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September 8, 2011



Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000

Re: Comment Letter—Phase II Small MS4 General Permit

Dear Ms. Townsend:

The City of Napa ("Napa") submits these comments on the Draft General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) ("Draft Permit") that has been issued by the State Water Resources Control Board ("State Board") for public review and comment. Napa appreciates the opportunity to submit these comments, and hopes they assist the State Board in significantly revising the Draft Permit to make it a cost-effective program providing measurable water quality benefits.

Napa's comments present the City's unique concerns about the Draft Permit. Napa participates in the Napa County Stormwater Pollution Prevention Program ("NCSPPP" or "Program"), is a member of the California Stormwater Quality Association ("CASQA") and has joined the Statewide Stormwater Coalition ("SSC"). Napa generally concurs with the substantive comments contained in the comment letters submitted by NCSPPP, CASQA and SSC. The City writes separately to address issues unique to Napa.

THE CITY OF NAPA

The City is located along the Napa River in the County of Napa. Napa is 17.7 square miles in size and currently has approximately 77,000 residents. The population of the City is approximately 56% of all the people who live in Napa County, and the City is generally recognized as the center of commerce and government in the County.

As with all cities in California, the prolonged recession has left the City facing fiscal challenges. To achieve a balanced budget during the recession, the City has cut staff, frozen or cut wages, increased the employee's share of benefit costs and strategically cut services and programs. Unfortunately, these difficult budgetary constraints are likely to continue as the City struggles to implement its mandated activities while facing increased funding challenges. These challenges do not mean that the City will stop providing essential services to its residents, including operating a

storm water management system that provides measurable water quality benefits. It does mean, however, that the City must spend its limited funds wisely on a wide range of essential programs, of which the storm water program is one of many. A fundamental point of Napa's comment letter is that the Draft Permit fails to follow the same prudent approach to the effective use of very limited resources that cities must take, and fails to acknowledge that the State Board must play a more active role in funding those programs that are not essential to meeting the federal requirements, as expressed in U.S. EPA's Phase II Regulations.

Even during this very difficult budgetary period, however, Napa has pushed forward, in partnership with the Napa County Flood Control and Water Conservation District and the U.S. Army Corps of Engineers, with a major flood protection and water quality enhancement project for the Napa River and Napa Creek. The award-winning Napa River/Napa Creek Flood Protection Project, with costs to date in excess of \$600,000,000 and that involves the riparian wetland restoration of over six miles of the Napa River, from Highway 29 on the south to Trancas Street on the north, as well as about one mile of Napa Creek, is at the vanguard of environmentally responsible flood and watershed protection initiatives and represents our community's extraordinary commitment to the enhancement of water quality of the Napa River and its tributaries. Through the use of riverbank terracing, reconnection of the River to its historic floodplain and removing or replacing bridges that impede flood flows, flood water levels will be reduced and water quality will be improved. This project is a major undertaking of the City, and, as described in more detail below, one of the City's significant concerns with the Draft Permit is its unnecessary flood control enhancement provisions, which are redundant and have no proper application to the City in light of this major flood control project.

NAPA'S STORM WATER PROGRAM

Napa is currently enrolled under the State Board's Order No. 2003-0005-DWQ ("Existing Permit"). Napa's Storm Water Management Plan ("SWMP") was developed in compliance with the Existing Permit and in conjunction with the Cities of St. Helena, American Canyon, Calistoga, the Town of Yountville and the County of Napa, who applied to the San Francisco Bay Regional Water Quality Control Board ("Regional Board") for coverage under the Existing Permit on March 10, 2003. Our Program goals are to prevent stormwater pollution, protect and enhance water quality in the Napa River, local creeks and wetlands, preserve beneficial uses of local waterways, and comply with State and Federal regulations. Napa currently expends approximately \$400,000 per year to ensure compliance with the existing Phase II Regulations. A portion of these costs support one full-time Engineering Assistant position which is dedicated to implementing the SWMP. The costs also cover the City's proportionate share of the county-wide Program and NPDES permit fees. It should be noted that each of Napa's SWMP Annual Report since 2003 has shown conformance with existing Phase II regulations.

