



**California Association of
Environmental Health
Administrators**



July 29, 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

SUBJECT: COMMENTS REGARDING REVISED PROPOSED DRINKING WATER FEE REGULATIONS

These comments follow those provided by the California Association of Environmental Health Administrators (CAEHA) to SWRCB on June 21 and respond to the revised drinking water fees proposed by the SWRCB. Our comments are also closely aligned with those provided by Plumas County.

As stated before, CAEHA is acutely aware of the difficulties many of these small water systems face in meeting the primary drinking water standards and **supports** the State Water Resources Control Board's near-term goal of increasing compliance from 93% to 95%. CAEHA also **supports** reducing oversight fees for the smaller systems, particularly those that serve disadvantaged communities and recognize that some revisions to the current drinking water fee structure are necessary to achieve this.

Regrettably, the proposed revised fees may have an even **greater negative impact** on the locally run programs.

While the revised fee schedule does make a modest adjustment for the community water systems of 100 or fewer service connections it actually expands the category of disadvantaged community – thus including many more systems, particularly in the more rural parts of the state, that will only be paying \$100 to the State in fees. Again, as stated in our June 21 letter, our concern rests with the fact that the state's proposed fee structure appears to set at a level significantly lower than the actual state's cost of providing these mandated oversight services for small public water systems, whether or not they are serving disadvantaged communities.

We acknowledge that most, if not all LPAs have already had to set their fees higher than the state fee because they do not have the ability to offset their overhead costs from other fees in the drinking water program or from other non-fee funds that simply are not available to LPAs. The expansion of the definition of disadvantaged communities is going to make the disparity between state and local-run programs even greater.

Over the past month we have conferred with SWRCB staff and we have polled the LPAs. If we want to avoid increasing the disparity between state and local fees – especially for the disadvantaged communities – and if we want to prevent more LPAs from surrendering their program delegation, the state will have to subsidize local programs.

Our preliminary calculations put the necessary financial augmentation for all the LPAs at a very modest \$200,000 to \$300,000 per year above current fees. This does not account for any local fee adjustments that would likely have to be made once all the recent one-time augmentation for LPAs is depleted.

CAEHA looks forwards to discussing with the SWRCB how best to meet our collective goals and responsibilities.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Malan".

Justin Malan
Executive Director

Cc: CHEAC
HOAC
RCRC