



Shasta County

(6/22/16) Public Hearing
Drinking Water Fee
Deadline: 6/22/16 by 5:00pm

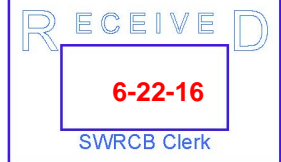
DEPARTMENT OF RESOURCE MANAGEMENT
1855 Placer Street, Redding, CA 96001

Richard W. Simon, AICP
Director

Dale J. Fletcher, CBO
Assistant Director

June 22, 2016

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



DAS-DrinkingWaterFees@waterboards.ca.gov

COMMENTS REGARDING PROPOSED DRINKING WATER PROGRAM FEE SUBSIDY REGULATIONS

Shasta County Environmental Health is one of 30 Local Primacy Agencies (LPA) for the small public drinking water program. As an LPA, we have State-delegated authority and responsibility for overseeing the delivery of safe drinking water for approximately 150 small public water systems throughout Shasta County. As the Environmental Health Director, I am keenly aware of the challenges facing small public water systems, especially those serving disadvantaged communities. While I understand the need to maintain affordable fees, the subsidized fee structure as the SWRCB proposed would have tremendous negative impacts on our local program, other LPA programs across the state, and small community systems in the counties served by Local Primacy Agencies.

The State's proposed fee structure appears to be far less than the State's cost of providing mandated oversight services for small public water systems whether or not they are severe disadvantaged communities. It is my understanding that reserves from the Safe Drinking Water Account will be used to subsidize permit and inspection fees for non-LPA county systems. Small and severely disadvantaged community systems in LPA counties, however, would not receive this funding from the Safe Drinking Water Account as your regulations are currently proposed, which seems unfair. Without the benefit of this funding for ALL small and severely disadvantaged communities systems Statewide, a severe disparity will be introduced and maintained between LPA and non-LPA counties. Considering 30 counties are designated as the LPA, this will adversely impact approximately half of the small drinking water systems in California.

The true costs for providing currently-mandated safe drinking water oversight services for small and severely disadvantaged communities have been known and can be estimated to be up to 10 times higher than the proposed subsidized fees. Mandated services currently include inspections, permitting, monitoring, surveillance, water quality evaluation, staff coordination, and data

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Jeanine Townsend
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management, with new service mandates and associated costs added each year. The true program costs are reflected by both the current SWR fee structure and the applicable permit fees-for-service charged by LPA counties. While our 2013 Grant Funding has been used for staff costs to comply with increased State data management mandates, we need to charge permit fees that cover the true costs of LPA staff and operations.

The SWRCB is proposing a reduced permit fee for a disadvantaged community in non-LPA counties serving fewer than 100 service connections of \$100. The same sized system permit fee in a LPA county, such as ours, is currently \$589/year. Faced with such a large difference between state and local fees, LPA counties would need to consider lowering oversight services, lowering local fees, or perhaps discontinuing the drinking water program – all of which is unreasonable and not what we can or want to do. We do not have funds locally to subsidize permit fees of this nature.

In summary, I do not support the concept of a subsidized drinking water permit fee for small and severely disadvantaged communities for only State over-sight in non-LPA counties, including State Small Systems. The fee needs to be based on a methodology that accounts for the true costs of providing the service. I would only support this fee reduction formula if funding was available to benefit all small and severely disadvantaged communities, in all counties, not just those located in non-LPA counties.

Thank you for the opportunity to provide comments on the proposed fee regulations.

Sincerely,



Carla Serio, REHS, Director
Environmental Health Division

CS/pw