



July 28, 2016

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, California 95814  
Comments Submitted Electronically

Re: Comment Letter – Proposed Drinking Water Fee Regulations

Dear Ms. Townsend and State Water Board Members,

The above listed organizations, most of which work directly in, or on behalf of, small and rural disadvantaged communities (DACs) throughout the state appreciate the opportunity to comment on the revised Drinking Water Fee Regulations. Our organizations have worked with the Drinking Water Program – at the Department of Public Health, and more recently at the State Water Board – for more than a decade as part of our efforts to address the critical drinking water challenges facing California communities.

We support the revised water fee structure, which will reduce fees for water systems serving disadvantaged communities, the systems most likely to struggle to pay the costs of maintaining a water system, including payment of fees to the Division of Drinking Water. The revised fee structure, adapted from the alternative proposal developed by the Association of California Water Agencies, will still allow the State Water Board to recover the same target amount of fees to better represent the costs of the drinking water program and thus allow the Board to more efficiently serve all water systems.

We believe the fee structure will be more equitably distributed according to a public water system's reasonable expectation of ability to pay, while providing some per connection discount to reflect economies of scale.

We appreciate the State Water Board's careful consideration of the comments made by the various stakeholders and for the time and effort to reduce burdens on customers of small, disadvantaged water systems.

Sincerely,

Laurel Firestone, Co-Executive Director, Community Water Center  
Jennifer Clary, Water Programs Manager, Clean Water Action  
Phoebe Seaton, Co-Director, Leadership Counsel for Justice & Accountability  
Kyle Jones, Policy Advocate, Sierra Club California  
Horacio Amezcuita, General Manager, San Jerardo Cooperative, Inc  
Sergio Carranza, Executive Director, Pueblo Unido Community Development Corporation  
Bill Allayaud, California Director of Government Affairs, Environmental Working Group  
Tom Collishaw, CEO & President, Self-Help Enterprises  
Stanley Keasling, Chief Executive Officer, Rural Community Assistance Corporation  
Gustavo Aguirre, Director of Organizing, Center on Race, Poverty, & the Environment  
Colin Bailey, Executive Director, Environmental Justice Coalition for Water  
Adam Scow, California Program Director, Food and Watch Watch