Our General Fund pays 100% of these costs because state law prohibits passing these costs on to property owners. Napa is actively implementing its SWMP in a progressive manner and is committed to doing so in the future. We believe our existing SWMP and county-wide Program properly balances storm water management and the achievement of measurable goals within overall budget constraints. The Draft Permit fails to strike such a balance, and imposes redundant, costly requirements that are not linked to measurable outcomes. A better approach would be to

allow Napa to continue to implement its current program under its approved SWMP so that the we can maintain the balance between resources spent and effective storm water management outcomes.

SPECIFIC COMMENTS ON THE DRAFT PERMIT

With these overarching comments as a backdrop, Napa has the following more specific comments about the Draft Permit.

1. UNFUNDED STATE MANDATES:

Articles XIII B, Section 6(a) of the California Constitution (“Section 6”) provides that whenever “any state agency mandates a new program or higher level of service on any local government, the state shall provide a subvention of funds to reimburse that local government for the costs of the program or increased level of services” Section 6 applies to storm water permits issued by the State Board and the Regional Boards. (County of Los Angeles v. Commission on State Mandates (2007) 150 Cal.App.4th 898, 920.) Other comment letters, including the letters submitted by the SSC and the City of Roseville, provide more detail on the background and issues related to unfunded state mandates, and Napa joins in those more detailed comments.

Based upon Napa’s analysis, the following elements of the Draft Permit, among others, represent state mandated new programs or higher levels of service which exceed U.S. EPA’s six minimum measures and for which a subvention of funds must be provided: Draft Permit, Sections B.3, E.4.c, E.4.d, components of E.5, components of E.6, components of E.7, components of E.8, components of E.9, components of E.12, E.10, E.11, E.13, E.14, and E.16. The State Board should reevaluate each of these elements of the Draft Permit and should delete or substantially revise those provisions for which the State Board is not able to provide adequate funding to implement.

To the extent that the State Board believes that these new programs or higher levels of service should be imposed under state law, the State Board should identify specific state funding sources in the Permit that are sufficient to pay for them. The Permit’s seeming reliance upon local funding sources to do so is misplaced in light of the Commission on State Mandate’s March 26, 2010 Statement of Decision in Test Case No.: 07-TC-09, which found that that numerous similar program elements in another NPDES permit are a reimbursable state-mandated new program or higher level of service under California Constitution. The State Board should also provide, in the Draft Permit, that these state mandated new programs or higher levels of service need not be implemented unless state funding is provided for them on an annual basis.

While Napa has not been able to conduct an exhaustive analysis of the increased costs associated with these new programs or higher levels of services, Napa has developed initial estimates for such costs. The City estimates that compliance with these new programs or higher levels of service will initially cost an **additional \$3,832,229** for the first year of implementation, for a **total cost of \$4,232,229**. The City estimates that compliance with these new programs or higher levels of service each year thereafter to cost an average **additional \$1,926,529 per year**, for an average annual **total cost of \$2,326,529**. The City anticipates an initial annual cost of these

additional or higher levels of service to be nearly \$100 per household and thereafter estimates average annual costs of \$90 per household.

COSTS DO MATTER to Napa. These state mandated requirements for new programs and/or higher levels of service will cost more than 10X our current expenditure levels. For a community such as Napa that is beset with historic budgetary and fiscal constraints, the costs of these new programs and/or higher levels of services are unaffordable, and it is irresponsible for the State Board to impose them upon us without linking them to a state funding source.

2. APPLICATION OF THE DRAFT PERMIT TO RENEWAL TRADITIONAL MS4S

The Draft Permit contains a repeated footnote stating that if “a Regional Water Board Executive Officer determines that a Renewal Traditional Small MS4 Permittee’s current implementation of its program BMPs meets the MEP standard and is equally or more effective at reducing pollutant discharges than implementation of the requirements of this Section, the Executive Officer may require continued implementation of the Permittee’s current program BMPs and reporting requirements in lieu of implementation of the requirements of this Section.” (See, e.g., Draft Permit, Section E.4, fn. 9.)

