commentletters

Subject: Attachments: Revised Drinking Water Fee Regulations Comments Regarding Public Water System Fees SA.DOCX



From: Fahrudin Zulcic [mailto:fzulcic@ph.lacounty.gov]
Sent: Friday, July 22, 2016 2:22 PM
To: Davis, Justin@Waterboards; Wilson, Ryan@Waterboards
Cc: DPH-ehadmin; Nicolas Martinez; Scott Abbott; Patricia Jocas
Subject: Revised Drinking Water Fee Regulations

Good afternoon,

Attached are LA County PH/EH comments regarding the proposed drinking water fees.

If you have any questions, please let us know.

Thank you,

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COMMENTS REGARDING CALIFORNIA CODE OF REGULATIONS, TITLE 22 - PROPOSED CHANGES IN PUBLIC DRINKING WATER FEES

July 19, 2016

The County of Los Angeles, Department of Public Health (DPH) serves as the Local Primacy Agency (LPA) for small water systems in the County of Los Angeles. In 2015, DPH restructured its LPA program to ensure that it met all of the obligations under the LPA agreement. As authorized by the California Health and Safety Code, Section 116565(f) DPH has adopted a set of fees to cover the cost of services provided that in some cases exceed the fees prescribed by Title 22.

In addition, DPH is required to recover the full cost of services provided since the program does not receive fees from the County general fund. As a result, DPH is unable to provide reduced fees for public water systems that serve disadvantaged communities.

DPH believes that providing relief to disadvantaged communities through lower fees is a worthy goal. However, providing a lower permit fee to the public water system does not ensure that this savings is passed on to the customers. The State should consider adding a requirement that the public water system must be a non-profit company in order to receive the discounted rate for serving a disadvantaged community.