



California

Rural Water Association

January 25, 2006

SSO Hearing: 2/8/06

Tam Doduc, Chair, and Members of the Board
State Water Resources Control Board
P.O. Box 100
1001 I Street, 24th Floor
Sacramento, CA 95814



SUBJECT: Proposed WDRs for Sanitary Sewer Collection Systems

Dear Chair Doduc and Members of the Board:

The California Rural Water Association (CRWA) is a statewide non-profit representing over 977 small water and wastewater systems. Our members are primarily systems with less than 3300 connections, serving communities with populations under 10,000.

We respectfully request the Board further investigate the impact these proposed regulations will have on small, rural wastewater systems. Having reviewed the proposed waste discharge requirements (WDRs) we are deeply concerned with the cost of the program to small systems. Systems will see increased expenses associated with maintenance as well as new reporting, operation, and capital requirements. As you know, many of our systems have not been subject to wastewater permits issued by the State Water Resources Control Board (SWRCB) or regional boards in the past. Small systems, primarily in the rural areas, are already struggling with increased costs and regulatory complexities associated with wastewater operations. In addition they are trying to address their aging infrastructure with a smaller population unable to bear the costs of replacement.

CRWA is uniquely positioned to understand the needs of small communities as we have over 18 technical field staff members offering on-site training and technical assistance to California's rural water and wastewater systems. CRWA is eager to be a resource during future deliberations and we are confident our expertise in serving these systems will be helpful to your staff as they revise the regulations.




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We support the concept of having statewide WDRs for collection systems and, like the SWRCB, are committed to protecting public health and the environment. We commend you for undertaking the development of these regulations and are optimistic that a revised final draft that incorporates the reality of smaller communities is achievable.

Thank you for giving us the opportunity to submit our brief comments.

Most sincerely,

A handwritten signature in cursive script that reads "Catherine Smith". The signature is written in black ink and is positioned above the printed name and title.

Catherine Smith
Executive Director