



California Stormwater Quality Association®

Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation

September 10, 2015

Ms. Felicia Marcus, Chair
State Water Resources Control Board

Subject: Proposed Stormwater Permit Fees



Dear Ms. Marcus and Members of the Board:

On behalf of the NPDES stormwater permittee members of the California Stormwater Quality Association (CASQA), we are writing you to convey our support for the proposed 2015-16 fee schedules for stormwater permittees. It is our understanding that the 2015-16 fees will not be increased over the total fees adopted September 24, 2013 and that a one-time discount of 28.4% is proposed to be applied at the time of invoicing to the 2015-16 fees for all stormwater permittees.

As you know, State Water Board Waste Discharge Permit Fund records show the stormwater program is the only program with a positive balance over the ten fiscal years from 2004-05 through 2013-14 – by a wide margin while the rest of the programs were in the red during that same time period. We understand the positive and negative program balances are only on paper because each year any positive balance was essentially used to cover the costs of other programs that had negative balances. State Water Board records also show that for the time period of 2002-03 through 2013-14 this unintended but real over-collection of stormwater permit fees resulted in a cumulative over-collection of stormwater permit fees of about \$28.227 million as of June 30, 2014¹. The stormwater permittees appreciate the State Water Board's recognition of the situation and strongly support the discount and the proposed no increase in total stormwater permit fees for 2015-16.

Sincerely,

A handwritten signature in black ink, appearing to read "Geoff Brosseau", written over a white background.

Geoff Brosseau
Executive Director, California Stormwater Quality Association

cc: CASQA Board of Directors and Executive Program Committee

¹ This year's proposed one-time discount of 28.4% could be viewed as equivalent to an estimated \$4.408 million decrease in the cumulative stormwater fee overage and combined with last year's 8.9% discount (\$3.051 million), effectively reduce that overage to about \$20.768 million.