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August 19, 2014

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

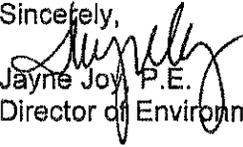
**SUBJECT: COMMENT LETTER – DRAFT DRINKING WATER SYSTEMS  
GENERAL PERMIT AND RESOLUTION**

Eastern Municipal Water District (EMWD) appreciates the opportunity to provide comment on the State Water Resources Control Board Draft National Pollutant Discharge Elimination System (NPDES) permit for drinking water systems. EMWD provides water and sewer services in western Riverside County. EMWD's drinking water is primarily imported from Metropolitan Water District or from local groundwater supplying about 160,000 service connections. EMWD's facilities are located in two Regional Water Quality Control Board (Regional Board) jurisdictions, namely, Santa Ana Region and San Diego Region. These Regional Boards have their own general permits for drinking water systems that have *de minimus* discharges. EMWD complies and reports under these two permits. Our primary concern is that the State's proposed permit adds additional requirements and costs to a well-functioning program. We recommend that the compliance requirements be clarified to ensure consistent regulatory requirements and that the fees be maintained at or near the current fee structure. Last year EMWD paid permit fees of \$4,124 for coverage under the two Regional Board's drinking water system permits. The State's proposed permit fee is \$20,000. This is nearly ten times higher than a discharge permit from one Regional Board and almost five times higher than our current costs.

In addition, EMWD has been following the California-Nevada Section of American Water Works Association (AWWA) effort to evaluate the proposed permit. EMWD supports the detailed comments and revised permit language provided in their comment letter.

Should you have any questions I can be reached at (951) 928-3777, Ext. 6241,  
or via email at [joyj@emwd.org](mailto:joyj@emwd.org).

Sincerely,

  
Jayne Joy, P.E.  
Director of Environmental and Regulatory Compliance

JJ: am

Submitted Via Email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)