continuous oversight of basin allocations and limitations by the District would be beneficial to protection of limited supplies.

Comment #2: Footnote 7 refers to Government Code 56033.5 - “Disadvantaged unincorporated community” means inhabited territory, as defined in Section 46046, or as determined by commission policy, that constitutes all or a portion of a ‘disadvantaged community’ as defined by Section 79505.5 of the Water Code.” Please provide the relevant citation; this reference may be useful for the multiple agencies seeking the definition for grant applications to a variety of agencies with unclear or conflicting definitions for economic evaluation of grant eligibility status.

7. Page 9, 2nd paragraph: “As a result of the economic impairments in the general population, financial resources for watershed protection and source quality management are inadequate to meet the compliance requirements of federal/state pollution prevention permits.”

Comment: Additional impairments burden the taxpayers of Lake County, such as environmental hazardous conditions and detrimental human activities especially (but not limited to) the first half of the 20th Century, for which remediations and/or mitigations are not feasible. State mandates for managing water as a primary asset throughout the state and in newly formed “regions” require new funding for which the District’s planning for financial growth is greatly needed. A “master plan” for services added to the former Flood Control District by unfunded state mandates -- for which the District was renamed -- is needed to define all service costs and determine additional sources of funding and methods of gaining them. At the time of District organization changes in 2005, the necessity for providing a “Plan of Organization” to establish new funding and management needs was not identified; consequently, many new mandated services were inadequately funded and several are lacking resources today. LAFCo may find that the state mandates cannot be met within the resource limitations of the District, which would assist in the state’s permit compliance program evaluation findings. (In fact both the state and federal agencies are quite sympathetic to this issue, and the Non-point Source Pollution scheme is entirely voluntary based on financial and technical capacities.)

8. Page 10, 2nd paragraph: “LCFCWCD was transformed into LCWPD in 2004 by passage of Senate Bill 1136, which amended Chapter 62 of the California Water Code to rename the District and empower it to provide additional services as described in Section 4 of the Act.”

Comment: At that time, the impacts of the requirements for additional services was not understood well enough to support development of a “Plan of Organization” that is sorely needed now, given changed and extremely challenging socio-economic and environmental conditions.

The “Plan of Organization” should “serve as a basis for decisions about the design, location, and priority of public programs, capital projects and other actions, including the allocation of [agency] resources,” “guide the development of [agency] functions,” “be developed through an inclusive and collaborative process, involving a broad range of stakeholders,” and “inform all other levels of government (local, regional, [state] and federal) of approved [agency] environmental goals and objectives and the proposed direction of [agency] programs and actions in achieving them.” (Adapted from the “Governor’s State Environmental Goals and Policy Report,” Government Code Sections 65041-65049.)

LAFCo’s assistance to establish the “Plan of Organization” is a function of its authority to approve a change of organization pursuant to the addition of new unfunded services in accordance with SB 1136 amendments to Chapter 62 of the California Water Code. (Government Code Section 56824.14.)

9. Page 11, 1st paragraph: “The District provides several core services as delegated or regulated in joint powers agreements and the County Code.”

Comment: New requirements of the state’s stormwater program permit (Water Quality Order 2013-0001-DWQ) include development of a “Program Management Plan” establishing the necessary legal authorities to implement compliance actions by all of the jurisdictional bodies responsible for compliance with the order, including the “program management” agency, which is the LCWPD.

The MSR for LCWPD can be very helpful to assist the District in identifying its service capacities and needs for additional support/resources, including development of contemporary organizational structure and inter-agency operations requirements. Currently, the LCWPD receives property tax revenues from all residents in both unincorporated and incorporated areas; incorporated areas are not the direct beneficiaries of services for which the property tax revenues are allocated to the “Flood Control & Water Conservation District” (former District name) by the Lake County Administration budget unit managers.

10. Page 11, 1st paragraph: “Responsibility for Clear Lake as a public trust asset was delegated to the County of Lake by the State Lands Commission (Chapter 639, Statutes of 1973).”

Comment: Responsibilities include “pollution prevention.”

11. Page 11, 1st paragraph: “Lakebed Management services are offered and defined by County Code Chapter 23 Shoreline Protection.”

Comment: Lake County’s “Shoreline Protection” ordinances include significant authorities that relate directly to compliance with the state’s stormwater program permit, such as Section 23-6.4(E): “Construction methods shall minimize disturbance of the underlying lands of Clear Lake and shall eliminate any subsequent siltation or other pollution resulting from the construction operations.”

