



# CALIFORNIA ASSOCIATION of SANITATION AGENCIES

1225 8<sup>th</sup> Street, Suite 595 • Sacramento, CA 95814 • TEL: (916) 446-0388 • [www.casaweb.org](http://www.casaweb.org)

September 9, 2015

*Sent via Electronic Mail to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)*



Felicia Marcus, Chair, and Members State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814  
c/o Ms. Jeanine Townsend, Clerk to the Board

**Subject: CASA Comment Letter – FY 2015-16 Water Quality Fees**

Dear Chair Marcus and Board Members,

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to provide comment on the proposed Water Quality Fees for Fiscal Year 2015-16 (hereafter “fees”). CASA is a statewide association representing municipalities, special districts, and joint powers agencies that provide wastewater collection, treatment, clean energy and water recycling services to millions of Californians. CASA’s members are governed by Waste Discharge Requirements (WDRs) or are required to obtain National Pollutant Discharge Elimination System (NPDES) permits, and thus are directly impacted by the proposed fees.

CASA appreciates the efforts of State Water Board staff in making the development and explanation of this year’s fees more transparent and providing a greater level of detail and stakeholder engagement earlier in the process. We also appreciate that staff is proposing to maintain the fees at the FY 2014-15 levels for this fiscal year in most program areas, and that as a result of revenue exceeding expenditures in certain programs, staff is proposing a one time fee reduction in specified areas.

CASA also understands that tying revenues generated to expenditures by program area in a more precise manner may be beneficial in the long term, and we look forward to working with staff to explore the potential to assess fees based more closely on the actual staff work projected to be performed. Finally, CASA encourages the State Water Board to continue working with stakeholders, staff, and the Regional Boards to find ways to reduce the costs of compliance while maintaining water quality protections. Ongoing discussions and actions related to the resource alignment initiative are important, as are other common sense ways to reduce costs in the face of future potential fee increases.

Sincerely,

Adam D. Link  
CASA Director of Government Affairs