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

January 25, 2006

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 CVCSWA, 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new state SSMP regulation needs to make clear that all current collection system requirements in existing permits are rescinded in favor of those imposed by the new law.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.
ANTHER 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 decry 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 Burnett,
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
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TRANSMITTAL

Date: January 25, 2006
Number of pages including cover sheet: 3

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Re: Comment Letter – 2/08/06 Public Hearing for SSROP

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REMARKS: ☒ For your use ☐ For your review ☐ For Your Action ☐ Please comment