

Chapter 9: Comments Received

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Butte LAFCO welcomed public comments on this Municipal Service Review for Water and Wastewater Services in the Oroville Area. The public comment period for the Public Review Draft MSR was from May 5, 2023 to May 31, 2023, at total of 26-days. Written comments were invited to be submitted directly to LAFCO. Verbal comments were accepted during the June 1, 2023 public meeting. Public comments received during this formal comment period are addressed directly in this chapter in the Final MSR. Please see LAFCO's website at <https://www.buttelafco.org/> for additional details.


During the public comment period, LAFCO received four public comment letters as listed below.

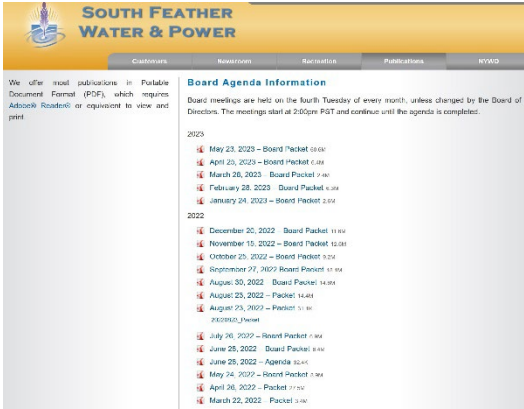
- South Feather Water and Power Agency, May 26, 2023, Table 9-1
- Thermalito Water and Sewer Agency, May 31, 2023, Table 9-2
- Cal Water, May 30, 2023, Table 9-3 (MSR Chapters 1-8)
- Cal Water, May 30, 2023, Table 9-3 (Appendix C)

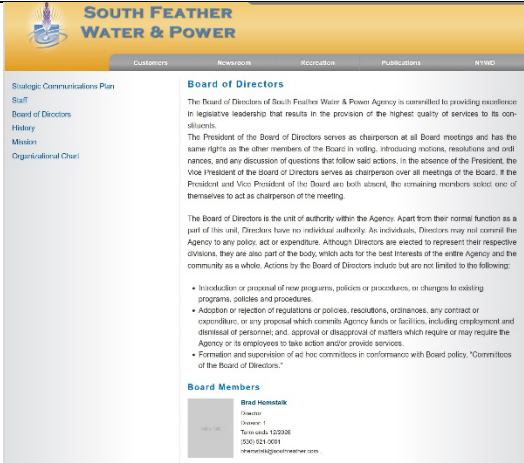
Each of these four letters and the response to these comments are detailed in the following pages.

9.1 South Feather Water and Power Agency

MSR for Water and Wastewater Services in Oroville Area, June 1, 2023

Table 9-1: Comments from South Feather Water and Power Agency, May 26, 2023					
#	Commenter/ Agency	Date	MSR Page Reference	Comment	LAFCO Consultant Response
1a	SFWPA	May 26, 2023	CH 6 Pg 6-3	Request adding to profile years 2021 and/or 2022 which reflect a more accurate analysis for such an important multi-year document.	<p>The MSR consultants utilized FY2020 as the base year for all of the service providers described in the MSR to retain consistency. However, to respond to this specific request, data for FY2021 was added to page 6-3.</p> <p>SFWPA has not posted its 2022 annual audit to its website as of May 30, 2023 (as shown in the screenshot below). Therefore, it is not currently available for analysis and inclusion in the MSR.</p> 
1b	SFWPA	May 26, 2023	Pg 6-6	South Feather agrees that the Sphere of Influence boundary should be coterminous with the Place-of-Use boundary. However, by applying for an	A sentence has been added to page 6-6 to note this comment.

				<p>expanded Place-of-Use boundary it will likely cause protest from another existing water service provider listed in the MSR and impact South Feather rate payers with unnecessary costs.</p>	
1c	SFWPA	May 26, 2023	Pg 6-9	<p>Agency active committees are readily available and selected and posted in multiple regular board meetings open to the public.</p>	<p>Commenter provided insufficient data about this request. Information about Board Committees are not posted to this webpage <https://southfeather.com/publications/agenda/> or this webpage <https://southfeather.com/about/board/> as of May 30, 2023, as shown in the two screenshots below. SFWPA may wish to consider updating its website to list committees of the Board in the future (this is an optional recommendation, and LAFCO does not "require" this). This information is simply helpful to the general public. No changes were made to the MSR text as a result of this comment.</p>  <p>The screenshot shows the 'Board Agenda Information' page on the South Feather Water & Power website. It lists board meeting dates and packet links for 2023 and 2022. For 2023, the most recent meeting listed is May 23, 2023. For 2022, the most recent meeting listed is March 22, 2022. The page also includes a note that board meetings are held on the fourth Tuesday of every month, unless changed by the Board of Directors, and start at 2:00pm PST.</p>

					
1d	SFWPA	May 26, 2023	Pg 6-12	<p>LAFCO would like to see fewer than 50 percent of a District's meetings list a closed session item. Comment -Under the Brown Act, closed session is an important protection of HIPPA privacy rights and attorney/client privilege.....</p>	<p>Thank you for providing this comment. The MSR's key performance indicators (KPIs) are not "requirements," nor are they intended to be punitive judgments. Rather, the KPIs give LAFCO a list of measures that could be studied in more depth in the next MSR for an agency. The KPI regarding closed sessions of the Board was chosen by the MSR consultant because it has successfully been used in MSRs for the El Dorado Irrigation District, City of Fairfield, City of Lincoln, and numerous other agencies throughout California. Additionally, the KPIs are helpful for allowing LAFCO to identify trends such as:</p> <ul style="list-style-type: none"> • Cross-comparison among different agencies, or • Analysis of multiple years (or MSRs) for one district. <p>For example, El Dorado LAFCo's MSR for the El Dorado Irrigation District (EID) found that: <i>"During the year 2019, the [EID] District Board held thirteen (48%) "Closed Sessions" noted on its agenda, primarily concerning property acquisition, litigation, and labor negotiations. The stated rationale for the</i></p>

