

**DUBLIN
SAN RAMON
SERVICES
DISTRICT**



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September 15, 2011

California State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



RE: Emergency regulations revising regulatory fee schedules, including NPDES annual fees

Dear SWRCB:

The SWRCB is scheduled to consider adopting a resolution that would impose emergency regulations revising core regulatory fees schedules by over 45%, including annual fees that apply to NPDES permits. The Dublin San Ramon Services District (DSRSD) wishes to submit the following comments:

The proposed fee schedule increases were only recently finalized, but will apparently take effect for invoices prepared by the SWRCB this fall. DSRSD, like most other special districts in California, adopted a budget for FY 2012 last June. During the preparation of our annual budget we were aware that the SWRCB was working on a possible increase to NPDES fees, and based on the information available at the time, we anticipated an increase of about 20% to our permit fees. Based on these estimates, a 20% increase in NPDES permit fees was included when our FY 2012 budget was prepared and later adopted by our Board of Directors. However, because this proposed increase was not finalized until well into the fiscal year when it will take effect, DSRSD could not anticipate this large of an increase, and the amount of the proposed increase in fees will significantly exceed our budget. Therefore, we object to the amount of the proposed increase in fees, and particularly the proposed timing for implementation. For this reason, we recommend that the proposed increase in permit fees be phased in over at least 2 fiscal years, with the increase during FY 2012 to be no more than 20% higher than the fees assessed during FY 2011.

DSRSD is a member of the California Association of Sanitation Agencies (CASA), and representatives of CASA participated in a stakeholder group that attempted to develop an alternative approach to assessing NPDES permit fees. Unfortunately this group was unable to reach an agreement with SWRCB staff.

Sincerely,

DANIEL P. GALLAGHER
Operations Manager

cc: Bert Michalczyk, General Manager, DSRSD
Levi Fuller, Operations Supervisor, DSRSD

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