While it makes good sense to accommodate the current programs of Renewal Traditional Small MS4 Permittees within the structure of the Draft Permit, the authority delegated to the Regional Boards is too great and creates too much confusion about the applicability of enforceable provisions of the Draft Permit. A better approach would be to find that the current programs of Renewal Traditional Small MS4s that have been enrolled under the Existing Permit satisfy the requirements of the Draft Permit and meet the MEP standard, as defined by U.S. EPA in the Phase II Regulations. (See, e.g., 64 Fed.Reg 68722, 68753 (noting that the proper implementation of the six minimum measures results in the reduction of pollutants to the MEP).)

If a role for the Regional Board is necessary, the State Board should redraft this footnote to create a presumption that current programs satisfy the requirements of the Draft Permit and MEP, and require the Regional Board to make findings to the contrary. If this course is pursued, the Draft Permit should also provide a vehicle by which Renewal Traditional Small MS4s who believe that their current programs exceed the requirements of the Draft Permit may elect to implement the requirements of the Draft Permit rather than their current programs.

3. APPLICATION OF THE DRAFT PERMIT TO NON-TRADITIONAL MS4S

The Draft Permit exempts K-12 schools from its reach and also establishes lower program requirements for other Non-Traditional MS4s. This approach will leave “doughnut holes” in permit coverage. Often, cities do not have the legal authority to directly regulate these Non-Traditional MS4s, and yet cities might be held accountable for the discharges these entities make. Since the State Board has the direct authority to regulate these Non-Traditional MS4s, the State Board may wish to reconsider its approach to these entities. Rather than imposing costly new programs and higher levels of service on Renewal Traditional Small MS4 Permittees, the State Board should apply fair and consistent rules to all dischargers.

This issue is of particular relevance to the City. Within the City's boundaries are a State Fair grounds, a State hospital and a community college. Rather than placing the City in the legally untenable situation of having to try to indirectly regulate these entities, the State Board should apply fair, achievable and consistent rules to all dischargers, including these entities.

4. THE DRAFT PERMIT'S RETROFITTING REQUIREMENTS SHOULD BE DELETED

The Draft Permit contains several retrofitting requirements that appear to apply to both dischargers and to local businesses. For example, Section E.9.i.(ii) appears to require the retrofitting of two flood management projects per year. Similarly, Section E.11.b-e appears to require local agencies to mandate that industrial and commercial facilities retrofit their facilities. These requirements should be deleted. The U.S. EPA is currently considering a rulemaking that might ultimately address, among other things, the appropriateness of retrofitting requirements in storm water permits. (See 74 Fed.Reg. 68617.) The State Board should allow U.S. EPA to complete its consideration of that issue as part of its rulemaking process before the State Board includes retrofitting requirements in the Draft Permit.

This comment is of particular concern to Napa in light of the City's involvement in the Napa River Flood Control Project, described above. Upon the completion of this major flood control project, the City should not have to assess or enhance the Napa River for many years. Therefore, to require Napa to "assess at least two existing flood management projects per year" and to require Napa to "implement changes or additions to two flood management projects per year" is unnecessary. It is also not fair to require Napa to demonstrate the infeasibility of such changes or additions to exempt itself from the requirements. These provisions for the Draft Permit should be deleted. If they are not deleted in their entirety, language should be added to make the requirements inapplicable to flood management projects that have been completed within the last ten (10) years.

The State Board should also add language to this section that acknowledges that flood control enhancement projects are multi-year efforts that typically require detailed cooperation between cities, flood control districts and the Army Corps. A more realistic time horizon for such projects must be included in the Draft Permit, and it should be clarified that dischargers are not responsible for such projects if appropriate coordination with and authority from the flood control districts and Army Corps cannot be obtained.

Moreover, the State Board must provide the list of exemptions and/or regulatory relief it will be granting to municipalities in order to complete such project within the timeframe specified. It should be noted that permit exemptions and/or regulatory relief from other state and federal agencies such as the Department of Fish and Game and Army Corps will be required to comply with this timeline; since the State Board lack the authority to compel those agencies to grant such relief, a more realistic timeframe and/or outright exemptions should be included in this permit.