					<p><i>closed sessions appears consistent with the provisions of the Brown Act."</i></p> <p>The MSR consultants recommend retention of the closed session KPI. However, 3 new sentences have been added to page 6-12 stating that "It is recognized that under the Brown Act, closed session is an important protection of HIPPA privacy rights and attorney/client privilege during potential or active litigation. An agency with the complexity and size of SFWP A will have closed session items on a regular basis. The stated rationales for the closed sessions appear consistent with the provisions of the Brown Act."</p> <p>The big picture with this KPI is that one of LAFCO's overarching goals is to promote good government. Good government policies are thought to prevent scandals such as those in the City of Bell (https://en.wikipedia.org/wiki/City_of_Bell_scandal). However, it is tricky to measure "good government". This is why the MSR uses multiple KPIs. If SFWPA has ideas to measure good government and transparency better, please talk with LAFCO's Executive Officer because your ideas could help both LAFCO and other agencies in Butte County. SFWPA is currently a role model for good government. However, even role models (such as SFWPA and LAFCO) have room for improvement.</p>
1e	SFWPA	May 26, 2023	Pg 6-17	Again, on closed session determination.	Please see the above response to comment on closed sessions.
1f	SFWPA	May 26, 2023	Pg 6-53	The content written determining seven water quality items exceed EWG Non-Regulated Health Guidelines is a	The MSR consultants disagree with this comment. The Environmental Working Group (EWG) is a well-respected organization. The information from EWG Tap Water Database is easily accessible to the general public on its website at

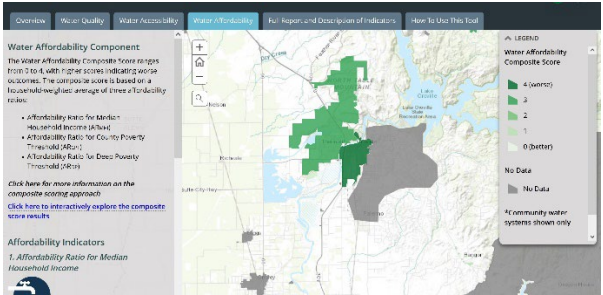
				<p>serious statement and frankly inappropriate.</p>	<p><https://www.ewg.org/tapwater/>. It is noted that the MSR also provides water quality information from the Safe Drinking Water Information website and the California Integrated Water Quality System Project, and these two data sources accurately describe the water quality associated with SFWPA's water. As a courtesy, given the concern expressed by SFWPA, the text regarding EWG has been removed from Chapter 6.</p>
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9.2 Thermalito Water and Sewer District

MSR for Water and Wastewater Services in Oroville Area, June 1, 2023

Table 9-2: Comments from Thermalito Water and Sewer District, May 31, 2023

#	Commenter/ Agency	Date	MSR Page Reference	Comment	LAFCO Consultant Response
2a	TWSD	May 31, 2023	7-18	The 2020 population for the District is 12,066.	Agreed. Table 7-5 correctly lists a population of 12,066 for the District. No changes were made to the MSR text as a result of this comment.
2b	TWSD	May 31, 2023	7-10	Compliance certificates for AB 1234 and AB 1825 are posted on the District's website	Agreed. Table 7-3 correctly notes the dates each Director received training. A link to the District's website is provided in the text above Table 7-3. No changes were made to the MSR text as a result of this comment.
2c	TWSD	May 31, 2023	7-33	Human Right to Water Data Tool results are concerning in that the District has no way to verify the conclusion presented. The score of 3, indicating "Poor" affordability is not backed by factual evidence. It seems an unfair characterization as the other water districts within the MSR are not compared to the same resource. Based upon the results of the 2018 Oroville Area Water Study, the District	The MSR's page 7-33 correctly notes that the Human Right to Water Data Tool is authored by the State of California, Office of Environmental Health Hazard Assessment, which has assessed various parameters for community water systems throughout the state. The Tool's website (https://oehha.ca.gov/water/report/human-right-water-california) extensively documents its data sources and references, including the U.S. Census. If TWSD disagrees with the data in the database, you are welcome to communicate concerns directly to the California Office of Environmental Health Hazard Assessment. Please note the use of this data is fair because it incorporates all public water agencies within the State. Please note the census tracts within the South Feather Water and Power Agency have higher household income and therefore water affordability is likely not a problem for the SFWPA. Affordability is also

				<p>had the cheapest actual cost for providing water service</p>	<p>a concern related to Cal Water's customers, as described extensively in Chapter 8 and as documented by the Human Right to Water Data Tool and as shown in the screenshot below:</p>  <p>A footnote has been added to Chapter 8 to document the Human Right to Water Tool as an additional reference regarding water affordability.</p> <p>The Tool's data shows on average, many community residents cannot afford to pay the current water rates in the TWSD Area. This should not be interpreted to imply that the water rates are either too high or too low. The calculations primarily relate to the ability of customers to pay the charges based on what is known about the average household income in the area. There are many vehicles to address the water affordability issue, including non-profits, academic studies, action by the state legislature etc. LAFCO is also one of these vehicles since the CKH Act directly mandates that LAFCO study disadvantaged communities. No changes were made to Chapter 7 as a result of this comment.</p>
2d	TWSD	May 31, 2023	7-86	<p>The District has a Capital Improvement Summary as well as a Capacity Analysis - Expenditures Report.</p>	<p>Thank you for this comment. A sentence has been added to page 7-86 to note that TWSD has a Capital Improvement Summary and a Capacity Analysis - Expenditures Report.</p>

2e	TWSD	May 31, 2023	Appendix C, Page C-4, Section 5	<p>RE: Only Drinking Water service reorganization: There are significant issues with the contention that SFWPA could simply consolidate all three water agencies. The District is currently funding a water treatment plant capacity upgrade which will double its treated water capacity. Furthermore, given the Feather River dividing service areas, it would be difficult to provide the necessary treated water volume across the river. If consolidation is to be recommended it should consider the full scope of financial, hydraulic, and operational challenges to overcome.</p>	<p>Appendix C presents seven conceptual options for future study. The seven options are informational only and may assist the Commission in considering future informational needs and next steps. When LAFCo moves to update an individual SOI at some future date, the Commission may also consider additional information beyond that presented in Appendix C. It is agreed that if a specific proposal to consolidate agencies is to be recommended to LAFCO at some future date, then it should consider the full scope of financial, hydraulic, and operational challenges to overcome. No changes were made to the MSR text as a result of this comment.</p>
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9.3 Cal Water (MSR Comments)

MSR for Water and Wastewater Services in Oroville Area, June 1, 2023

On May 30, 2023, Cal Water submitted two public comment letters. The first letter is 50 pages long and offers comments on the MSR Chapters 1 to 8. The second letter focuses on comments regarding Appendix C. Table 9-3 below provides responses to the comments from Cal Water's first letter, covering MSR Chapters 1 to 8. Due to the long length and repetitive comments, Table 9-3 below provides summary responses to the major issues raised by the commentor.

