



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

MICHAEL RIDDELL – CHAIR, CITY OF CERES
JEFF WILLETT – SECRETARY, CITY OF STOCKTON

STEVE HOGG – VICE CHAIR, CITY OF FRESNO
ED CROUSE – TREASURER, RANCHO MURIETA CSD

September 14, 2011

Sent Via Electronic Mail

Charles Hoppin, Chair and Members
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100



Attn: Ms. Jeanine Townsend, Clerk to the Board
commentletters@waterboards.ca.gov

Re: 9/19-20/2011 BOARD MEETING - ITEM 9: Consideration of a proposed Resolution adopting emergency regulations revising the core regulatory fee schedules contained in Title 23, Division 3, Chapter 9, Article 1, Sections 2200 and 2200.6, and adding Section 2200.7 of the California Code of Regulations.

Dear Chair Hoppin and Board Members,

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit comments regarding the State Water Resources Control Board's (State Water Board) consideration of a proposed Resolution adopting emergency regulations revising the core regulatory fee schedules (Resolution). CVCWA is extremely concerned over the very large proposed increases being contemplated in the Resolution. We strongly urge the State Water Board to immediately explore and implement more cost effective approaches to water quality regulation, both in its implementation and administration.

CVCWA is a non-profit association whose member agencies own and operate municipal wastewater treatment facilities, sanitary sewer collection systems, and recycled water systems throughout the Central Valley. CVCWA's member agencies operate under NPDES permits, waste

discharge requirements (WDRs) and water recycling requirements (WRRs) and the Statewide Sanitary Sewer System WDR (SSS WDR).

As you may be aware, the Central Valley has been especially hard hit in this economy. Eight out of ten counties with the state's highest unemployment rates are in the Central Valley.¹ This economic downturn has forced many of our member agencies to make substantial costs cuts, limit rate increases, and reduce staffing. Budgets are stretched to their limits in order to provide necessary services for water quality protection. Many of our member agencies simply cannot afford the 34% to 61% fee increases contemplated in the staff recommendation or the 200+% increases if some other option is chosen. Rather than shifting the complete cost to local government agencies, we are asking the State and Regional Water Boards take the same hard look at its budget and limit the increases in fees.

CVCWA strongly urges the State Water Board to seriously evaluate and instigate measures to reduce the cost to implement its programs. For example, the State Water Board should explore the greater use of general permits, advocate for a change in the federal law to allow a 10-year NPDES permit cycle and implement other measures which would result in reduced administrative costs for to administer the NPDES and WDR programs.

Additionally, CVCWA recommends the State Water Board implement programmatic measures to reduce the cost of unnecessary regulations on the regulated community. This could be accomplished by measures such as updating and revising outdated or inappropriate provisions in basin plans; including upfront flexibility to comply with water quality objectives so that cost effective measures can be implemented, reducing monitoring and reporting requirements where there is little value in the effort, and conducting a robust analysis of the cost effectiveness of regulations before proposing or adopting them.

CVCWA and its members share with the State and Central Valley Water Boards the common purpose of protecting and improving water quality. Besides working together with you towards this common effort, we look forward to partnering with you to identify practical ways that administrative and implementation costs of the water quality programs can be reduced.

Sincerely,



Debbie Webster,
Executive Officer

¹ State of California Employee Development Department, Report 400C, Monthly Labor Force Data for Counties, July 2011 – Preliminary <http://www.calmis.ca.gov/file/lfmonth/countyur-400c.pdf>