



June 29, 2011



Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Email: commentletters@waterboards.ca.gov

RE: Comment Letter – NPDES Fee Structure

On behalf of the Riverside County Waste Management Department (Department), we thank you for the opportunity to provide comments on the proposed changes to the NPDES fee structure.

The Department has reviewed the proposed scenarios and has determined the new proposed fee structure would increase the Department's cost to continue being covered under the NPDES permit 60% to 120%. The Department is fully cognizant of the State Water Resources Control Board's (Board) budget problems, as we are struggling with budget issues as well. However, our response has been to cut costs (including painful layoffs), as we do not have the luxury of imposing such large rate increases.

The Department is already struggling with finding cost effective ways to comply with the onerous and unfunded mandates within the proposed changes to the Draft Industrial Storm Water General Permit. During these difficult economic times, with ever tightening regulations, we would request that the State follow the lead of local jurisdictions and do more with less, not raise yet another fee on top of the Board's increased land disposal fees.

Sincerely,

Joseph R. McCann
Assistant Chief Engineer

JRM: pw

cc: Alex Gann, Executive Office

PD#104323 (word document)

PD#104365 (digital signed letter)