









Sent via ELECTRONIC MAIL to DAS-DrinkingWaterFees@waterboards.ca.gov

June 22, 2016

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

Re: Comments regarding the SWRCB Draft Drinking Water Fee Regulations

Dear Ms. Townsend:

The Association of California Water Agencies, the California Municipal Utilities Association, the California State Association of Counties and the California-Nevada Section of the American Water Works Association appreciate the opportunity to comment on the State Water Resources Control Board's ("SWRCB") draft Drinking Water Fee Regulations released for public comment on April 29, 2016 ("Draft Fee Regulations"). As representatives of the entities that provide safe drinking water to the vast majority of Californians, we recognize that the final Fee Regulations must ensure that the Drinking Water Program has adequate funding for fiscal year 2016-17. We are concerned, however, that the Draft Fee Regulations do not equitably allocate Drinking Water Program costs among fee payors.

Our organizations encourage the SWRCB to replace the fee schedule proposed in section 64305 of the Draft Fee Regulations with the Water Community Option detailed in the Association of California Water Agencies' comment letter. We also encourage the SWRCB

to carefully consider the comments provided in individual comment letters submitted by our organizations for additional suggested changes that can help ensure that the state's Drinking Water Program maintains its accountability to public water systems and the customers they serve.

We appreciate the substantial efforts of State Board staff to engage public water system representatives on this important issue. Our organizations are committed to working with the State Board and other stakeholders to address drinking water quality and reliability issues, and we look forward to working with State Board staff as they continue to refine the Draft Fee Regulations.

Sincerely,

Timothy H. Quinn, Executive Director

Association of California Water Agencies

Danielle Blacet, Director for Water

California Municipal Utilities Association

Karen Keene, Senior Legislative Representative/Director of Federal Affairs

California Municipal Utilities Association

Timothy Worley, PhD, Executive Director

California-Nevada Section, American Water Works Association

cc: The Honorable Felicia Marcus, Chair

The Honorable Dorene D'Adamo, Member

The Honorable Tam M. Doduc, Member

The Honorable Frances Spivy-Weber, Member

The Honorable Steven Moore, Member

Mr. Tom Howard, Executive Director

Ms. Cindy Forbes, Deputy Director, Division of Drinking Water

Mr. John Russell, Deputy Director, Division of Administrative Services