

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX 75 Hawthorne Street

75 Hawthorne Street San Francisco, CA 94105-3901

Jeanine Townsend, Clerk to the Board State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95814 5-9-12
SWRCB Clerk

Re: 5/15/2012 Board Meeting- Volumetric Wastewater Pricing

Dear Ms. Townsend:

The United States Environmental Protection Agency, Region 9 (EPA) understands that most California households connected to centralized wastewater treatment systems are charged a flat fee for their wastewater service. We understand that the use of volumetric wastewater pricing has the potential to result in significant water conservation benefits. We've learned of a recent study commissioned by the Natural Resources Defense Council (NRDC) which concludes that converting to volumetric wastewater pricing across California could save over 283,000 acre-feet of water per year.

EPA's Sustainable Water Infrastructure Program encourages cost-effective water and energy efficiency efforts, and other management approaches, that enable water and wastewater utilities to operate effectively and in compliance with the Safe Drinking Water Act and the Clean Water Act. Substantial water and energy savings from volumetric wastewater pricing could also help California meet the Water Conservation Act of 2009 (SBx7-7) requirements and the goals set by the Water-Energy Climate Action Team under the Global Warming Solutions Act (AB32).

It's EPA's view that the feasibility of converting California's wastewater utilities from flat fee service charging to volumetric pricing is worth considering. We believe it would be worthwhile for the Board to encourage interested stakeholders, including affected wastewater utilities and advocates such as NRDC, to confer about the potential for a statewide policy on this issue and report back to the Board.

Sincerely,

Nancy Woo, Acting Director

Water Division