



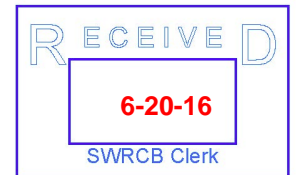
Plumas County Environmental Health

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June 20, 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

Re: COMMENTS REGARDING PROPOSED DRINKING WATER FEE REGULATIONS

Plumas County Environmental Health 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. As the Environmental Health Department's 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 fee structure as 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 serving disadvantaged communities. It is my understanding that reserves from the Safe Drinking Water Account will be used to subsidize oversight permit and inspection fees for non-LPA county systems. Small and severely disadvantaged community systems in LPA counties, however, would not receive the benefit of the Safe Drinking Water Account offsets as the regulations are currently proposed. Without benefit of this funding for ALL small and severely disadvantaged communities systems statewide, a severe disparity will be introduced between LPA and non-LPA counties. Considering 30 counties are designated as the LPA, this will have a negative impact on 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 are estimated to be up to 10 times higher than the proposed subsidized fees. Mandated services currently include inspections, permitting, monitoring, surveillance, water quality evaluation, and data 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 various fees for service charged by LPA counties. As proposed, the reduced permit fee for a disadvantaged community in a non-LPA county serving fewer than 100 service connections would be \$100. A similar 50 service connection, disadvantaged community system in Plumas County with treatment is currently charged \$532, and in some LPA counties the fee is \$800 or more. Faced with such a large difference between

state and local fees, LPA counties will be faced with a difficult choice to consider lowering oversight services, lowering local fees to less than the cost of providing the service, or perhaps discontinuing the small public drinking water program. None of these options are in the best interests of the State Division of Drinking Water, the LPA counties, or the communities we collectively serve.

In summary, I support the concept of a reduced drinking water permit fee for small and severely disadvantaged communities. However, the fee needs to be based on a methodology that accounts for the true costs of providing the service. Also, any fee reduction formula needs to benefit ALL small and severely disadvantaged communities, not just those located in non-LPA counties.

Plumas County and the other 29 LPA counties are valuable partners in providing safe drinking water to the public through local primacy delegation agreements. I stand ready to discuss options and opportunities with State Water Board staff to improve the proposed regulations.

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

Sincerely,



Gerald Sipe, Director
Plumas County Environmental Health