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September 14, 2011  
*Sent Via Electronic Mail*

Charles Hoppin, Chair and Members  
State Water Resources Control Board  
1001 I Street, 24th Floor [95814]  
P.O. Box 100  
Sacramento, CA 95812-0100

Attn: Ms. Jeanine Townsend  
Clerk to the Board  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



**Re: 9/19-20/2011 BOARD MEETING - ITEM 9**

**Consideration of a proposed Resolution adopting emergency regulations revising the core regulatory fee schedules contained in Title 23, Division 3, Chapter 9, Article 1, Sections 2200 and 2200.6, and adding Section 2200.7 of the California Code of Regulations.**

Dear Chair Hoppin and Board Members,

Ironhouse Sanitary District (ISD) is writing today to express our concern over the very large proposed fee increases and to urge the State Water Board to explore and implement more cost effective approaches to regulation, both in its implementation and administration.

ISD holds three separate permits, NPDES, WDR, and SSS WDR. The fee increases proposed will have a major financial impact to ISD. In this economy where ISD and most other public agencies and business are being forced to cut costs, limit rate increases, and reduce staffing, such large rate increases are reprehensible and not sustainable.

ISD strongly opposes the proposed fee increases and urges the State Water Board to seriously evaluate and consider measures to reduce the cost to implement its programs and programmatic measures to reduce the cost of unnecessary regulations to the regulated community.

Sincerely,  
IRONHOUSE SANITARY DISTRICT

Jennifer Skjel  
District Engineer