Table 9-3: Comments from Cal Water, May 30, 2023

#	Commenter / Agency	Date	MSR Page Reference	Comment	LAFCO Consultant Response
3a	Cal Water	May 30, 2023	Ch 8	It was not until December 2022 that Cal Water was asked to participate in the process, nearly two years after the other service providers were interviewed.	<p>The process for developing the MSR for Cal Water was very similar to the process utilized for all the service providers studied in this MSR. MSR consultants had only one meeting with each service provider studied in the MSR. An administrative draft MSR was shared with Cal Water on December 6, 2022. Ms. Harrison from SWALE Inc. spoke on the phone with Cal Water's Ms. Lind on December 16. Several Cal Water staff, LAFCO staff, and the MSR Consultants jointly conducted a zoom call to review Cal Water's comments on the Administrative Draft on January 25, 2023. Additionally, several emails were exchanged. Each service provider followed this similar process on different timelines.</p> <p>The 50-page length of Cal Water's comments indicates that Cal Water is concerned about the MSR. To acknowledge Cal Water's concerns, the following three sentences have been added to page 8-3 of the MSR:</p> <ul style="list-style-type: none"> • <i>"During the public comment period for this MSR, Cal Water submitted two public comment letters dated May 30, 2023, as provided in Chapter 9. In their letters, Cal Water articulated</i>

					<i>several concerns about this MSR chapter. Readers are invited to read about Cal Water's concerns in Chapter 9."</i>
3b	Cal Water	May 30, 2023	8-47	The draft incorrectly includes an entire section about a completely separate water utility that does not provide water service in Butte County, let alone Oroville.	The paragraph on page 8-47 entitled "Requested rate increase" has been replaced with the text provided by Cal Water in the comment.
3c	Cal Water	May 30, 2023	8-36 and 8-10	The draft speciously asserts that Cal Water's Urban Water Management Plan (UWMP) does not factor the effects of climate change into its water demand and supply projections.	All comments related to comment #3c (i.e., 2.0 to 2.7) are noted. Based on this comment, one sentence on page 8-36 has been slightly refined to read as follows: "The UWMP relies upon a large-scale model for the southwestern united states based on data from 2013 to consider the effect of climate change on water demand (Cal Water, 2020 UWMP, 2021)." A screenshot from Cal Water's UWMP is shown below to demonstrate the accuracy of this refined sentence. Please note that the MSR correctly reflects that Cal Water's UWMP describes the study that Cal Water is conducting regarding climate change (i.e., a 2016 study and Phase 1 level study). Please note that a Phase 1 level study is a preliminary analysis. When Cal Water completes its phase 2 and phase 3 studies that information can be included in future MSR or SOI updates conducted by LAFCO.

²² A&N Technical Services, 2014. Cal Water Long-Term Water Demand Forecast Model. Report prepared for California Water Service Company. December 2014.

²³ Table 4-9 uses climate scenarios for the southwestern United States. These in turn rely on alternative greenhouse gas emission scenarios. Emissions under scenario A2 are higher than under scenario B2. The 80th percentile scenario is the 80th percentile temperature change for the full suite of emission scenarios. For further information, see Kunkel, K.E, L.E. Stevens, S.E. Stevens, L. Sun, E. Janssen, D. Wuebbles, K.T. Redmond, and J.G. Dobson, 2013. Regional Climate Trends and Scenarios for the U.S. National Climate Assessment. Part 5. Climate of the Southwest U.S., NOAA Technical Report NESDIS 142-5, dated 2013.

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					<p>It is fine for Cal Water to have "expectations" about climate change. However, data and hydrologic models as proposed in Cal Water's Phase 2 and 3 studies would better serve as an information source once the full reports become publicly available. One new sentence has been added to page 8-10 to emphasize that Cal Water's UWMP was deemed complete by the Department of Water Resources. Another new sentence has been added to page 8-36 to note the climate-related information provided in Cal Water's comments. Comment #3c-2.6 is false. Also, the comment regarding "The draft's singular focus on Cal Water's climate change "is false. Chapter 8 is 60 pages long and contains over 17,000+ words. The words "climate change" are used in only five sentences, less than one percent of the chapter. Regarding complaints that Cal Water is somehow treated unfairly in comparison to SFWPA and TWSD with regard to climate change, please note that both SFWPA and TWSD: 1) control and manage their own water sources and associated watersheds and 2) participated in the Local Hazard Management Plan which analyzes in detail the effects of drought, fire, and other hazards related to climate change on their infrastructure and resources. The commenter expresses concern that the MSR is "critical" of Cal Water. The MSR is not critical; it simply suggests that further study of the issue is recommended. See also response to comment #3a.</p>
3d	Cal Water	May 30, 2023	8-16, 8-17, 8-42, 8-45, and 1-41	The draft speciously asserts that Cal Water's UWMP does not account for the population size of its current service area.	This comment presents a misreading of the MSR text. The MSR's section 8.4.1 "Existing Population," on pages 8-16 and 8-17 contains a detailed description of the population data provided in Cal Water's UWMP. However, given the dynamic variation in population in

					Oroville, the consultants recommend that when LAFCO next updates an MSR/SOI for services near Oroville, the population within Cal Water's service area should be re-evaluated compared to the service capacity. It is also noted that the commenter is concerned about the term "recently approved" in relation to Cal Water's service area. The sentence on page 8-42 has been refined to address this concern. The associated sentence on pages 1-41 and 8-45 has been deleted.
3e	Cal Water	May 30, 2023	8-31, 8-35	The draft speciously asserts that Cal Water's UWMP concludes that projected water demand under drought conditions would exceed projected water supply in 2045.	<p>This comment presents a misreading of the MSR text. The MSR's page 8-31 clearly states, "It is also noted that Cal Water staff indicate that available supplies are expected to be able to serve demands in all year types through 2045 (Cal Water, Jenkins, 2023)." Additionally, the MSR's page 8-35 clearly states, "Cal Water's 2020 UWMP indicates that the available supply is expected to be sufficient to meet the projected future demands of the service area in normal and multiple dry-year periods through 2045." Please note that Cal Water's UWMP does indicate the potential for water shortages as shown in the screenshot below:</p> <div data-bbox="1199 938 1896 1027" style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>The combinations of demand-reduction actions required to resolve the shortages associated with each of the six drought stages are based on Cal Water's experiences in dealing with past drought-related shortages and also include other actions deemed appropriate to achieve the required demand reductions. In order to evaluate and ensure that the right actions would be</p> </div> <p>Water districts in California face the compounding issues of drought, wildfires, climate change, and a growing population. The MSR describes these issues for water service providers in the Oroville area. The concern about Cal Water's projected water demand under drought conditions potentially exceeding the projected water supply in 2045 will need future study. When Cal Water completes its Water Supply Reliability Study (WSRS) and if those results become available to the public, then that data can be incorporated into the</p>

