

5/2/06 - Item 7
SSDRP
Deadline: 4/24/06



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

April 13, 2006

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

COMMENT LETTER ON 5/3/06 BOARD MEETING - SSORP

To Members of the Board:

We of the Board of Directors of the Markleeville Public Utility District (MPUD) have carefully reviewed the Revised *Proposed Order No. 2006-?... Statewide General Waste Discharge Requirements for Wastewater Collection System Agencies* draft dated 3/24/06 and the associated documents that were provided.

We and the undersigned citizens of Alpine County strongly support the expressed aim of reducing SSO's to the lowest practicable level.

However, these proposed orders appear to be aimed at wastewater collection agencies much larger than our tiny volunteer-run system in Markleeville, Alpine County. See the attached MPUD Profile for a picture of just how small we are. It is clear that Districts like ours were not among the stakeholders consulted in formulating these Orders.

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. This is a more relevant measure of our size than the number of feet of sewer main we have. We have no way of generating the increased revenue needed to comply with the proposed waste discharge requirements other than an unreasonable rate increase. The stated cost for compliance in small communities of "\$40 per month per household" would more than double of our current rates. *This is simply unacceptable.* We also strongly object to imposition of an annual fee in the proposed amount of \$800 for a district of this size.

Our collection, treatment, and disposal systems all perform well and have for many years. 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 the Orders when both cannot be paid for at the same time.

Provision D-12 of this Order, requiring the preparation of an elaborate Sewer System Management Plan "by or under the direction of ... professionals," imposes an unsupportable burden, not just on this District's finances, but upon its volunteer Directors as well. Many other features of the plan would require our five unpaid volunteer Directors, who are already

overloaded with MPUD work, to participate in preparation, reporting, auditing, updating, and otherwise implementing these provisions.

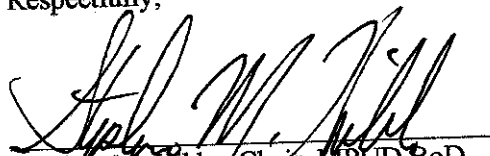
Our experience with existing regulatory requirements has shown that it is already difficult to keep up with reporting and perform auditing at regular intervals. Turnover of responsible individuals is high. Overworked volunteers do not work harder to meet increased demands; they quit, perpetuating an unavoidable cycle of unintended noncompliance. 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.

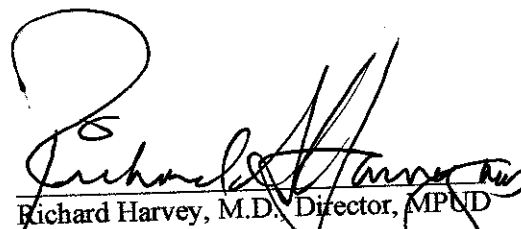
While it is usually feasible for us to submit reports electronically, this cannot be guaranteed. Ownership and maintenance of a computer will always be beyond our District's financial reach, and volunteers cannot be required to use theirs. The option for reporting on paper must remain open.

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 again 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. 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


Ted Doyal, Director, MPUD

Attachment:
MPUD Profile

Cc: MPUD File
MPUD Directors
Mr. Robert Tucker, Lahontan RWQCB
Mr. Alan Miller, P.E., Lahontan RWQCB
Kathy Mannion, RCRC Director of Water and Power (kathym@rcrcnet.org)
Mr. Don Jardine, Alpine County Supervisor, District 1
Mr. Henry "Skip" Veatch, Alpine Co. rep RCRC
Alpine County Board of Supervisors

Markleeville Public Utility District (MPUD)

4/06

Profile of a very small public wastewater utility

- The MPUD serves the unincorporated community of Markleeville, which has 200 inhabitants, seven small businesses, and Alpine County's administrative offices.
- We have 68 sewer service connections.
- We have 5800 feet of sewer mains, one pumping station, and 300 feet of force main.
- Wastewater treatment is in an open pond with discharge to a subsidiary pond, where final disposal is by evaporation.
- Permitted system capacity is 40,000 gallons of wastewater per day.
- Annual service fee billing 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 whose regular employment is elsewhere. 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, mostly landlocked by public land and large agricultural holdings. There is no expansion of service area on the horizon 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 paperless communication is not always possible. Secretary and Directors use their personal computers, which are not necessarily available for MPUD business, and work in their homes.

We are customers of the Markleeville Public Utility District and are concerned about these new rules for our district.

| | |
|----------------------|------------------------------|
| Jandra Matlock | residential |
| Jandra Matlock | commercial 2 hook-ups |
| Wanda Covan | Residence Laramie St. |
| W. Covan | Laramie Business |
| Gary Covan | Residence |
| G. E. Covan | Laramie Business |
| W. S. B. Covan | Main St. Business |
| Judith A. Farnsworth | 210 Laramie St MV |
| Judith A. Farnsworth | |
| Barbara Howard | Residential Hookup |
| AB | Residential hookup |
| AMMB | Residential hookup |
| Sandra Baena | Residential Hookup 1 |
| Sandra Baena | Residential Hookup 2 |
| John M. Hill | Residential Hookup |
| Kathryn Tully | RESIDENTIAL HOOKUP |
| John Jackson | RESIDENTIAL HOOK-UP |
| Ken Jackson | residential Hook-up |
| Joy S. Lynn | RESIDENTIAL Hook-up |
| D. M. M. J. | COUNTY SUPERVISOR DISTRICT 1 |
| Hub & Andrea Hanson | Residential Hook-up 2 |
| MARSHA BOND et al | 1 commercial Hookup |
| Veronica Swann | 1 commercial Hookup |

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| | | |
|-------------------|-----------------|----|
| Dwight Wallace | 110 Laramie St. | M |
| Karen M. Robinson | 180 Barrett Ln. | M. |
| Carol F. Robinson | 180 Barrett Ln | M |
| Beth Andrews | 53 Canon View | M |

We are customers of the Markleeville Public Utility District and are concerned about these new rules for our district.

Ron Andrews

1 Hookup

Geely Andros

5 Hookups?

Judy Howard

72 Barrett Ln (res)