



February 11, 2015

VIA E-MAIL: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Ms. Jeanine Townsend

Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-100

RE: **2/17-18/15 BOARD MEETING Item #6** - Consideration of a proposed Resolution to amend the Policy for Implementing the Clean Water State Revolving Fund

Dear Chair Marcus and Members of the Board:

The Hi-Desert Water District is working diligently to implement a new wastewater collection, treatment, and reclamation system for the small disadvantaged community of Yucca Valley. At present, there are no centralized wastewater facilities in Yucca Valley; the town relies on septic systems for the disposal of commercial and residential wastewater. These septic systems are linked to nitrate contamination of the groundwater basin, and Yucca Valley is subject to a septic discharge prohibition in May 2016, per a basin plan amendment adopted by the Colorado River Basin Regional Water Quality Control Board in May 2011.

Board Item #6, on the February 27, 2015 agenda, would make many changes to the Clean Water State Revolving Fund policies. Of concern to us is the proposal to require two appraisals plus an independent review for the cost of acquisitions and easements to be eligible for CWSRF funding. The footnote on page 29 of Exhibit A includes language reflecting the possibility of waiving the requirement for two appraisals when the purchase price is less than \$5,000.

As part of our project, the District must acquire a total of 349 easements, each requiring its own appraisal. Under the Code of Civil Procedure section 1263.025, we are required to pay reasonable costs, not to exceed \$5,000 for an independent appraisal ordered by the property owner. While appraisals for single family residences typically cost under



\$1,000, appraisals for commercial property frequently cost \$5,000. Also, easement appraisals are more complex and thus more costly.

The 349 easements we will need to acquire are comprised of 156 residential properties (44.7%), 65 commercial properties (18.6%), and 128 vacant parcels (36.7%).

To date, we have completed 135 appraisals and all appraised residential properties have easements valued at less than \$550. The highest value properties appraised to date have been commercial and vacant land, but none have exceeded \$7,000 in easement value.

We understand the desire to safeguard public funds, and the need for two appraisals for major acquisitions, such as large tracts of land for siting a treatment or reclamation plant is warranted. But it is not cost effective nor a good use of public funds to require 2 appraisals, costing up to \$10,000 in total, for properties that don't have an easement value of at least \$15,000. Therefore, we respectfully request that the waiver provision on page 29 of Exhibit A be amended to reflect that if the first appraisal determines an easement is valued at less than \$15,000, a second appraisal may be waived.

Without this change, the District will face thousands of dollars in increased appraisal costs for second appraisals with little contribution toward safeguarding public funds.

Thank you for your consideration of this request.



Bob Stadum, President

Hi-Desert Water District Board

Cc: Assemblymember Chad Mayes

Senator Jean Fuller