The state’s 2013-2018 stormwater program permit requirements include a comprehensive review and revisions of all local regulatory instruments providing local permit compliance authority; overall authority for integrating the related legal instruments and their service capacity needs is the District’s opportunity to develop its “strategic plan” for watershed management *and* compliance with the State Lands Commission granted lands legislation.

12. Page 11, 4th paragraph: “As a dependent special district of the County, the District is governed by the County Board of Supervisors, which acts as its Board of Directors. As the District’s governing body, the Board authorizes its budgets and expenditures.”

Comment: The Board has not established the District’s budget and expenditures, per se. Budgets containing allocations to Department of Water Resources operations for providing program services used to meet Watershed Protection District functions are approved by the County Board of Supervisors during annual County budgeting by County Administration. Separation of the District’s budget and expenditures to establish the District’s Plan of Organization and provide effective understanding to the decision makers, public funding providers, and multiple agencies engaged in county-wide program and service delivery for legal mandates to protect Clear Lake and its source watershed resources would be highly beneficial to the District and its wide range of customers/stakeholders.

13. Page 11, 4th paragraph: “The Board of Supervisors meets concurrently as the Board of Directors of LCWPD (as with all other dependent districts) to consider items specific to LCWPD.”

Comment: As a “separate legal entity” the District should conduct public hearings separately from the County Board of Supervisors, to provide transparency and accountability to the public funders of the District (primarily the residents of Lake County), especially in light of the need for a “Plan of Organization” to establish its requirements under SB 1136 amendments to Chapter 62 of the California Water Code (2004).

14. Page 11, 5th paragraph: “Until recently, the Clear Lake Advisory Committee functioned to provide guidance and recommendations to the Board of Supervisors on matters related to Clear Lake.”

Comment: The Board of Supervisors decided to separate the Clear Lake Advisory Committee from its former relationship with the County’s “Coordinated Resource Management Committee (a.k.a, “RMC”) -- for which two Supervisors are appointed annually -- in 2009. The Committee struggled with development of work plans to support the Board’s direction of LCWPD programs, and to meet those work plans without the support of the Lake County Department of Water Resources, which rescinded its services to the Committee after its separation from RMC.

The Clear Lake Advisory Committee’s role in implementation of the “Clear Lake Integrated Aquatic Plant Management Plan” (2004 and current) and the “Clear Lake Integrated Watershed Management Plan” (2010) was insufficiently recognized during the Board of Supervisors change or organization decisions, and the Committee’s role as a conduit for public participation in meeting state stormwater and aquatic plant management permits was nullified. No replacement for that participatory and advisory process inclusive of public participation has been created, leaving the LCWPD without adequate resources for meeting two of the stormwater permit’s minimum control measures (for public education and outreach and public involvement and participation). LCWPD Board of Directors should identify its need for organizational input from the public, volunteers and permit compliance agency participants to define the appropriate advisory body for stormwater and aquatic plant management permit(s) compliance; extensive body of knowledge and community relationships established by the 20+ years of RMC and CLAC cooperative processes need to be continued in order for the LCWPD to meet the challenges of multi-jurisdictional, multi-disciplinary management of state mandated water quality management programs.

15. Page 12, continuation of 5th paragraph from Page 11: “At the beginning of 2014, the Board disbanded the Clear Lake Advisory Committee for a variety of reasons, including lack of a cooperative atmosphere among committee members contributing to an inability of the group to come to consensus on issues, and a frequent failure to establish quorum at meetings.” [Footnote 15]

Comment: The purported “reasons” for disbanding the CLAC are irrelevant to the MSR unless you include the other reasons for the Committee’s functional deficiencies (see item 15, above). A better recommendation for this paragraph is to identify the absence of the needed “citizens advisory groups” incorporated in the implementation statements of the CLIWMP and the Clear Lake Integrated

Aquatic Plant Management Plan, both of which are essential to meeting the state's stormwater and aquatic plant management permits, as stated above.

The LCWPD's need for input from knowledgeable and willing volunteers serving as the liaison between non-County agencies and the public still exists; the LCWPD MSR should identify that need in its findings, and the LCWPD should identify its requirements in presently non-existent District policies and procedures.

16. Page 12, 2nd paragraph: "It may be beneficial for the District to spearhead the revival of this organization [RMC], given the extensive regional coordination that is necessary to maximize impact of any watershed related programming."

