



**CALAVERAS
COUNTY
WATER
DISTRICT**

BUSINESS OFFICE

423 EAST ST. CHARLES STREET
POST OFFICE BOX 846
SAN ANDREAS, CALIFORNIA 95249
(209) 754-3543
FAX (209) 754-1069



SSO Hearing: 2/8/06

January 25, 2006

Selica Potter, Acting clerk to the Board
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: COMMENT LETTER – 2/08/06 PUBLIC HEARING FOR SSORP

Calaveras County Water District wishes to join with its sister agencies up and down the state to express concerns about some aspects of the new General Waste Discharge Requirements implementing the State's Sanitary Sewer Management Program (SSMP). While the District believes that the public needs protection from sewage spills, this regulation goes too far, too fast leaving local agencies vulnerable to fines by regulatory agencies without providing protection from lawsuits brought by outside interest groups.

The District shares the concerns stated in the comment letters from CASA and CVCWA, but wishes to highlight its own concerns in this letter.

COST CONCERNS

The District owns and operates thirteen collection systems scattered around Calaveras County for 4,000 customers. These systems include 45 pump stations, 135 miles of pipe and 600 septic tanks. The District has already begun a comprehensive investment into staff and equipment to better operate and maintain those collection systems. It has developed its own spill response procedure and increased its routine surveillance of key collection system components.

We are one of the rural counties for whom the \$6.00 per month per customer estimated compliance cost is ludicrous. This regulation will force us to add even more staff and equipment at great expense to our rate-payers. Personnel costs alone will be on the order of \$10.00 per month per customer. The cost for vehicles, equipment and supplies will add about another \$5.00 per month per customer – so CCWD monthly customer costs will be in the \$15.00 range to fully implement this regulation. This is not a rate increase easily affordable by customers in rural counties.

DUPLICATION OF EXISTING REGULATIONS

The District is under the regulatory jurisdiction of the Sacramento Office of the Central Valley Regional Board – notorious for going beyond the minimum requirements of State and Federal laws to impose more stringent conditions in their permits. The new state SSMP regulation needs to make clear that all current collection system requirements in existing permits are rescinded in favor of those imposed by the new law. That puts all California agencies on a level playing field.

ANOTHER REGULATORY FEE

CCWD's 4,000 customers already pay nearly \$50,000 annually for regulatory fees for its 12 sewer systems, and its two general orders for the purpose of draining water storage tanks and flushing water distribution lines. Obviously, there will be another fee for SSMP oversight adding to this already onerous burden. The District considers these fees to be an end-run around the need for a statewide tax increase and decries this methodology of making special districts and agencies the "bad guy" to avoid raising taxes.

The District thanks the Board for the opportunity to provide comments on this important new regulation. As members of CASA and CVCWA we look forward to supporting those organizations as they continue to work with you to fine-tune it. If you have any questions about our comments, please call me at (209) 754-3543 ext 35.

Sincerely



Fred Bumett,
Operations and Regulatory Compliance

Cc: CASA
CVCWA
Larry Diamond, CCWD Interim GM

CALAVERAS COUNTY WATER DISTRICT

423 E. St. Charles St.

PO Box 846,

San Andreas, CA 95249

(209) 754-3543

Fax (209) 754-9620

TRANSMITTAL

Date: January 25, 2006

Number of pages including cover sheet: 3

To: Selica Potter, Acting Clerk to the Board
State Water Resources Control Board

Phone:

Fax phone: 916-341-5620

CC:

Re: Comment Letter - 2/08/06 Public Hearing for SSORP

From: Fred Burnett

Operations

Phone: (209) 754-3543 Ext. 35

Fax phone: (209) 754-9620

REMARKS:

For your use

For your review

For Your Action

Please comment

Large empty rectangular box for remarks.