

A Public Agency



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September 14, 2011

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 "I" Street, 24th Floor
Sacramento, CA 95814



Re: State Water Board Proposed WDR Fee Increase

Dear Board Members:

I would like to share my concerns regarding proposed fee increases specifically as it pertains to WDRs. The Amador Water Agency operates and maintains several small wastewater systems, several which have less than 20 connections. These are typically individual domestic septic tank systems with community leachfields and generally have low complexity and threat ratings. We also take advantage of the low flow fee discount, but even so with as few as 5 connections the annual fee becomes a significant component of a fee structure that is already in the \$100 per month range for most of our systems. The Water Agency, like many other wastewater entities, is facing rate protests and reduced revenue due to foreclosures and high unemployment. A 24% fee increase is an enormous burden for these small systems that have minimal oversight requirements and environmental threats. This brings to question whether these small systems are paying a disproportionate share of costs incurred by the State Water Board for regulating activities.

My request is that the State Water Board consider a third tier for very small systems with domestic and municipal flows less than 15,000 gallons per day and apply an additional 25% discount (or a total discount of 75%).

I would appreciate your consideration for this additional discount for very small systems. I can be reached at (209) 257-5245 if have any questions or would like to discuss this further.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Gene Mancebo'.

Gene Mancebo, PE
General Manager
Amador Water Agency

cc : Board