Comment: The state's "Integrated Regional Water Management" program provided funding for development of the "Westside Integrated Regional Water Management Plan" (WIRWMP, 2013), in which the LCWPD is the legal entity for development of project funding from public funding resources such as Propositions 50, 84, and 1E (California Department of Water Resources voter-approved bond funds).

Ongoing (new) local discussions conducted by (publicly-funded) IRWM staff, for development of a "governance work group" to establish a "dialogue" among the agencies, organizations, and other stakeholders began in late last year, with formal meetings beginning on February 7, 2014.

The impetus for developing a "governance work group" in Lake County derives from incorporation in the WIRWMP project proposals a request to "update" the "Clear Lake Integrated Watershed Management Plan" (CLIWMP, 2010). The responsibility for accomplishing the update lacks identification of "lead agency" participation in the "governance work group" process, and the state's IRWM Regional Program Coordinator has stated that no one has "stepped up to the plate" for the task.

The CLIWMP itself does not identify the lead agency responsibility for implementation (and adaptive management) of the CLIWMP, which is the primary vehicle for identifying projects and programs to meet -- in part -- the state's stormwater and aquatic plant management permit requirements. A strategic plan for LCWPD operations development (in line with its incomplete "change of organization following enactment of SB 1136) should include this task, albeit unfunded, as a function of integrating its authorities for regulatory instruments such as the Stormwater Management, Floodplain Management, Groundwater Management, and Shoreline Protection ordinances.

Integration of these authorities under the LCWPD, updated in its guidance documentation (CLIWMP, WIRWMP, and others) should be a function of adopting an updated Lake County "Environmental Protection Guideline" (circa 1970's, updated most recently in 1982), Lake County Zoning Ordinances, Article 64. Lake County Zoning Ordinances are currently undergoing review and revision by the Lake County Community Development Department. This need represents another opportunity for establishing the LCWPD management planning for delivery of "new services" mandated by enactment of SB 1136.

17. Page 12, 4th paragraph: “Information regarding the District and the County Department of Water Resources (the department that staffs the District) is made available on the County website.”

Comment: No website pages are identified as belonging to the LCWPD, and no access is provided via Lake County Department of Water Resources web pages to documentation identifying LCWPD services, policies and procedures, information services (absent following changes of internal department reorganization of the Department of Public Works in 2009-2010). Examples of web page organization to accomplish this task are easily found on the County of Ventura’s Watershed Protection District website, so that no new creative effort is needed to provide this much needed organizational outreach and customer/stakeholder participation in implementing the state’s stormwater and aquatic plant management permits.

18. Page 12, 4th paragraph: “While comprehensive, it is often unclear whether it is the District or the Department of Water Resources program being discussed and the layout could be improved to align with major categories of services offered by the District.”

Comment #1: The Lake County Department of Water Resources web page “Department Background,” 1st paragraph, states:

“The Lake County Water Resources Department is responsible for two branches: the Lake County Watershed Protection District; [sic] and Lakebed Management. The Lake County Watershed Protection District (formerly known as the Lake County Flood Control and Water Conservation District) is a political subdivision of the State of California established under the Lake County Flood Control and Water Conservation Act, of the State Water Code in 1951. Under the County Board of Supervisors, which acts as its Board of Directors, the District is administered by the Water Resources Department.”

Comment #2: Well, there you have it (#1) -- the confusion lies in subordinating the District to the Department as a “branch,” without establishing its operations as a “separate legal entity,” providing the needed “change of organization” authorities from the Lake County Local Agency Formation Commission, and determining the District’s structure and funding requirements in its “Plan of Organization” (see comments above). As a separate legal entity created by enactment of SB 1136, the District has the authority to “contract with the County of Lake” for services, such as those provided by the Department of Water Resources. Clear accountability for program expenditures, based on standard contract management procedures used by the County of Lake to implement authorized spending of public funds for Capital Improvement programs, for example, compels the clarification of the District’s “business relationship” with the Department of Water Resources service providers, who also serve multiple agencies and other departments of the County of Lake.

19. Page 13, 1st paragraph: “The District was administered as a part of the County Department of Public Works until it was separated and made into an individual department by the Board of Supervisors in 2010. Named the Water Resources Department, this department is responsible for all functions of the LCWPD.”