					next MSR or SOI that LAFCO conducts about Cal Water. No changes were made to Chapter 8 as a result of this comment.
3f	Cal Water	May 30, 2023	8-35, 8-36, 8-37	The draft includes a confusing and misleading summary of data from Cal Water's UWMP. Also, suggests re-writing a sentence to read as follows "Cal Water – Oroville's Urban Water Management Plan explains that it has a guaranteed supply of 3,000 Acre Feet per Year...	Please see the response to comment #3e, which also addresses the concerns raised in comment #3f. Please note that the commenter's use of the term "guarantee" is problematic because natural systems such as precipitation, evapotranspiration, and drought are highly variable and do not offer any guarantees. As a result, water rights in California are also not guaranteed and are sometimes referred to as "paper" rights. Therefore, the commenter's suggested sentence was not included in Chapter 8.
3g	Cal Water	May 30, 2023	8-42-8-44	The Determination on item CWS-PUB-1 relies on specious information from the draft MSR	One sentence has been deleted (see bullet point below) from Chapter 8's Determination on item CWS-PUB-1, and the next sentence has been re-written. <ul style="list-style-type: none"> The UWMP's projected future water demand calculations do not consider the effect of climate change on water demand.
3h	Cal Water	May 30, 2023	6-6, CH8	The draft includes misleading statements regarding the potential overlap and discrepancies between the service area boundaries of the three water suppliers reviewed in the MSR.	The commenter is objecting to a sentence in a 2006 MSR written by a consulting firm called "Kleinschmidt". Here is a screenshot from that 2006 MSR: <div data-bbox="1192 1036 1875 1133" style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>It should be noted that California Water Company (a private water district serving the City of Oroville) has extended its service area into a small portion of the northeast corner of the SFWPA service area, and provides domestic water service there.</p> </div> <p>If Cal Water objects to that sentence, the appropriate time to raise the concern would have been in 2006. Nevertheless, the commenter's suggestion for future research on the issue is understandable, and one sentence has been added to Chapter 6 to note this suggestion.</p>
3i	Cal Water	May 30, 2023	1-7	The draft speciously asserts that Cal Water	A minor correction to one sentence on page 1-7 has been made in the MSR text to address this concern.

				did not provide updated GIS data to the MSR Authors.	
3j	Cal Water	May 30, 2023	8-11, CH8	The draft incorrectly and misleadingly asserts that Cal Water's meetings are not broadcast over the internet.	<p>A footnote has been added to page 8-11 to share the information about Cal Water's meeting website.</p> <p>Throughout Cal Water's comments, there seems to be a fundamental misunderstanding about the difference between a "service provider" and a "regulating agency". Cal Water is the service provider and is the subject of this MSR. CPUC is the "regulating agency" and is NOT the subject of this MSR. LAFCO's never write MSRs about state agencies. LAFCO MSRs only focus on direct "service providers" in their local county. Meeting process, broadcasts, location, and/or schedule for the "service provider" are often described in MSRs. The meeting process, broadcasts, location, and/or schedule for the "regulator" is not under the purview of LAFCO and is not the subject of LAFCO's MSRs. Please see the CKH Act for additional information about the focus of MSRs. Information about CPUC was provided in Chapter 8 as a courtesy to Cal Water based on Cal Water's previous comments on the Administrative Draft Chapter.</p> <p>Please consider this example: the Regional Water Quality Control Board regulates the SFWPA. The RWQCB makes decisions on important subjects directly affecting SFWPA and its customers. However, the MSR Chapter for SFWPA does not focus on the RWQCB because the RWQCB is not a "service provider" and is not the subject of the MSR. Most water service providers in California are regulated to some extent.</p>
3k	Cal Water	May 30, 2023	1-12	The draft makes a specious and unfounded	Table 1-5 correctly notes that Cal Water's financial data disclosure is made to the CPUC in a different

				assertion that limited information about Cal Water is readily available to the public.	format and under a different frequency as compared to the other public service providers described in the MSR. Cal Water's financial data disclosure to the CPUC is confusing and buried on the CPUC website. Cal Water's Oroville District website at: https://www.calwater.com/community/oroville/ does not provide an annual audited financial statement focusing on costs, revenues etc., specifically for the Oroville District. Other service providers in the MSR have one website where their audited annual financial statements are directly available.
3L	Cal Water	May 30, 2023	1-12	Table 1.5 in the draft should be redrafted as it contains erroneous and misleading information.	Please see the response to comment #3k above. No changes were made to the MSR text as a result of this comment.
3m	Cal Water	May 30, 2023	1-33	The draft recommends that Cal Water duplicate research and analysis that has already been completed.	Thank you for the reminder that Cal Water did complete a 2017 analysis by Yarne & Associates. That report will likely continue to be useful to Cal Water over the next several years. There is no timeline mandated for the MSR's recommendation. When the recommendation is implemented in the future, Cal Water's 2017 Yarne & Associates report and associated data could potentially be utilized as context. No changes made to the MSR text as a result of this comment.
3n	Cal Water	May 30, 2023	1-40, 8-2	The draft makes a specious and misleading conclusion that there are no meeting schedules.	Please see response to comment #3j above. CPUC is not a service provider and is not the subject of this MSR.
3o	Cal Water	May 30, 2023	CH8	The draft inaccurately asserts that there are fewer opportunities for the public to participate in CPUC meetings.	Please see the response to comment #3j above. CPUC is not a service provider and is not the subject of this MSR.

3p	Cal Water	May 30, 2023	CH8	The draft's overview of accountability issues for Cal Water should be redrafted.	Please see the response to comment #3j above. CPUC is not a service provider and is not the subject of this MSR.
3q	Cal Water	May 30, 2023	8-50	...appropriately cite the statutory requirement that the CPUC review Cal Water's rates, operations, and proposed infrastructure improvements every three years.	Thank you for providing the Section citation for the California Public Utilities Code. This Section citation has been added as a footnote to page 8-50 in Chapter 8.
3r	Cal Water	May 30, 2023	1-42 and 8-53	The draft misstates Cal Water's organizational structure.	The sentence on page 1-42 and 8-53 has been corrected.
3s	Cal Water	May 30, 2023	7-94	The draft includes a superfluous and misleading statement regarding Cal Water's obligations to the local community.	The referenced sentence provided an example regarding low-income populations. Since the sentence was not necessary to support the paragraph's conclusion, it has been deleted per Cal Water's request.
3t	Cal Water	May 30, 2023	8-3	appropriately cite the portions of the California Constitution and Public Utilities Code.	The footnote on page 8-3 has been updated to add the text requested by Cal Water.
3u	Cal Water	May 30, 2023	8-4	The draft erroneously implies that the CPUC recently approved a change to Cal Water's boundary.	The date, 2014, has been added to page 8-4 and Figure 8-1.
3v	Cal Water	May 30, 2023	8-4	The draft erroneously implies that LAFCo has the authority to set, expand, and limit Cal Water's service area boundaries.	The sentence on page 8-4 has been refined to now read as follows: "This indicates that LAFCo did not wish to see the service area be expanded."

