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Martin E. Zvirbulis
Secretary / General Manager/CEO

June 16, 2016

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814



Sent via E-mail (Date) to DAS-DrinkingWaterFees@waterboards.ca.gov.

Subject: Comment Letter – Drinking Water Fees

Dear Ms. Townsend,

On behalf of the Cucamonga Valley Water District (CVWD), please accept these comments on the Proposed Drinking Water Fees Structure change. The purpose of this letter is to provide feedback regarding the proposed drinking water fee structure. We understand the challenges that face our state and appreciate the constraints under which the State Water Resources Control Board (State Water Board) is operating under; however, the proposed fee structure creates serious inequity and increased burden on our agency and our ratepayers. Under the proposal CVWD's estimates it annual fees would increase from \$19,000 to \$100,000, an increase of 426%.

The Association of California Water Agencies (ACWA) has released an alternative and more equitable fee structure which CVWD recommends in place of the State Board's proposal. Under ACWA's proposal costs would be more evenly distributed and in particular to smaller agencies who have historically needed more assistance from the State Board than larger agencies. Under ACWA's proposal, CVWD fees would increase from \$19,000 to \$75,000, still a substantial increase of 294%.

CVWD agrees that the Drinking Water Program must be adequately funded; however, any changes to the fee structure must ensure that all water systems receive an appropriate level of service in a timely fashion, provide for an accounting of State Water Board staff time and resource allocations, and preserve "fee payer equity." Since large water systems typically require less assistance from the program on a connection basis and the State Water Board has indicated it will devote more time to smaller systems that experience more problems, CVWD believes the revised fee structure should reflect this difference. Thank you for your consideration and for the open dialogue.

Sincerely,

Martin E. Zvirbulis P.E.
General Manager/CEO

Cc: Cucamonga Valley Water District, Board of Directors
Association of California Water Agencies
City of Rancho Cucamonga
City of Fontana
City of Ontario
City of Upland
Inland Empire Utilities Agency

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