5. THE STATE SHOULD BE RESPONSIBLE FOR INDUSTRIAL AND CONSTRUCTION INSPECTIONS UNDER THE STATE BOARD'S GENERAL PERMITS

The Draft Permit continues the State Board's general approach of pushing inspection obligations for which the State Board collects a fee onto local agencies without providing funding for such inspections. (Draft Permit, Sections E.8.c and E.11.c) As a matter of fairness and good fiscal policy, this trend must stop. The Draft Permit is particularly objectionable in this regard because in addition to requiring local inspections for compliance with the State Board's General Permits, the Draft Permit seeks to compel local agencies to conduct "front-line" enforcement of the State Board's General Permits. According to Section E.4.c.(ii).(d).(2) of the Draft Permit, Napa could only refer facilities to the Regional Board after the City has conducted "good faith" efforts to enforce the State Board's General Permits, which efforts must include, at a minimum, "two follow-up inspections and two warning letters or notices of violations." Such specific direction for local agencies to assume the State's obligation to enforce its own General Permits is simply not fair, especially when the State Board is not willing or is unable to share the funding for such inspections with local agencies.

Napa is very sensitive to budget constraints, and understands the State Board's own lack of funding. However, the State Board's budget constraints do not justify a wholesale transfer of inspection obligations to local agencies, particularly when the State Board collects a fee to fund such inspections.

6. THE DRAFT PERMIT'S COMMERCIAL INSPECTION REQUIREMENTS SHOULD BE DELETED

The Draft Permit contains very detailed inventory and inspection requirements for commercial facilities. (Draft Permit, Sections E.11.a and E.11.c.) Despite the fact that most commercial facilities have no impact on water quality, the Draft Permit requires that Napa designate 20% of the commercial facilities within the City as high priority and inspect those facilities annually. (Draft Permit, Section E.11.c and E.11.d.) These commercial inspection requirements are very costly to implement and will not have measurable impacts on water quality. They should therefore be deleted.

7. THE DRAFT PERMIT'S REPORTING REQUIREMENTS SHOULD BE REDUCED

The Draft Permit contains both general reporting requirements and specific reporting requirements within each of the major program elements. (See, e.g., Draft Permit, Sections E.16 and E.10.(iii).) These reporting requirements are often duplicative and will only serve to keep City staff in the office, not out in the field implementing the program. The State Board should minimize the reporting requirements and streamline the reporting process.

8. THE DRAFT PERMIT'S PRESCRIPTIVE EDUCATION REQUIREMENTS SHOULD BE DELETED

The Draft Permit contains very prescriptive public education requirements. (Draft Permit, Section E.5.) These requirements go so far as to mandate the use of the "social marketing" approach of Canadian environmental psychologist Doug McKenzie-Mohr known as "Community-

Based Social Marketing (CBSM)". It is not appropriate for the State Board to require dischargers to "sole source" their public education approach. Napa has specific qualification based consultant selection and public bidding requirements, and the State Board lacks the authority to usurp Public Contract Code and our local municipal ordinances regarding this selection process. This and the other prescriptive education requirements should be deleted, and the education section should follow the educational requirements of the Phase II Regulations.

9. THE DRAFT PERMIT'S POST-CONSTRUCTION REQUIREMENTS SHOULD BE MODIFIED TO PROMOTE RATHER THAN INHIBIT SMART GROWTH

The Draft Permit's post-construction requirements are inconsistent with smart growth concepts, including those "Sustainable Community Strategies" promulgated in conjunction with SB 375, and should be deleted or substantially revised. Implementation of the volumetric hydromodification requirements of Draft Permit Section E.12 will result in a de facto prohibition in small lot, in-fill development because it will be impossible and or cost-prohibitive to set aside sufficient land to achieve the runoff retention requirements in regions with poorly draining soils such as Napa.

This issue is of particular concern to Napa and Napa County. As noted above, more than 50% of the population of Napa County lives in the City of Napa. The land-use policies of Napa County include zoning provisions that encourage urban in-fill development over sprawl, including the Agricultural Resource and Agricultural Watershed land use designations. This land-use approach has been very successful over the past three decades in preventing urban sprawl and thereby reducing storm water runoff in the watershed.

