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September 30, 2008

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Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
1001 I St., 24th Floor
Sacramento, CA 95814

Re: 10/7/08 BOARD MEETING – Item No. 4 – Core Water Quality Regulatory Fee Schedules

Dear Ms. Townsend:

Thank you for the opportunity to comment on the proposed increases to the core water quality regulatory fees schedules. These comments are submitted on behalf of the Community Alliance for Responsible Environmental Stewardship (CARES), a statewide group representing the dairy industry.

CARES understands the need to increase the fee schedules. We respectfully request the following addition to the schedules:

Section 2200(c)(5):

Facilities that operate under General Waste Discharge Requirements will receive a ten percent fee reduction.

As you know, the Porter-Cologne Water Quality Control Act authorizes the State and Regional Water Boards to issue General Waste Discharge Requirements (WDRs). (California Water Code § 13263(i).) Issuance of General WDRs serves many beneficial purposes, including cost savings. Participation by dischargers in General WDR coverage should be encouraged. Reductions in what otherwise would be charged serve as an encouragement. In this regard, the NPDES portions of the fee schedule do provide for smaller increases in fees to persons covered by general NPDES permits. For example, the proposed fee increase for general NPDES permit holders is 20%, as compared to the 36% increase for other NPDES categories. Fees for stormwater dischargers, covered by general permits, will be increased by 20%.



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There are no corresponding fee increase considerations for WDR dischargers covered by General WDRs. The proposal mentioned above would provide encouragement to dischargers to seek coverage under available general permits. Understanding that any changes to the proposed fee schedules should be revenue neutral, the 40% proposed fee increase from WDR-Discharge to Land could be adjusted slightly upward.

Thank you on behalf of CARES for considering these comments.

Very truly yours,

Craig M. Wilson

CMW:ms

cc: Tedd Cobb, OCC
Bob Rinker, Staff