



Del Rey Community Services District 10649 E. Morro Drive
P.O. Box 186
Del Rey, CA 93616

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 Del Rey Community Services District submits these 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). We are writing today to express our concern over the very large proposed increases and to urge the State Water Board to delay the increase or significantly reduce it, and to look at exploring and implementing more cost effective approaches to regulation, both in its implementation and administration.

The Del Rey CSD is a very small district serving a population comprised of almost entirely individuals living below or at the poverty level and with very few remaining commercial or industrial dischargers. A fee increase would certainly put a significant burden on our already strained budget which has required us to significantly reduce staff and raise rates to our already overburdened residents. The District has been able in the past to secure a few grants to make upgrades and improvements to our system but they are disappearing now and are not available for operation and maintenance costs, staff, or permitting expenses.

Del Rey CSD is very concerned about the large fee increases

contemplated in the Resolution. Under the staff proposed fee structure, our facility permitting fees will increase by 23.8% for WDRs for our wastewater treatment facility. In this economy where we and most other public agencies and business are being forced to cut costs, limit rate increases, and reduce staffing, such large rate increases are devastating and unheard of.

We strongly urge the State Water Board to seriously evaluate and consider measures to reduce the cost to implement its programs and programmatic measures to reduce the cost of unnecessary regulations to the regulated community. For example, the State Water Board should explore ideas that would result in reduced administrative costs for these programs. Additionally, a major change is needed in the State's approach to regulations to make regulations more cost effective. We recommend the State and Regional Water Board take action to reduce the costs of unnecessary regulations on the regulated community such as update and revise basin plans to reduce the cost of compliance as well as the resources that have to be spent to challenge and defend permits based on those outdated plans.

In summary, Del Rey CSD opposes the fee increases and recommends the State Water Board direct its dedicated Staff to re-evaluate the cost effectiveness of its programs and its regulations in achieving the worthy goals of improving water quality.

Del Rey CSD District Manager
Hilda Ortiz