To whom it may concern:

Shasta county has reviewed the proposed fees and offers the following comments:

- Groundwater Sustainability Plans are not due until 2022. These plans require identification of projects, such as use of stormwater for recharge, to maintain sustainable groundwater. Stormwater fees should be re-visited in 2022 when all groundwater basins will know whether or not the fees will apply to them, and give more appropriate feedback.

- The temporary fees are too dependent on precipitation conditions to allow the State Board to charge “based on the total annual amount of diversion sought by the application.” Given the current state of long term weather forecasting, the existing fee structure which allows payment based on actual diversions is much more appropriate for the nature of the permits and basis of water use fees in California.

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