

COUNTY OF SANTA BARBARA
PUBLIC WORKS DEPARTMENT
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SCOTT D. MCGOLPIN
Director



Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

RE: Comments on the Proposed Resolution Adopting Emergency Regulations Revising the Core Regulatory Fee Schedules Contained in Title 23, Division 3, Chapter 9, Article 1, Sections 2200, 2200.5, And 2200.6 Of The California Code Of Regulations

Dear Chair Marcus:

Santa Barbara County would like to offer comments on the proposed Resolution Adopting Emergency Regulations Revising the Core Regulatory Fee Schedules Contained in Title 23, Division 3, Chapter 9, Article 1, Sections 2200, 2200.5, And 2200.6 of the California Code of Regulations.

It has just come to our attention that this matter is being heard on an emergency basis at the September State Water Board meeting. We would implore you to postpone this to allow for the affected agencies to be informed of this matter and to provide comment. It is our understanding that the California Stormwater Quality Association (CASQA) has asked the Board to postpone adoption of the resolution until October, and to direct staff to work with their organization on a rebalance plan as part of the FY 13-14 fee structure. The County is in full support of CASQA's proposal, and encourages you to strongly consider it.

It is our understanding that Water Board staff is proposing to increase fees by 20.5% overall and that the fees would be for the current 2013-14 fiscal year. Like most jurisdictions across the State, we have already adopted this year's budget and do not have the funds available for an additional permit fee. We are particularly concerned about the 30.9% fee increase for the stormwater program. As pointed out by CASQA, stormwater permit fees have been disproportionate to the expenditures for the program for many years, which has led to those dischargers essentially subsidizing the rest of the programs under the Waste Discharge Permit Fund (WDPF). We request that the Water Board take a serious look at these inequities and work toward relieving the undue burden on stormwater dischargers.

Thank you for the opportunity to comment. Again, we encourage you to postpone this matter until your October meeting and to direct your staff to work with CASQA on a more equitable fee structure. Please feel free to contact me with any questions regarding our comments.

Sincerely,

Scott D. McGolpin
Director, Santa Barbara County Public Works

AA /EEO Employer

Thomas D. Fayram, Deputy Director
Mark Paul, Deputy Director

Chris Sneddon, Deputy Director
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