3w	Cal Water	May 30, 2023	8-9	The draft incorrectly states that Cal Water's supply contracts in Oroville are also for its service area in Chico.	The sentence on page 8-9 has been corrected per the commenter's request.
3x	Cal Water	May 30, 2023	8-11	The draft includes a confusing statement about the CPUC's rate-setting process.	The commenter offered several suggested sentences for page 8-11. The MSR authors slightly refined the sentences on page 8-11.
3z	Cal Water	May 30, 2023	8-11 and 8-13	The draft includes a lengthy discussion about Cal Water's leadership that is both inaccurate.	The commenter provides recommended text for Section 8.3.2 Company Leadership and Board on page 8-11. The recommended text was carefully considered by the MSR Authors. Several of the commenter's suggested sentences were incorporated into this Section 8.3.2. The suggested text regarding the Political Reform Act was inserted on page 8-13. Please also see the response to comment #3j above. CPUC is not a service provider and is not the subject of this MSR.
3aa	Cal Water	May 30, 2023	8-11, CH-1	...outdated and unsubstantiated information from LAFCO's 2006 MSR.	Please see the response to comment #3h. Also, please note that the commenter and LAFCO seem to have different definitions of the term "efficiency". Figure 1-1: Four Water Treatment Plants in the Oroville Area is an example of a situation that LAFCO would consider inefficient. Does a small community like the Oroville Area really need four drinking water treatment plants?
3bb	Cal Water	May 30, 2023	8-15, 8-16, 8-17	Determination on Item CWS-Acc-1 relies upon specious and misleading information	The MSR authors disagree with this comment. Please see response to comments #3aa, 3h, 3j, 3k, and 3a above.
3cc	Cal Water	May 30, 2023	8-29	The draft incorrectly states that Cal Water's construction of a new water well is contingent	The sentence on page 8-29 has been re-written per the comment.

				on the CPUC approving a rate increase.																												
3dd	Cal Water	May 30, 2023	8-33	aspirational language that is inappropriate for a planning document.	The word "Hopefully" has been deleted from page 8-33. The suggested sentence supplied by the commentor has been substituted in.																											
3ee	Cal Water	May 30, 2023	8-33	cite Cal Water's UWMP as concluding that it has sufficient water supplies in all hydrologic conditions through 2045.	A reference to the 2020 UWMP has been added to page 8-33.																											
3ff	Cal Water	May 30, 2023	8-36	The draft includes a misleading assertion that Cal Water failed to provide sufficient information.	The draft MSR's sentence is/was very neutral and did not imply any blame on Cal Water. However, the subject sentence has been refined in order to be more sensitive to Cal Water's perception on this item.																											
3gg	Cal Water	May 30, 2023	8-35	The draft incorrectly asserts that Cal Water does not have planned water supply projects in Oroville.	<p>The draft MSR correctly copied the 2020 UWMP. as shown in the screenshot from the UWMP below. The commenter is requesting unnecessary wordsmithing. No changes were made to the MSR text based on this comment.</p> <div style="border: 1px solid black; padding: 5px;"> <p>As shown in Table 6-7, there are no planned future water supply projects or programs that are expected to provide a quantifiable increase to the Oroville District's water supply.</p> <p style="text-align: center;">Table 6-7. Expected Future Water Supply Projects or Programs (DWR Table 6-7)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; text-align: center;">x</td> <td colspan="5">No expected future water supply projects or programs that provide a quantifiable increase to the agency's water supply. Supplier will not complete the table below.</td> </tr> <tr> <td></td> <td colspan="5">Some or all of the supplier's future water supply projects or programs are not compatible with this table and are described in a narrative format.</td> </tr> <tr> <td></td> <td colspan="5" style="text-align: center;">Provide page location of narrative in the UWMP</td> </tr> <tr> <th rowspan="2">Name of Future Projects or Programs</th> <th colspan="2">Joint Project with other suppliers?</th> <th rowspan="2">Description (if needed)</th> <th rowspan="2">Planned Implementation Year</th> <th rowspan="2">Planned for Use in Year Type</th> <th rowspan="2">Expected Increase in Water Supply to Supplier</th> </tr> <tr> <th>Y/N</th> <th>If Yes, Supplier Name</th> </tr> </table> </div>	x	No expected future water supply projects or programs that provide a quantifiable increase to the agency's water supply. Supplier will not complete the table below.						Some or all of the supplier's future water supply projects or programs are not compatible with this table and are described in a narrative format.						Provide page location of narrative in the UWMP					Name of Future Projects or Programs	Joint Project with other suppliers?		Description (if needed)	Planned Implementation Year	Planned for Use in Year Type	Expected Increase in Water Supply to Supplier	Y/N	If Yes, Supplier Name
x	No expected future water supply projects or programs that provide a quantifiable increase to the agency's water supply. Supplier will not complete the table below.																															
	Some or all of the supplier's future water supply projects or programs are not compatible with this table and are described in a narrative format.																															
	Provide page location of narrative in the UWMP																															
Name of Future Projects or Programs	Joint Project with other suppliers?		Description (if needed)	Planned Implementation Year	Planned for Use in Year Type	Expected Increase in Water Supply to Supplier																										
	Y/N	If Yes, Supplier Name																														
3hh	Cal Water	May 30, 2023	8-37	The draft incorrectly relies upon a non-existent water supply planning best practice.	The word "far" has been deleted from page 8-37. See also response to comment #3f.																											
3ii	Cal Water	May 30, 2023	8-49 to 8-50	The draft's calculation of the annual average water bill for Cal Water's customers is inaccurate.	A sentence has been added to page 8-48 to note that water conservation might result in reduce water rates as detailed in Cal Water's May 30, 2023 letter. The 2018 Water Service Study remains a useful reference																											

					<p>because it compares several water service providers. It was the best source of information available to the MSR authors at the time Chapter 8 was drafted. A MSR describes information based on a snapshot in time. The MSR's page 8-49 does indeed describe Cal Water's Customer Assistance Program. Due to time constraints, the MSR Authors are not able to verify the new rate and CAP data Cal Water provided. However, as a courtesy to Cal Water, a note has been added to Table 8-17 to indicate that Cal Water provided alternative calculations. This allows readers to see the information you provided directly. Although Cal Water's current rates may be lower than that shown in Table 8-17, Cal Water does petition the CPUC for water rate increases every three years. Therefore, it is also possible that water rates may rise in the future.</p> <p>Based on comments from TWSD and Cal Water, additional information about the Human Right to Water Data Tool, authored by the State of California, Office of Environmental Health Hazard Assessment, has been added to pages 8-49 to 8-50. Please see the response to comment #2c for additional information. The MSR recommends further study of the water affordability issue because it is a justifiable community concern.</p>
3jj	Cal Water	May 30, 2023	8-48	The draft erroneously concludes that many Cal Water customers are unable to afford their	On page 8-48 the word "cannot" has been replaced with the words "might not".