Comment: Well, there you have it (#2) -- we need to look at the documentation of the decision making process conducted by the Board of Supervisors creating this structure, but the MSR should identify this confusion as a major issue for developing the LCWPD's structure, financial needs, and capacities to provide compliance with the state's stormwater and aquatic plant management permits, State Lands Commission delegation of responsibilities, and other local mandates established in County Codes.

20. Page 13, 2nd paragraph: "There are no regular volunteers that offer their services to the District; however, some volunteers occasionally assist with a stormwater and water sampling effort."

Comment: The LCWPD's role in multi-jurisdictional ("co-permittee") compliance with the state's stormwater management permit has been served by a volunteer appointed by the Lake County CLEAN WATER PROGRAM Advisory Council in 2011. The volunteer coordinated participation in the revision of the state's permit (Water Quality Order 2013-0001-DWQ) and production of the permit's "Annual Report" compliance document in 2013. The volunteer produces a monthly newsletter distributed to over 110 multi-agency participants in the CLEAN WATER PROGRAM's "Public Education & Outreach" and "Public Involvement & Participation" permit-mandated minimum control measures, and is a member of the state's project for development of its automated compliance documentation submittal software (that will be used by all stormwater management permit compliance agencies in the State). Status of all critical watershed management issues, such as the Regional Integrated Water Management Plan, local Invasive Species Program, and Lake County Watershed Protection District activities serves the stormwater permit's objectives for both minimum control measures, supported by staffs of the "co-permittees" responsible for implementation of the Lake County CLEAN WATER PROGRAM ("Stormwater Program Agreement," circa 2003).
http://www.co.lake.ca.us/Government/Directory/Water_Resources/cwp/documents.htm

21. Page 14, 2nd paragraph: "Overall functions of the District are not regularly reviewed or evaluated by the agency itself in the form of evaluating success in meeting goals or standards for services." "It is recommended that the District consider adopting standards by which to evaluate the success of its various projects and its effectiveness in achieving short- and long-term goals."

Comment: A specific requirement of the state's stormwater management permit is the evaluation of program effectiveness (Water Quality Order 2013-0001-DWQ). See previous comments regarding lack of District policies, procedures, and clear organizational responsibilities. The District as manager of the state's stormwater management permit is required to form a "Program Management Workgroup" in the current permit year, to determine responsibilities for implementing new permit requirements, including the program effectiveness evaluation component.

22. Page 14, 3rd paragraph: "For financial planning and accounting purposes, the District relies on the County's annual budget and annual financial audit, in which the District is included as a component."

Comment: This system is inadequate to provide transparency for accountability and currently includes only specific budget units for discrete services as-yet not evaluated for adequacy to meet mandatory regulatory requirements. See previous

comments directed to establishment of the needed “Plan of Organization” analysis and identification of funding requirements and organizational capacities to meet new service requirements added by enactment of SB 1136 and Water Quality Order 2013-0001-DWQ).

23. Page 15, 1st paragraph: “Budget Unit 8108 - Upper Middle Creek Basin.”

Comment: The budget unit is misidentified; the funding for this unit comes from property tax assessments paid by property owners in Flood Control Zone 8. The misidentification and mischaracterization of Budget Unit 8108 continues on Page 17, which states:

“Funding in this budget unit is used for operation and maintenance of the Upper Middle Creek Basin.” A similar misidentification is found in the fourth sentence of the paragraph and the table found on Page 18.

24. Page 19, 1st paragraph, item 6: “Watershed stewardship.”

Comment: “Watershed stewardship” services are not defined as such for cost allocations, staff assignments, task definitions, and program benefits explained in the text. Coordination of “watershed stewardship” programs to date has been provided by the East and West Lake Resource Conservation District’s “Coordinated Resource Management Plan” watershed-based citizen volunteer groups, under the direction of the RCD’s state-appointed watershed coordinator. Funding for that position and functions provided by the State Department of Conservation end this year. If the District is going to assume this function, it must identify capacities and needs to do so; the MSR is the right place to provide that identification need.

25. Page 19, 3rd paragraph: “As is often the case with agencies that provide resource management services, the extent and scope of the District’s services is often unclear to the general public.”

