



# Plumas County Environmental Health

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Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000



[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Re: COMMENTS REGARDING REVISED PROPOSED DRINKING WATER FEE REGULATIONS

Plumas County Environmental Health is pleased to offer comments regarding the revised proposed drinking water fee regulations.

As previously noted, Plumas County is one of 30 Local Primacy Agencies (LPA) for the small public drinking water program. As an LPA, we have delegated authority and responsibility for overseeing the delivery of safe drinking water for approximately 100 small public water systems throughout Plumas County.

Environmental Health acknowledges the revised proposed fee regulations provide much needed fee relief for some small community water systems serving disadvantaged communities (DACs). However, the proposed fee regulations do not apply to all disadvantaged communities throughout California. As proposed, the revised fee regulations create a disparity between similar systems located in LPA and non-LPA counties. For instance, a system located in a non-LPA county serving a DAC of less than 100 connections would pay the proposed annual fee of \$100, which is far below the state or local cost of providing the service. A similar system in an LPA county would be subject to the local fee, which can be up to 10 times the cost of the subsidized fee.

State Water Resources needs to ensure ALL disadvantaged communities throughout California are eligible for this state drinking water fee subsidy. Understanding that LPA counties do not have access to the Safe Drinking Water Account nor can they bill larger systems to achieve economies of scale and equitable fees on a per-customer basis, LPA counties must charge their actual costs to provide regulatory oversight services. Extending the subsidy to disadvantaged communities in LPA counties means State Water Resources needs to provide sustainable funding to eligible LPA counties. The California Conference of Directors of Environmental Health is currently polling LPA counties to determine the size and number of disadvantaged communities within those counties, and the approximate costs of providing the mandated oversight services. In Plumas County, the number of small (less than 200 service connections) disadvantaged community systems is approximately 12, and the cost to extend this subsidy to Plumas County DACs is estimated to be \$10,000 to \$12,000. The cost to extend this subsidy to all DACs statewide is preliminarily estimated to be approximately \$200,000.

In summary, LPA funding is critical not only to ensure similarly disadvantaged communities on either side of a county line are charged consistent and equitable fees, but it is also needed to help LPA counties ensure safe and wholesome potable water is delivered to all disadvantaged communities throughout California.

Thank you for the opportunity to provide comments on the proposed fee regulations. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gerald Sipe', with a long horizontal flourish extending to the right.

Gerald Sipe, Director  
Plumas County Environmental Health