



## California Stormwater Quality Association®

*Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation*

August 26, 2011

Mr. Tom Howard, Executive Director  
State Water Resources Control Board



Subject: NPDES Permit Fees Options: Stormwater adjustment

Dear Mr. Howard:

On behalf of the NPDES stormwater permittee members of the California Stormwater Quality Association (CASQA), I want to thank you for creating a new fee calculation option for the Board's consideration. The new option would create a stormwater adjustment factor that recognizes the inadvertent over-collection of fees from stormwater permittees over the last nine fiscal years dating back to FY 02-03 and creates a credit adjustment. We understand from the August 15 Water Quality Fee Stakeholder meeting that the stormwater adjustment option is one of two options staff will present to the Board to consider for adoption on September 20.

Setting aside the exact amount of the adjustment and any adjusted percent fee increase, CASQA and its members strongly support the State Water Board's use of a fee calculation that includes a stormwater adjustment and therefore request that staff make the option with a stormwater adjustment the staff recommendation. As we have discussed and as we believe the other Waste Discharge Permit Fund programs acknowledge, the over-collection of fees from stormwater permittees has to be addressed. A fee calculation option that includes a stormwater adjustment provides a way to accomplish this, is the most fair and equitable approach, and therefore is the most appropriate option.

Please contact me at (760) 603-6242 or Geoff Brosseau, our Executive Director at (650) 365-8620 if you have any questions or would like to discuss our comments further.

Sincerely,

A handwritten signature in black ink that reads "Scott Taylor". The signature is fluid and cursive, with a prominent "S" and "T".

Scott Taylor, P.E. D. WRE  
Chair, California Stormwater Quality Association

cc: Caren Trgovcich, Chief Deputy Director, State Water Board  
Darrin Polhemus, Deputy Director, State Water Board  
Miles Burnett, Assistant Deputy Director, State Water Board  
David Ceccarelli, Fee Unit Manager, State Water Board  
Bruce Fujimoto, Stormwater Section Manager, State Water Board  
CASQA Executive Program Committee and CASQA Board of Directors