



WQCD Clean Water Fee Structure Feedback Summary Water Quality Certification

This document is an overview of feedback received for the water quality certification workgroup. A similar summary will be published for each workgroup. Comments and levels of agreement for large group policy considerations including statute vs. commission, general fund and the overall process will be shared in a separate full group summary.

RESPONDENT SUMMARY

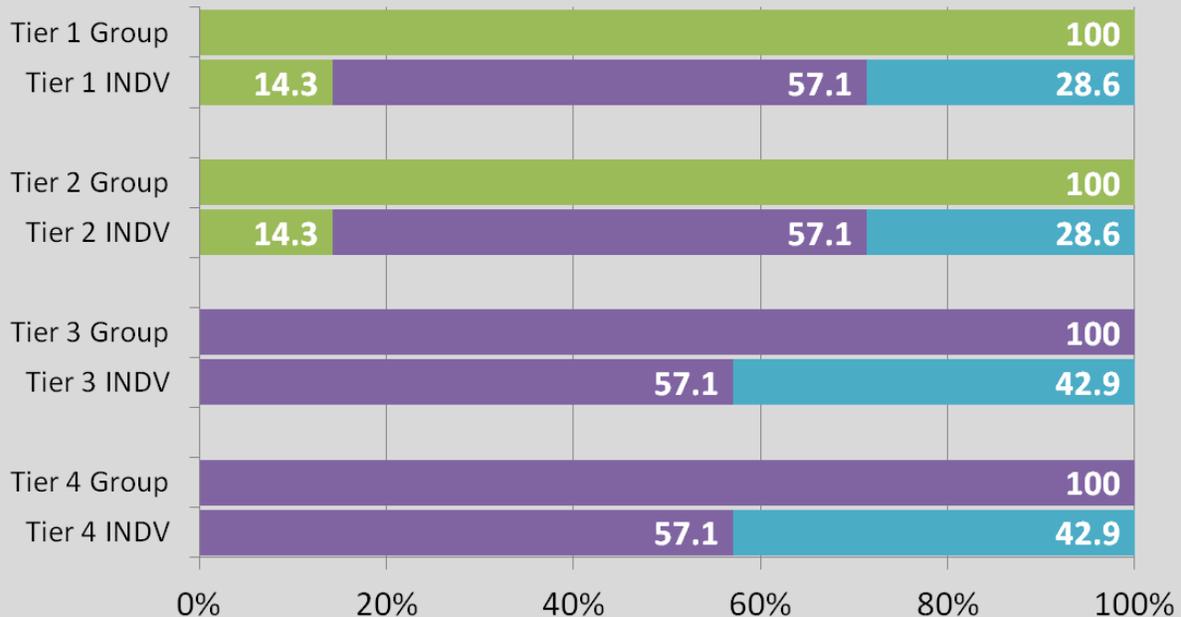
Total number of respondents: **9**

Respondents who attended meetings: **70%**

The water quality certification group discussed a proposed tiered fee schedule based on number of work hours, complexity and length of project. Below is a summary on the average level of agreement (or not) with each of the proposed tiers as well as the themes related to the fee proposal.

| Tier | Pre-application | Certification | Certification conditions monitoring | Possible range of fees based on number of hours and life of project |
|------|--------------------------------------|--|-------------------------------------|---|
| 1 | no fee | \$1,100 submitted with certification application | no fee | \$1,100 |
| 2 | no fee | \$3,800 submitted with certification application | no fee | \$3,800 |
| 3 | \$600 submitted with pre-application | \$76/hour for division staff \$152/hour for contractors | \$76/hour for division staff | \$41,600 to \$69,000 |
| 4 | \$600 submitted with pre-application | \$90/hour for division staff \$180/hour for contractors | \$90/hour for division staff | \$276,000 to \$735,000 |

Level of agreement (%) on fee concepts by groups and individuals



■ Strongly Disagree ■ Somewhat Disagree ■ Neutral
■ Somewhat Agree ■ Strongly Agree



- Nearly 60% marked their support for all tiered fee proposals.
- Respondents were either neutral or agreed with the proposed tiers.



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Additional themes regarding the tiered fee proposal

Respondents also had the opportunity to provide clarification and/or additional thoughts regarding the proposed fee proposal. Below is a summary of themes received.

- Agreement that the tier concept is appropriate based on project size and complexity.
- The potential costs for tiers three and four are high. The division should consider a cap for these tiers or make sure that a scope of work is developed at the onset of each project to maintain accountability and control costs.
- Early involvement by the division in the NEPA and 404 permitting process is critical.

Workgroup Recommendations

Each workgroup created a set of recommendations. Below is a summary on the average level of agreement (or not) with each of the recommendations as well as the themes of other recommendations provided through the feedback form.

| Recommendation | Outcome |
|--|-----------------------------------|
| 1. The division needs to define when the certification step begins more clearly for stakeholders. | Over 75% agreement. |
| 2. The timeframe and requirement for pre-application should be better defined, specifically: A. Distinction between formal application and pre-application. B. Clarity on when division staff and/or a contractor would be used. Pre-application meeting would include discussions around scope of work and division/consultant involvement and participation. | Over 75% agreement. |
| 3. Fees ranges should have maximum caps. | 75% were neutral or in agreement. |
| 4. The division should be accountable for time/effort spent and track their effort clearly. | 100% agreement. |
| 5. For Tier 3 and Tier 4 fees there should be a reviewable price estimate at the start of each project | 86% agreement. |
| 6. The program should continue to exist and the current level of one FTE is appropriate. | 76% agreement. |



Additional themes regarding workgroup recommendations

Respondents also had the opportunity to provide clarification and/or additional thoughts regarding workgroup recommendations. Below is a summary of themes received.

- A cost estimate/budget needs to be developed at the outset of the process for tier three and four efforts.
- Contractors could be utilized for tier three and four efforts rather than hiring permanent employees.
- It is essential that the division be involved early on in NEPA efforts.