Comment: Please provide examples of the “agencies that provide resource management services” whose “extent and scope” of services are “often unclear to the general public.” I can provide many examples of agencies that provide resource management services that meet the requirement for state permitted resource management functions with clear and accessible information for the public, such as the Ventura County Watershed Protection District, Napa, Marin and Contra Costa County stormwater management entities, and so on. The LCWPD’s information resources and accessibility to the public lacks many attributes that are standard to a wide number of agency programs outside Lake County (and see previous specific comments regarding opportunities to provide clear communications regarding program and service programs *provided by the District.*)

26. Pages 20-22, table.

Comment: The listings within the table accurately reflect the lack of organization content found on the Lake County Department of Water Resources programs web pages, as reflected in previous comments. A detailed commentary on each item exceeds the time limits of preparation of this report, but using it as the basis for re-ordering the confusing list of “programs,” “plans,” and “services” would be beneficial for clarifying the District responsibilities now conceptually intermingled with those of the Lake County Department of Water Resources.

27. Page 23, 2nd paragraph: “As stated in the memorandum of understanding [for multi-agency participation in the Westside Integrated Regional Water Management Plan and resulting “Regional Water Management Group”], these agencies joined together with the intent of developing an IRWMP that will:

“Foster coordination, collaboration, and communication among entities responsible for water-related issues and interested stakeholders to achieve greater efficiencies, provide for integration of projects, enhance public services, and build public support for vital projects; and

“Assist in the development of a comprehensive plan to facilitate regional cooperation in providing water-supply reliability, water recycling, water conservation, water-quality improvement, stormwater capture and management, flood management, wetlands enhancement and creation, and environmental and habitat protection and improvements, and other elements and to obtain funding for plan development.”

Comment: Well, there you have it (#3) -- In the course of participation as the lead agency for Lake County Watershed Protection District programs, the District provided no multi-jurisdictional, multi-disciplinary agency or stakeholder services to develop the projects submitted by the Lake County Department of Water Resources based on the incomplete/outdated CLIWMP list, and has no program for conducting public participation in the regionally approved WIRWMP. Also see many previous comments in this regard.

28. Page 26, item 3-1: “The District appears to have minimally adequate capacity to handle present demand for services. The primary capacity constraint is limited financing for lakebed management services.”

Comment: The WPD MSR could be considered a “Stage 1” document, creating the opportunity to develop missing “Plan of Organization” analyses needed to obtain public support and technical capacities for obtaining a range of funding resources to address “demands for services” for which the District is responsible.

29. Page 26, item 3-2: “It appears that the District is providing adequate services given financial constraints, based on the breadth and quality of services provided, and professional management practices;”

Comment: Services are not adequate to meet multiple permit and management requirements. The District’s service capacities depend on competencies of staff in the County Department of Water Resources, including unfilled positions defined prior to enactment of SB 1136 “new service” mandates. Current staff services as defined in staff job descriptions are not provided adequately to meet the needs of public participation and involvement in supporting District programs.

30. Page 27, item 4-3: “It is recommended that the District’s budget units be summarized in the County budget for ease of public understanding.”

Comment: The District would benefit from public support for financing and compliance program implementation by meeting the definition of “local accountability and governance” described in the Governor’s Office of Planning and Research MSR Guidelines Appendices, page 7:

“The term ‘local accountability and governance’ refers to public agency decision making, operational and management styles that include an accessible staff, elected or appointed decision-making body and decision making process, advertisement of, and public participation in, elections, publicly disclosed budgets, programs, and plans, solicited public participation in the consideration of work and infrastructure plans; and regularly evaluated or measured outcomes of plans, programs or operations and disclosure of results to the public.”

<http://opr.ca.gov/docs/MSRAppendices.pdf>

31. Page 28, item 6-2: “Many of the District’s advisory committees and venues for public input have suffered from a lack of participation and interest, and have become inactive or have been formally disbanded. The District should review means to ensure continued stakeholder input and involvement in its functions.”

Comment: Well, there you have it (#4) -- first, the “District” as such has no advisories committees, has underutilized venues for public input (such as public hearings conducted by the District’s Board of Directors), and provides no public communication services for “stakeholder input and involvement in its functions.” In fact, stakeholder input and involvement in its functions was strongly supported by members of the Clear Lake Advisory Committee, including the volunteer who provides Public Education & Outreach and Public Involvement & Participation minimum control measures services to the Lake County CLEAN WATER PROGRAM managed by the District. Surely we can do this better, together, with LAFCo’s support to “help the district.”

Respectfully submitted,

Betsy Cawn
The Essential Public Information Center
Upper Lake, CA
707-275-9376
epi-center@sbcglobal.net