9.4 Cal Water (Appendix Comments)

MSR for Water and Wastewater Services in Oroville Area, June 1, 2023

On May 30, 2023, Cal Water submitted two public comment letters. Table 9-4 below considers the second letter from Cal Water which focuses on comments regarding Appendix C. Table 9-4 below provides a summary response to the comments from Cal Water.

Table 9-4: Comments from Cal Water, May 30, 2023 Regarding Appendix C

#	Commenter/ Agency	Date	MSR Page Reference	Comment	LAFCO Consultant Response
4a	Cal Water	May 30, 2023	C-2 to C-5	Appendix C recommends that LAFCo consider reorganizing the water providers in Oroville, including Cal Water, under one agency.	This comment is false. Appendix C offers a brief description of seven conceptual options for potential future study when LAFCO next updates a Sphere of Influence (SOI). When LAFCO updates a SOI in the future it may wish to consider one or more of these conceptual options or other options. Appendix C does NOT recommend any option. The commenter's May 30, 2023 letter is based on a misunderstanding of Appendix C.
4b	Cal Water	May 30, 2023	C-2 to C-5	Cal Water's business is not for sale. The only way to reorganize Cal Water under a government agency is with eminent domain. Initiating a hostile takeover of Cal Water using eminent domain would cost millions. Even a successful hostile takeover of Cal Water would increase water rates and taxes.	Comment noted. Please see the response to comment #4a above. Appendix C does NOT propose the following: <ul style="list-style-type: none"> • to purchase Cal Water • hostile takeover • use of eminent domain The above keywords are not mentioned or contemplated in Appendix C. There is no factual basis for the comments.

4c	Cal Water	May 30, 2023	C-2 to C-5	Comment mentions Cal Water's conservation programs and community support.	Cal Water's conservation programs – including substantial rebates, direct installation programs, and direct distribution, are notable and appreciated by many in the community, including LAFCO. Cal Water's statewide operations do provide benefits to its customers. Many in the community appreciate Cal Water's solid equipment and dedicated employees, including LAFCO. Cal Water's good work to support the local community during the 2018 Camp Fire is also noted.
4d	Cal Water	May 30, 2023	C-2 to C-5	References to the Inefficiency of Water Service in Oroville and the Efficacy of Reorganization of the Suppliers Under One Agency Should be Stricken from the Draft MSR.	<p>Comment noted. Please also see the response to comment #3a and #3aa. The MSR does NOT conclude that a takeover of the water systems in Oroville would result in improved efficiencies and/or that doing so would be safe for residents. The word "takeover" is not used at all in the MSR except by Cal Water in comment letters. Cal Water's comments seem to have jumped to a diverse array of odd conclusions.</p> <p>Chapter 5 of the MSR describes SC-OR, including its history and governance. At one time, the Oroville area had several wastewater treatment plants. However, it was more efficient for wastewater service providers to cooperate and jointly operate one wastewater treatment plant. SC-OR is a real example of efficiency from LAFCO's perspective. As a different example, improvements to old, leaky, or outdated water infrastructure could also be considered an efficiency improvement, since it improves water efficiency. Efficiency in management and operations are LAFCO concerns too. In closing, the MSR Authors and LAFCO appreciate the active participation of Cal Water in this MSR process.</p>

Chapter 10: Adopted Resolution

The Commission adopted Resolution # 24-2022/23 during its public meeting on June 1, 2023. The Resolution relates to the provision of water and wastewater services in the Oroville Area and is provided on the following pages.

CHAPTER 11: GLOSSARY

Acre-foot: The volume of water required to cover one acre of land to a depth of one foot. This is equal to 325.851 gallons or 1,233 cubic meters. An “acre-foot” of water usually supplies enough water to support two urban households for one year.

Appropriation Doctrine: In the western US, the doctrine of Prior Appropriation was in common use as early settlers and miners began to develop the land. The prior appropriation doctrine is based on the concept of “first in time, first in right”; meaning that the first person to use a quantity of water and put it to Beneficial Use has a higher priority of water right than a subsequent user. In drought conditions, high priority users are allocated water before junior users receive water. Appropriative rights can be lost through nonuse or transferred apart from the land.

Appropriative rights: Water rights based on the “Appropriation Doctrine”. Not related to riparian land ownership. In California and since 1914, a state-issued permit or license is required to establish appropriative rights.

Aqueduct: A conduit, pipe, or channel designed to transport water from a remote source, usually by gravity.

Aquifer: A below-ground geologic formation that bears water, stores water, and/or transmits water, such as to wells and springs.

Annexation: The annexation, inclusion, attachment, or addition of territory to a city or district.

Area of origin statutes: Statutes designed to protect counties and watersheds where the water originates, in the form of rain or snow, from the export of water outside the regions.

Average base flow (ABF): Flow in the sanitary sewer during dry-weather months, measured when no appreciable rain is falling. Base flow consists of sanitary flow plus groundwater infiltration.

Average dry-weather flow (ADWF): The 30-day rolling average wastewater flow from May through October.

Beneficial use: Includes irrigation, municipal, domestic, industrial, recreational use, and protection of fish wildlife and their habitat, and aesthetic enjoyment. The California Constitution (Article X, Section 2) requires that all water resources must be put to beneficial use, without waste or unreasonable use.

Best Management Practices: Best management practices are defined as methods or techniques found to be the most effective and practical means in achieving an objective (such as minimizing pollution) while making the optimum use of the District’s resources.

Board of Directors: The legislative body or governing board of a district.

Board of Supervisors: The elected board of supervisors of a county.

Bond: An interest-bearing promise to pay a stipulated sum of money, with the principal amount due on a specific date. Funds raised through the sale of bonds can be used for various public purposes.

Buildout: The maximum development potential when all lands within an area have been converted to the maximum density allowed under the General Plan.

CFS: Abbreviation for cubic feet per second. Used to describe a rate of the flow in streams and rivers. One "cfs" is equivalent to 7.48 gallons of water flowing each second. Also, equal to a volume of water one foot high and one foot wide flowing a distance of one foot in one second.

