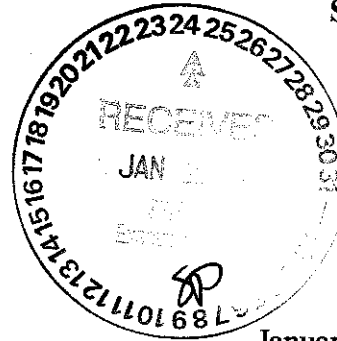


Board of Directors
 Markleeville Public Utility District
 P.O. Box 222
 Markleeville, CA, 96120



January 17, 2006

State Water Resources Control Board
 1001 I Street, 24th Floor
 Sacramento CA 95814

COMMENT LETTER -1/19/06 PUBLIC HEARING FOR SSORP

To Members of the Board:

We of the Board of Directors of the Markleeville Public Utility District (MPUD) have carefully reviewed the *Proposed Order No. 2006-?... Statewide General Waste Discharge Requirements for Wastewater Collection System Agencies* draft dated 12/5/2005 and the associated documents that were provided.

We strongly support the expressed aim of reducing SSO's to the lowest practicable level.

However, these proposed orders appear to be built on the assumption that one large size will fit all wastewater collection agencies. It seems pretty clear that tiny systems like ours were not considered in its creation. See the attached MPUD Vital Statistics sheet for a picture of how small we are.

As it says in the WDR Fact Sheet, it is easy to distribute the cost and effort of implementing these many requirements among tens or hundreds of thousands of customers. But our customer base is only 200 inhabitants, seven small businesses, and the Alpine County Court House. We have only 68 connections. Landlocked by public lands and very large private agricultural holdings, and with fewer than five unbuilt lots, we have no place to go for more operating revenue to cover these costly new mandates.

Our collection, treatment, and disposal systems all perform well. There is, of course, always room for improvement in some aspects of District operations, but there is little if any value to be added in terms of the goal of reducing SSO's; we have had none since year 2000. Available money and manpower are just sufficient to cover operation, maintenance, and existing regulatory mandates, and to slowly build cash reserves for future needs. Having endured a 50% rate increase less than three years ago, our customers will not accept a further increase in the near future. Our situation is stable, but would not take a great deal of added cost to destabilize it. It would be counterproductive to the intent of these orders if they force us to choose between paying to maintain our system or paying to implement them.

A principal concern with this Order is the Provisions (#11-15) requiring the preparation of an elaborate Sewer System Management Plan "by or under the direction of ... professionals" (which is very expensive), several of the specified features of the plan, and the time required of our unpaid volunteer Directors to participate in preparation, reporting, auditing, updating, and otherwise implementing these provisions.

Our experience with existing regulatory requirements has shown that it is already difficult to keep up with reporting and perform auditing at regular intervals. Turnover of responsible individuals is high, there is no central physical repository of such knowledge, and there is often no knowledgeable person available to perform them. Overworked volunteers do not work harder to meet increased demands; they simply quit. Simplicity is essential. Different reports to both the State and Regional Water Boards, and at differing intervals, greatly increase the probability that reports will be missed.

While it is usually feasible for us to submit reports electronically, we simply cannot guarantee that we will always be able to. Ownership and maintenance of a computer will always be beyond our District's financial reach, and volunteers cannot be required to use theirs. The option for reporting on paper simply needs to remain open.

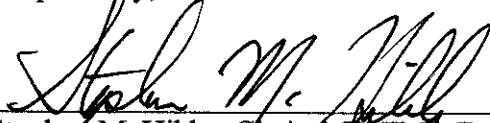
We only discuss the broad issues of concern here. The documents contain numerous individual items of lesser concern that we trust will be discovered and pointed out by others.

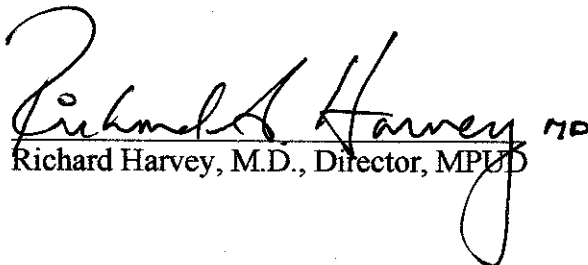
We have spoken extensively with our RWQCB (Lahontan) representative about these issues and come away with the conviction that we are not overinterpreting what we see.

We strongly suspect we are not alone. For our District, and possibly for other very small collection systems as well, a greatly abbreviated, simplified, and less costly response to the principal goals of this program is needed and would be appropriate to the size and resources available to such systems.

We suggest the formation of a separate working group, on which very small systems from around the state are strongly represented, to formulate a parallel plan tailored to their needs and capabilities while still addressing in simplified form the primary concerns that led the Water Board staff to believe an SSO Reduction Program is necessary. Please defer implementation of this Order for these small systems until a program scaled to their abilities is created.

Respectfully,


Stephen M. Hibbs, Chair, MPUD BoD


Richard Harvey, M.D., Director, MPUD


Deirdre Wallace, Director, MPUD

Attachment:
MPUD Vital Statistics

Cc: MPUD File
MPUD Directors
Mr. Robert Tucker, Lahontan RWQCB
Mr. Alan Miller, P.E., Lahontan RWQCB

Markleeville Public Utility District (MPUD)

Vital Statistics of a tiny public utility

1/06

- The MPUD serves the unincorporated community of Markleeville, which has only 200 inhabitants, seven small businesses, and Alpine County administrative offices.
- We have only 68 sewer service connections.
- We have only 5800 feet of sewer mains, one pumping station, and 300 feet of force main.
- Annual billable service fee revenue to cover operations, maintenance, regulatory mandates, and to build cash reserve is approximately \$36,000.
- Of Markleeville's 200 inhabitants, only about 30 are qualified to serve on the MPUD Board of Directors. Most have served at least once before.
- All Directors are volunteers serving without compensation.
- Markleeville is remotely located. Most support services are based in Reno, NV, approx. 70 miles away.
- Plant operation, secretarial services, and finances are all handled by local people who receive nominal compensation but also have other regular employment. It can be no other way; obtaining these services from outside our remote area is financially out of reach.
- The MPUD is one legal quarter-section, landlocked by public land and large agricultural holdings. There is no expansion on the horizon in service area or units from which to collect additional fee revenue.
- The MPUD does not own a computer and does not have dedicated office space. These are beyond our means, so we are not always able to deal with paperless communications. Secretary and Directors use their own computers (which are not always available for MPUD business) and work in their homes.