The provisions of Section E.12 threaten to undermine Napa's long-standing land use policies that have direct water quality benefits. The provisions should be deleted and revised to encourage, rather than discourage, in-fill development. At a minimum, the Permit should be revised to recognize the water quality benefits associated with land-use policies that prevent urban sprawl and reward municipalities such as Napa with an exemption to these provisions.

10. THE DRAFT PERMIT'S RECEIVING WATER MONITORING REQUIREMENTS SHOULD BE DELETED OR MODIFIED TO ADDRESS TIDAL RIVERS SUCH AS THE NAPA RIVER

The Draft Permit includes new receiving water monitoring provisions. (Draft Permit, Section E.13) As these receiving water monitoring provisions exceed the six minimum measures established by U.S. EPA as necessary to achieve the reduction of pollutants from the MS4s to the MEP, the City objects to the inclusion of the monitoring provisions and requests that they be deleted.

If the State Board determines under state law that receiving water monitoring provisions should remain in the Draft Permit, the City requests that the provisions be modified to address receiving waters, such as the Napa River, that are influenced by the tides. The last approximately 17 miles of the Napa River is an estuary system that ebbs and flows with the tide. Therefore, pollutants discharged into the Napa River downstream of the City many, depending upon the tide,

migrate into the City's jurisdiction. It would not be consistent with the point-source nature of the State's NPDES program to hold Napa responsible for pollutants that Napa did not discharge to the receiving water. For this reason, the receiving water monitoring provisions of the Draft Permit, if they remain at all, should be revised to address this point.

CONCLUSION/RECOMMENDATION

While the City recognizes the Board staff's efforts to develop the Draft Permit are well-intentioned many of the proposed elements will provide little, if any, demonstrable benefit towards our Program's goals. Moreover, the Draft Permit represents a "one-size fits all" approach to stormwater management that either ignores or otherwise threatens to undermine our successful local efforts. Furthermore, many important issues unique to small municipal agencies such as ours were not addressed because their representatives were excluded from participating in the processing drafting of it. Therefore, Napa recommends the Board commission a new steering committee that includes representatives from local agencies such as ours to develop the Revised Draft Permit. Such an initiative should take only two or three months to complete and would likely result in a document that is more acceptable to all parties involved and we would like to be the first to volunteer our staff's time in this new initiative.

Thank you for your consideration in this matter.

Regards,,



Jill Techel
Mayor, City of Napa

C/c w/encl.

State Senator Noreen Evans
State Senator Lois Wolk
State Assemblymember Mariko Yamada
State Assemblymember Michael Allen
Napa City Council
Napa County Board of Supervisors
Napa Chamber of Commerce
California League of Cities
Statewide Stormwater Coalition
Shawn Hagerty, Best, Best, and Krieger

Encl

Napa's Estimated Cost of Compliance



CITY of NAPA

PUBLIC WORKS DEPARTMENT
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PROGRAM ELEMENT	ANNUAL COSTS	ONE-TIME COSTS	TOTAL COST
E.4 PROGRAM MANAGEMENT ELEMENT	\$ 72,587	\$ 26,402	\$ 100,989
E.5 PUBLIC OUTREACH AND EDUCATION PROGRAM	\$ 240,000	\$ 365,602	\$ 605,602
E.6 PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM	\$ 15,774	\$ 8,433	\$ 24,207
E.7 ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM	\$ 145,130	\$ 57,107	\$ 202,237
E.8 CONSTRUCTION SITE STORM WATER RUNOFF CONTROL PROGRAM	\$ 382,604	\$ 3,577	\$ 386,182
E.9 POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR PERMITTEE OPERATIONS PROGRAM	\$ 1,065,957	\$ 443,450	\$ 1,509,407
E.10 TRASH REDUCTION PROGRAM	\$ 7,680	\$ 13,470	\$ 21,350
E.11 INDUSTRIAL/COMMERCIAL FACILITY RUNOFF CONTROL PROGRAM	\$ 147,037	\$ 211,873	\$ 358,910
E.12 POST CONSTRUCTION STORM WATER MANAGEMENT PROGRAM	\$ 28,505	\$ 540,081	\$ 568,586
E.13 RECEIVING WATER MONITORING	\$ 33,357	\$ 72,000	\$ 105,357
E.14 PROGRAM EFFECTIVENESS ASSESSMENT AND IMPROVEMENT	\$ 98,684	\$ 168,108	\$ 266,791
E.15 TOTAL MAXIMUM DAILY LOADS COMPLIANCE REQUIREMENTS	\$ -	\$ 50,269	\$ 50,269
E.16 ONLINE ANNUAL REPORTING PROGRAM	\$ 22,232	\$ -	\$ 22,232
TOTAL	\$ 2,269,758	\$ 1,982,471	\$ 4,232,229