City: Any charter or general law city.

Consumptive use: Any use of water that permanently removes water from the natural stream system. 2. Water that has been evaporated, transpired, incorporated into products, plant tissue, or animal tissue and is not available for immediate reuse.

Conveyance loss: Loss of water from a channel or pipe during *conveyance*, including losses due to seepage, leakage, evaporation and transpiration by plants growing nearby.

Consolidation: The uniting or joining of two or more districts into a single new successor district. In the case of consolidation of special districts, all of those districts shall have been formed pursuant to the same principal act.

Contiguous: In the case of annexation, territory adjacent to an agency to which annexation is proposed. Territory is not contiguous if the only contiguity is based upon a strip of land more than 300 feet long and less than 200 feet wide.

Cost avoidance: Actions to eliminate unnecessary costs derived from, but not limited to, duplication of service efforts, higher than necessary administration/operation cost ratios, use of outdated or deteriorating infrastructure and equipment, underutilized equipment or buildings or facilities, overlapping/inefficient service boundaries, inefficient purchasing or budgeting practices, and lack of economies of scale.

Crown (of the sewer): The upper portion of the sewer pipes.

Design flow: The selected flow condition for wastewater collection system design, determined by adding corresponding peak sanitary flow and peak groundwater infiltration. This is also referred to as peak dry-weather flow.

Detachment: The detachment, deannexation, exclusion, deletion, or removal from a city or district of any portion of the territory of that city or district.

Development Fee: A fee charged to the developer of a project by a county, or other public agency as compensation for otherwise-unmitigated impacts the project will produce. California Government Code Section 66000, et seq., specifies that development fees shall not exceed the estimated reasonable cost of providing the service for which the fee is charged. To lawfully impose a development fee, the public agency must verify its method of calculation and document proper restrictions on use of the fund.

Discharge: The volume of water that passes a given location within a given period of time. Usually measured in cfs.

Drainage basin: A watershed (land area) where precipitation runs off into streams, rivers, lakes, and reservoirs. A drainage basin may be identified by tracing a line along the highest elevations between two areas on a map, often along a ridgeline.

Dissolution: The dissolution, disincorporation, extinguishment, and termination of the existence of a district and the cessation of all its corporate powers, except for the purpose of winding up the affairs of the district.

District or special District: An agency of the state, formed pursuant to general law or special act, for the local performance of governmental or proprietary functions within limited boundaries. "District" or "special district" includes a county service area.

District of limited Powers: An airport district, community services district, municipal utility district, public utilities district, fire protection district, harbor district, port district, recreational harbor district, small craft harbor district, resort improvement district, library district, local hospital district, local health district, municipal improvement district formed pursuant to any special act, municipal water district, police protection district, recreation and park district, garbage disposal district, garbage and refuse disposal district, sanitary district, or county sanitation district.

Dry-weather flow: Wastewater flow monitored during the dry season, occurring May through October. Consists of sanitary flow and groundwater infiltration.

Excessive infiltration and inflow: The quantities of infiltration/ inflow that can be economically eliminated from a wastewater collection system by rehabilitation, as determined by a cost-effective analysis.

Evaporation: A physical process such that liquid water transforms to water vapor, including vaporization from water surfaces, land surfaces, and fields.

Evapotranspiration: Combination of evaporation from free water surfaces and transpiration of water from plant surfaces to the atmosphere.

Formation: The formation, incorporation, organization, or creation of a district.

Function: Any power granted by law to a local agency or a county to provide designated governmental or proprietary services or facilities for the use, benefit, or protection of all persons or property.

Functional revenues: Revenues generated from direct services or associated with specific services, such as a grant or statute, and expenditures.

FY: Fiscal year.

General plan: A document containing a statement of development policies including a diagram and text setting forth the objectives of the plan. In California, the general plan for a city or a county must include certain state mandated elements related to land use, circulation, housing, conservation, open-space, noise, and safety.

General revenues: Revenues not associated with specific services or retained in an enterprise fund.

Groundwater: Water under the earth's surface, often confined to aquifers capable of supplying wells and springs.

Incorporation: The incorporation, formation, creation, and establishment of a city with corporate powers. Any area proposed for incorporation as a new city must have at least 500 registered voters residing within the affected area at the time commission proceedings are initiated.

Independent Special District: Any special district having a legislative body all of whose members are elected by registered voters or landowners within the district, or whose members are appointed to fixed terms, and excludes any special district having a legislative body consisting, in whole or in part, of ex officio members who are officers of a county or another local agency or who are appointees of those officers other than those who are appointed to fixed terms. "Independent special district" does not include any district excluded from the definition of district contained in §56036.

Infiltration and inflow (I&I): The collective term used to describe the extraneous flow in a wastewater collection system from both rainfall-dependent infiltration and inflow or groundwater infiltration.

Infrastructure: Public services and facilities, such as pipes, canals, levees, water-supply systems, other utility, systems, and roads.

LAFCO: Local Agency Formation Commission.

Local Accountability And Governance: A style of public agency decision making, operation and management that includes 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.

Local Agency: A city, county, or special district or other public entity, which provides public services.

Management Efficiency: The organized provision of the highest quality public services with the lowest necessary expenditure of public funds. An efficiently managed entity (1) promotes and demonstrates implementation of continuous improvement plans and strategies for budgeting, managing costs, training and utilizing personnel, and customer service and involvement, (2) has the ability to provide service over the short and long term, (3) has the resources (fiscal, manpower, equipment, adopted service or work plans) to provide adequate service, (4) meets or exceeds environmental and industry service standards, as feasible considering local conditions or circumstances, (5) and maintains adequate contingency reserves.

Municipal Services: The full range of services that a public agency provides, or is authorized to provide, except general county government functions such as courts, special services and tax collection. As understood under the CKH Act, this includes all services provided by Special Districts under California law.

Municipal Service Review (MSR): A study designed to determine the adequacy of governmental services being provided in the region or sub-region. Performing service reviews for each city and special district within the county may be used by LAFCO, other

governmental agencies, and the public to better understand and improve service conditions.

Ordinance: A law or regulation set forth and adopted by a governmental authority.

Peak flow: Maximum measured daily flow. Commonly measured in cubic feet per second (cfs). Typically occurs during wet-weather events and can also be referred to as peak wet-weather flow.

Peak dry-weather flow (PDWF): Peak daily sanitary flow plus groundwater infiltration.

Peak wet-weather flow (PWWF): Peak daily wet-weather flow plus peak rainfall-dependent infiltration and inflow from rainfall events.

