



John S. "Steve" Wilson
DIVISION MANAGER
jwilson@turlock.ca.us

MUNICIPAL SERVICES
WATER QUALITY CONTROL DIVISION

156 S. BROADWAY, SUITE 270 | TURLOCK, CALIFORNIA 95380 | PHONE 209-668-5599 EXT 4443 | FAX 209-668-5569

September 13, 2011

Sent Via Electronic Mail

Charles Hoppin, Chair and Members
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100



Attn: Ms. Jeanine Townsend
Clerk to the Board
commentletters@waterboards.ca.gov

Re: 9/19-20/2011 BOARD MEETING - ITEM 9
Consideration of a proposed 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 Chair Hoppin and Board Members:

The City of Turlock submits these comments regarding the State Water Resources Control Board's (State Water Board) consideration of a proposed Resolution adopting emergency regulations revising the core regulatory fee schedules (Resolution). I am writing today to express the City of Turlock's concern over the very large proposed increases and to urge the State Water Board to oppose the proposed fee increases. The City recommends that instead of balancing stormwater program fees on the backs of other programs we urge the Board to explore and implement other more cost effective approaches to regulation, both in its implementation and administration.

The City of Turlock owns and operates a Regional, 20 MGD tertiary treatment facility, approximately 250 miles of collection system and maintains a Phase II stormwater, Small MS 4 collection and disposal system. Due to the economic downturn, budgets have been reduced and staffing has been kept at a minimum to ensure that our ratepayers have an affordable service fee. The proposed rates would have a detrimental effect on the City's service rates and our ratepayers. In this economy where we are being forced to cut costs, limit rate increases, and reduce staffing, such large rate increases are reprehensible and not sustainable.

The City of Turlock strongly urges the State Water Board to seriously evaluate and consider other measures to reduce the cost to implement its programs and programmatic measures to reduce the cost of unnecessary regulations to the regulated community. For example, the State Water Board should explore reducing administrative regulatory costs, such as greater use of general permits, and

advocating a change in the federal law to allow a 10-year NPDES permit cycle which would result in reduced administrative costs for these programs.

Additionally, a major change is needed in the State's approach to regulations to make regulations more cost effective. We recommend the State and Regional Water Board take action to reduce the costs of unnecessary regulations on the regulated community such as update and revise basin plans to reduce the cost of compliance as well as the resources that have to be spent to challenge and defend permits based on those outdated plans.

In summary, the City of Turlock opposes the fee increases and recommends the State Water Board direct its Staff to re-evaluate the cost effectiveness of its programs and its regulations in achieving the worthy goals of improving water quality.

Please feel free to contact me at 209 668-5599 Ext. 4443 or jwilson@turlock.ca.us if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "John S. Wilson". The signature is fluid and cursive, with a large initial "J" and "W".

John S. "Steve" Wilson
Water Quality Control Division Manager
City of Turlock