Other annual costs - permits fees, vehicles, office supply etc.
 MSA Population (2010) 118,788

PROGRAM ELEMENT	TOTAL COSTS	STAFF COSTS	OTHER COSTS
E.4 PROGRAM MANAGEMENT ELEMENT	\$ 100,569	\$ 100,569	\$ -
E.5 PUBLIC OUTREACH AND EDUCATION PROGRAM	\$ 605,602	\$ 15,602	\$ 590,000
E.6 PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM	\$ 24,207	\$ 14,207	\$ 10,000
E.7 ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM	\$ 202,237	\$ 186,537	\$ 12,700
E.8 CONSTRUCTION SITE STORM WATER RUNOFF CONTROL PROGRAM	\$ 386,182	\$ 359,662	\$ 6,500
E.9 POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR PERMITTEE OPERATIONS PROGRAM	\$ 1,509,407	\$ 916,407	\$ 620,000
E.10 TRASH REDUCTION PROGRAM	\$ 21,350	\$ 21,350	\$ -
E.11 INDUSTRIAL/COMMERCIAL FACILITY RUNOFF CONTROL PROGRAM	\$ 358,910	\$ 337,510	\$ 21,500
E.12 POST CONSTRUCTION STORM WATER MANAGEMENT PROGRAM	\$ 568,586	\$ 208,586	\$ 360,000
E.13 RECEIVING WATER MONITORING	\$ 105,357	\$ 16,357	\$ 89,000
E.14 PROGRAM EFFECTIVENESS ASSESSMENT AND IMPROVEMENT	\$ 266,791	\$ 100,791	\$ 156,000
E.15 TOTAL MAXIMUM DAILY LOADS COMPLIANCE REQUIREMENTS	\$ 50,269	\$ 20,269	\$ 30,000
E.16 ONLINE ANNUAL REPORTING PROGRAM	\$ 22,232	\$ 22,232	\$ -
TOTAL	\$ 4,232,229	\$ 2,336,529	\$ 1,895,700

ONE-TIME COST BY YEAR					
	2012 - 13	2013 - 14	2014 - 15	2015 - 16	2016 - 17
\$	744,754.92	258,717.48	737,726.89	101,029.38	94,259.86

COST BY YEAR					
YEAR	2012 - 13	2013 - 14	2014 - 15	2015 - 16	2016 - 17
Base Costs	\$ 2,329,757.84	\$ 2,329,757.84	\$ 2,329,757.84	\$ 2,329,757.84	\$ 2,329,757.84
One Time Costs	\$ 744,754.92	\$ 258,717.48	\$ 737,726.89	\$ 101,029.38	\$ 94,259.86
Total Cost	\$ 3,074,512.76	\$ 2,588,475.32	\$ 3,067,484.73	\$ 2,430,787.22	\$ 2,424,017.72
Est Population	77,000	77,385	77,772	78,161	78,552
Cost per resident	\$ 39.83	\$ 33.45	\$ 39.44	\$ 31.10	\$ 30.85
Cost per household	\$ 101.42	\$ 84.96	\$ 100.18	\$ 78.98	\$ 78.38

AVERAGE ANNUAL COST FOR 5 YEARS	
Total Annual Avg. Cost for 5 Years	\$ 2,717,056
5 Year Avg Population	77,000
Avg Cost per Resident	\$ 35.29
Avg Cost per Household	\$ 82.53