Peaking Factor: The ratio of peak hourly wet-weather flow to base flow

Per Capita Water Use: The water produced by or introduced into the system of a water supplier divided by the total residential population; normally expressed in gallons per capita per day (gpcd).

pH: A measure of the relative acidity or alkalinity of water. Water with a pH of 7 is neutral; lower pH levels indicate increasing acidity, while pH levels higher than 7 indicate increasingly basic solutions.

Plan of reorganization: A plan or program for effecting reorganization and which contains a description of all changes of organization included in the reorganization and setting forth all terms, conditions, and matters necessary or incidental to the effectuation of that reorganization.

Potable Water: Water of a quality suitable for drinking.

Prior appropriation doctrine: In dealing with water rights, the *prior appropriation doctrine* states that water rights are determined by priority of beneficial use. This means that the first person to use water or divert water for a beneficial use or purpose can acquire individual rights to the water. The rights can be lost through nonuse; they can also be sold or transferred apart from the land.

Principal act: In the case of a district, the law under which the district was formed and, in the case of a city, the general laws or a charter, as the case may be.

Principal LAFCO for municipal service review: The LAFCO with the lead responsibility for a municipal service review. Lead responsibility can be determined pursuant to the CKH Act definition of a Principal LAFCO as it applies to government organization or reorganization actions, by negotiation, or by agreement among two or more LAFCOs.

Proceeding: A course of action. Procedures.

Public agency: The state or any state agency, board, or commission, any city, county, city and county, special district, or other political subdivision, or any agency, board, or commission of the city, county, city and county, special district, or other political subdivision.

Public trust: The public's rights to many natural resources, including running water, the sea, and the shore. The Public Trust Doctrine traditionally applied to commerce and fishing in

navigable waters and has been expanded to include fish, wildlife, habitat, and recreation, and the preservation of natural resources and ecosystems.

Rainfall-dependent infiltration and inflow (RDI/I): Rainfall runoff from both infiltration and inflow sources that enter the wastewater collection system during and shortly after a rain event. RDI/I consists of stormwater inflow and rainfall-dependent infiltration.

Rate restructuring: Rate restructuring does not refer to the setting or development of specific rates or rate structures. During a municipal service review, LAFCO may compile and review certain rate related data, and other information that may affect rates, as that data applies to the intent of the CKH Act (§56000, §56001, §56301), factors to be considered (§56668), SOI determinations (§56425) and all required municipal service review determinations (§56430). The objective is to identify opportunities to positively impact rates without adversely affecting service quality or other factors to be considered.

Reorganization: Two or more changes of organization initiated in a single proposal.

Reserve: (1) For governmental type funds, an account used to earmark a portion of fund balance, which is legally or contractually restricted for a specific use or not appropriable for expenditure. (2) For proprietary type/enterprise funds, the portion of retained earnings set aside for specific purposes. Unnecessary reserves are those set aside for purposes that are not well defined or adopted or retained earnings that are not reasonably proportional to annual gross revenues.

Responsible LAFCO: The LAFCO of a county other than the Principal County that may be impacted by recommendations, determinations or subsequent proposals elicited during a municipal service review being initiated or considered by the Lead LAFCO.

Retained earnings: The accumulated earnings of an enterprise or intragovernmental service fund which have been retained in the fund and are not reserved for any specific purpose (debts, planned improvements, and contingency/emergency).

Riparian water right: The legal right held by an owner of land contiguous to or bordering on a natural stream or lake, to take water from the source for use on the contiguous land. The doctrine of riparian rights is an old one, having its origins in English common law. Riparian rights cannot be sold or transferred for use on non-riparian land.

RWQCB: Regional Water Quality Control Board.

SCADA: Acronym for Supervisory Control and Data Acquisition; a software application program used for process control and to gather real time data from remote locations. The SCADA System consists of hardware and software components. The hardware collects and feeds data into a computer with SCADA software installed. The function of SCADA is recording and logging all events in a file that is stored in a hard disk or sending them to a printer. If conditions become hazardous, SCADA sounds warning alarm.

Service lateral: A sewer connecting a building or house to the mainline sewer.

Service review: A study and evaluation of municipal service(s) by specific area, subregion or region culminating in written determinations regarding seven specific evaluation categories.

Sewage: The wastewater released by residences, businesses and industries in a community is commonly referred to as sewage. It is 99.94 percent water, with only 0.06 percent of the

wastewater dissolved and suspended solid material. The cloudiness of sewage is caused by suspended particles, which in untreated sewage ranges from 100 to 350 mg/l.

Sewer Information Maintenance and Management System (SIMMS): A computer program that provides a means of tracking and organizing sewer maintenance schedules.

Special Reorganization: A reorganization that includes the detachment of territory from a city or city and county and the incorporation of that entire detached territory as a city.

Specific plan: A policy statement and implementation tool that is used to address a single project or planning problem. Specific plans contain concrete standards and development criteria that supplement those of the general plan.

Sphere of influence (SOI): A plan for the probable physical boundaries and service area of a local agency, as determined by the LAFCO.

Sphere of influence determinations: In establishing a sphere of influence, the Commission must consider and prepare written determinations related to present and planned land uses, need and capacity of public facilities, and existence of social and economic communities of interest.

Stream: A body of flowing water or natural watercourse containing water at least part of the year. In hydrology, it is generally applied to the water flowing in a natural channel as distinct from a canal.

Streamflow: The water discharge that occurs in a natural channel. A more general term than runoff, streamflow may be applied to discharge whether or not it is affected by diversion or regulation.

Stormwater runoff: Rainwater which does not infiltrate into the soil and runs off the land.

SWRCB: State Water Resources Control Board.

Total Dissolved Solids (TDS): A quantitative measure of the residual minerals dissolved in water that remains after evaporation of a solution. Usually expressed in milligrams per liter.

Treated water: Raw water which has been treated for human consumption through secondary or tertiary processes at a water treatment plant (WTP).

Watershed: An area of land that drains water, sediment and dissolved materials to a common receiving body or outlet. The term is not restricted to surface water runoff and includes interactions with subsurface water. Watersheds vary from the largest river basins to just acres or less in size. In urban watershed management, a watershed is seen as all the land which contributes runoff to a particular water body.

Zoning: The primary instrument for implementing the general plan. Zoning divides a community into districts or "zones" that specify the permitted/prohibited land uses.

CHAPTER 12: ACKNOWLEDGEMENTS

Several people contributed information that was utilized in this Municipal Service Review.

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Land Acknowledgment

The Butte County area is the ancestral lands of the Maidu tribes. The authors of this report recognize and respect Indigenous Peoples as traditional stewards of this land and the enduring relationship that exists between Indigenous Peoples and their traditional territories.