

SYNAGRO

September 13, 2011

Via Electronic Mail

Charles Hoppin, Chair, and Members  
c/o Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



**SUBJECT: Comment Letter – NPDES Fee Structure: CONSIDERATION OF A 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 Chairman Hoppin and Members:

On behalf of Synagro, we appreciate the opportunity to provide comments regarding the fee structure options being considered for assessment of regulatory fees in fiscal year 2011-12.

Synagro is a recycler of organic by-products that provides essential environmental recycling solutions to California water and wastewater treatment facilities in the municipal sector. Under any scenario selected by the Board, the proposed fee structure will greatly impact our ability to continue to provide our customers with reliable environmentally sound recycling solutions.

Over the past two years, we understand that the State Water Resources Control Board (Board), its staff and stakeholders have spent significant time and effort in trying to identify more equitable and sustainable fee methodologies. While we applaud the Board's commitment to protecting the waters of the State, the sheer magnitude of the proposed revenue increase is not consistent with sustainable recycling solutions for companies and municipalities across the State.

We are very concerned that, no matter what structure the Board adopts fees for permit holders overall will be increasing significantly. Much of this increase is due to shifts of costs from other programs and does not equate to any enhancement or improvement in the level of effort or service provided by the State and regional boards. In an era where every business and public agency is being forced to cut costs, limit rate increases and reduce staffing, WDR fees are increasing. These increases are not sustainable.

In summary, Synagro appreciates the Board's willingness to engage in a discussion regarding ways to realign the fee structure to improve sustainability, however, any increases to fees associated with proper and sound recycling solutions will be overwhelming to private businesses who serve the municipal sector.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Loder".

Lorrie Loder  
Regional Technical Services Director