Residents per household 2.54

PERMIT ELEMENT	PERMIT COMPLIANCE TASK (SPECIFIC DATE & MAY VARY) UNLESS OTHERWISE NOTED	STAFF LEVEL	STAFF HOURS PER YEAR	P/T	S/FTE	STAFFING COSTS	OTHER COSTS (containing equipment, labor, etc.)	ANNUAL COST Year 1-3	TOTAL COST	ANNUAL COST	ONE TIME COST	PROGRAM MANAGEMENT ELEMENT					
												2013-13	2014-14	2015-15	2016-16	2017-17	
E.4 PROGRAM MANAGEMENT ELEMENT																	
E.4.1 Local Authority	2013	Deputy PW Director	104	0.000	\$ 208,270	\$ 10,314			\$ 10,313.51		\$ 10,313.51						
		Director	36	0.018	\$ 182,154	\$ 3,040			\$ 3,040.39		\$ 3,040.39						
		Senior Civil Engineer	14	0.008	\$ 182,154	\$ 6,081			\$ 6,080.78		\$ 6,080.78						
E.4.2 Certification	?	Senior Civil Engineer	0.1	0.003	\$ 182,154	\$ 405			\$ 405.39		\$ 405.39						
		Senior Civil Engineer	0.2	0.008	\$ 137,089	\$ 1,028			\$ 1,028.17		\$ 1,028.17						
		Assistant Engineer	0.2	0.015	\$ 115,480	\$ 1,443			\$ 1,443.50		\$ 1,443.50						
		Inspector	0.78	0.018	\$ 117,086	\$ 2,185			\$ 2,184.89		\$ 2,184.89						
E.4.3 Enforcement Measures and Training	2013	Senior Civil Engineer	36	0.006	\$ 182,154	\$ 6,081			\$ 6,080.78		\$ 6,080.78						
		Senior Civil Engineer	78	0.015	\$ 182,154	\$ 6,081			\$ 6,080.78		\$ 6,080.78						
		Assistant Engineer	28	0.015	\$ 182,154	\$ 2,827			\$ 2,826.83		\$ 2,826.83						
E.4.4 Enforce Administrative Provisions to Comply with Order	2013	Senior Civil Engineer	1	0.025	\$ 137,089	\$ 3,427			\$ 3,427.23		\$ 3,427.23						
		Assistant Engineer	1.5	0.020	\$ 115,480	\$ 4,300			\$ 4,300.48		\$ 4,300.48						
		Inspector	20	0.020	\$ 115,480	\$ 67,245			\$ 67,245.85		\$ 67,245.85						
E.4.5 Sub-Total						\$ 100,888.98			\$ 100,888.98		\$ 100,888.98						
E.4.6 Sub-Total						\$ 100,888.98			\$ 100,888.98		\$ 100,888.98						
E.5 General Program Management																	
E.5.1 PUBLIC OUTREACH AND EDUCATION PROGRAM																	
E.5.2 Compliance Options	2013	Engineering Assistant	4	0.100	\$ 115,480	\$ 11,548			\$ 11,547.97		\$ 11,547.97						
E.5.3 Public Outreach and Education	2013	Senior Civil Engineer	1	0.025	\$ 182,154	\$ 4,054			\$ 4,053.85		\$ 4,053.85						
		Assistant Engineer	52	0.025	\$ 115,480	\$ 390,000			\$ 390,000.00		\$ 390,000.00						
E.5.4 Public Outreach and Education	2013	Senior Civil Engineer	1	0.000	\$ -	\$ 180,000			\$ 180,000.00		\$ 180,000.00						
E.5.5 Public Outreach and Education	2013	Assistant Engineer	0	0.025	\$ -	\$ 850,000.00			\$ 850,000.00		\$ 850,000.00						
E.5.6 Sub-Total						\$ 18,601.82			\$ 18,601.82		\$ 18,601.82						
E.6 PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM																	
E.6.1 Public Outreach and Education	2013	Senior Civil Engineer	0.1	0.000	\$ 182,154	\$ 405			\$ 405.39		\$ 405.39						
		Assistant Engineer	1.2	0.025	\$ 115,480	\$ 5,141			\$ 5,140.85		\$ 5,140.85						
		Inspector	2	0.025	\$ 115,480	\$ 2,887			\$ 2,886.99		\$ 2,886.99						
		Assistant Engineer	104	0.050	\$ 115,480	\$ 5,774			\$ 5,773.99		\$ 5,773.99						
		Inspector	2	0.158	\$ -	\$ 14,207.21			\$ 14,207.21		\$ 14,207.21						
E.6.2 Sub-Total						\$ 14,207.21			\$ 14,207.21		\$ 14,207.21						
E.7 ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM																	
E.7.1 MS4 Mapping	2014	Assistant	16	0.250	\$ 137,089	\$ 34,272			\$ 34,272.32		\$ 34,272.32						
E.7.2 Identifying Priority Areas	2014	Engineering Assistant	13	0.325	\$ 115,480	\$ 37,531			\$ 37,530.81		\$ 37,530.81						
E.7.3 Field Screening to Detect Illicit Discharges	2015	Assistant	2	0.125	\$ 115,480	\$ 14,435			\$ 14,434.86		\$ 14,434.86						
E.7.4 Illicit Discharge Detection and Elimination Source Investigation	2016	Assistant	2	0.050	\$ 115,480	\$ 5,774	\$ 3,700		\$ 5,773.89	\$ 3,700.00	\$ 5,773.89						
		Assistant	20	0.025	\$ 115,480	\$ 72,175			\$ 72,174.82		\$ 72,174.82						
E.7.5 Staff Response Plan	2013	Assistant	1.5	0.008	\$ 137,089	\$ 5,141			\$ 5,140.85		\$ 5,140.85						
E.7.6 Illicit Discharge Education & Training	2015	Assistant	5	0.125	\$ 115,480	\$ 14,435			\$ 14,434.86		\$ 14,434.86						
E.7.7 Illicit Discharge Education & Training	2015	Assistant	2	0.050	\$ 115,480	\$ 5,774			\$ 5,773.99		\$ 5,773.99						
E.7.8 Sub-Total						\$ 181,636.78	\$ 12,700.00		\$ 194,336.78		\$ 194,336.78						
E.8 CONSTRUCTION SITE STORM WATER RUNOFF CONTROL PROGRAM																	
E.8.1 Construction Site Survey	August 15, 2012	Inspector	20	0.800	\$ 117,086	\$ 58,533			\$ 58,533.00		\$ 58,533.00						
E.8.2 Construction Site Inspection and Enforcement	2013	Assistant	0.1	0.001	\$ 115,480	\$ 289			\$ 289.70		\$ 289.70						
E.8.3 Construction Site Inspection and Enforcement	2014	Assistant	30	0.500	\$ 115,480	\$ 67,150			\$ 67,149.85		\$ 67,149.85						
E.8.4 Permits Staff Training	2014	Assistant	48	2.000	\$ 117,086	\$ 234,131			\$ 234,131.19		\$ 234,131.19						
E.8.5 Construction Site Operator Education	2015	Assistant	2	0.050	\$ 115,480	\$ 5,774			\$ 5,773.99		\$ 5,773.99						
E.8.6 Sub-Total						\$ 3,000	\$ 1,000		\$ 3,985.64		\$ 3,985.64						
E.9 POLLUTION PREVENTION/GOODS HOUSEKEEPING FOR PERMITTEE OPERATIONS PROGRAM																	
E.9.1 Construction Site Operator Education	2015	Inspector	0.1	0.025	\$ 117,086	\$ 2,827			\$ 2,826.83		\$ 2,826.83						
E.9.2 Sub-Total						\$ 2,826.83			\$ 2,826.83		\$ 2,826.83						

Year 1 cost
Year 2 cost
Year 3 cost

per hour for

PUBLIC OUTREACH AND EDUCATION PROGRAM
ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM
CONSTRUCTION SITE STORM WATER RUNOFF CONTROL PROGRAM
POLLUTION PREVENTION/GOODS HOUSEKEEPING FOR PERMITTEE OPERATIONS PROGRAM

