

City of Sonoma

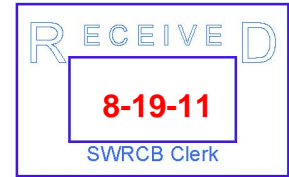
Sonoma Sister Cities:

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Sonoma, California 95476-6618
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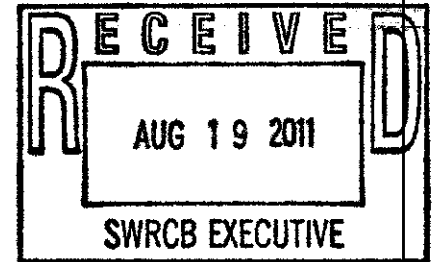
Aswan, Arab Republic of Egypt
Chambolle-Musigny, France
Greve in Chianti, Italy
Kaniv, Ukraine
Patzcuaro, Mexico

August 18, 2011



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-200

Subject: Comment Letter –Phase II Small MS4 General Permit



Dear Ms. Townsend and Members of the Board:

The City of Sonoma appreciates the opportunity to provide comments on the subject of the Phase II Small MS4 General Permit (draft Permit). The City of Sonoma respectfully requests that the State Water Resources Control Board consider the following comments (by section) when reviewing the proposed draft Permit. In addition, a copy of the estimated costs associated with the City of Sonoma has been enclosed for your reference. Please note that the City's current Stormwater budget is \$35,000, a \$15,000 increase from last year's budget. In order to comply with the draft Permit the City will be required to increase the annual budget to \$115,497 with an additional \$37,215 in one-time costs, essentially tripling the existing stormwater budget. Given the City's current population of 10,648 this would result in an average annual program cost of \$23.32 per household (based on 2.15 persons per household). This amount far exceeds the U.S. EPA estimated costs of \$9.16 per household¹, as suggested on page 10 of the Fact Sheet. As you know many cities in California are facing incredible budget shortfalls and the City of Sonoma simply does not have the resources available to implement the draft Permit in its current form. The City of Sonoma is concerned that if the draft Permit is adopted in its current form the City of Sonoma will be out of compliance by the first year.

At the State Water Resources Control Board meeting on August 17, 2011, board members requested specific feedback regarding prioritization and ideas on dealing with stormwater costs. In response to the board members requests the City of Sonoma is confident that the Public Involvement and Participation Program is the most important element of the stormwater program and should continue to be a priority. One idea to help with costs would be to revise Proposition 218 to allow stormwater taxes to be assessed without voter approval. Finally, a comment was made at the meeting on August 17, 2011, that there had been no noticeable improvements in stormwater issues since 2003. The

¹ Federal Register / Vol. 64, No. 235 / Wednesday, December 8, 1999 / Rules and regulations. P. 68791-68792.

City of Sonoma challenges that opinion; indeed, the City has worked hard to promote stormwater education. Because of the ongoing partnerships with other agencies, such as the Ecology Center, North Bay Watershed Association and other municipalities within our region, we have seen trash reduced in storm drains and creeks, restaurants no longer rinsing floor mats near storm drains, we have developed a strong construction inspection program, all City employees are trained to immediately report illicit discharge, and post construction BMPs are promoted with every construction project. The City of Sonoma feels that these are very important improvements that should not go unnoticed by the State Water Resources Control Board.

Specific comments by section:

Section E.4.b.iii: Do not require the Permittee's legal counsel to certify the Permittee has adequate legal authority to comply with all Order requirements. The City of Sonoma contracts out for counsel review and is charged an hourly rate. Requiring counsel to perform this task will ensure that counsel reviews the entire stormwater program and could be cost prohibitive and consume the majority of staff time answering council questions that could be otherwise spent on implementing the stormwater program. Instead the draft Permit should allow the Permittee's Stormwater Program Administrator to certify the Permittee has adequate legal authority to comply with all Order requirements.

Section E.4.d: It is unreasonable to require the Permittee to secure the resources necessary to meet all requirement of this Order. It is abundantly clear that the City of Sonoma will not have adequate resources (staffing and funding) necessary to comply with the draft Permit. Instead, the Permittee should be required to submit the annual stormwater budget including a summary detail of all budget items.

Section E.5.b.ii.a: The Permittee should not be required to use a Community-Based Social Marketing strategies or equivalent. Instead the Permittee should be allowed to create a Public Outreach and Education Program based on its own unique community goals and watershed attributes. This would allow for a community-based approach that would be much more effective. Simply spending money to meet the requirement does not make for a more effective stormwater program.

Section E.5.b.ii.b: The Permittee should not be required to implement surveys to gage the level of awareness and behavior change in target audiences and effectiveness of education tasks. The City of Sonoma has a population of 10,648 and has found that the use of surveys does not provide useful information. Indeed, surveys are time consuming and use up valuable staff time that could be used to implement a more successful stormwater program. Instead the City would like to use the time engaging in face-to-face conversations with the target audience on specific desired behaviors such as the importance of picking up waste from pets and why it is imperative to reduce the pathogen levels in Sonoma Creek.

Section E.5.b.ii.c: The Permittee should not be required to use a Community-Based Social marketing strategies or equivalent. Instead the Permittee should be allowed to

create a Public Outreach and Education Program based on its own unique community goals and watershed attributes. This would allow for a community-based approach that would be much more effective. Simply spending money to meet the requirement does not make for a more effective stormwater program.

Section E.5.b.ii.i: "Technical and financial assistance and implementation guidance related to storm water-friendly landscaping". Staff is unclear as to what this section is requiring; please be more specific.

Section E.5.b.ii.l: While the City of Sonoma appreciates the importance of teaching children about stormwater, the fact remains that the No Child Left Behind program currently administered by the State of California limits the available classroom time for many programs such as stormwater education programs. Please be more specific in how Permittees can gain access to classrooms.

Section E.5.b.ii.m: The Permittee should not be required to reduce discharges from charity car washes, mobile cleaning and pressure washing operations, and landscape irrigation. The City of Sonoma provides charity car wash kits to the public to use free of charge. Unfortunately, most of the events take place on the weekend when staff is not available. In addition, the City of Sonoma is concerned that it may receive negative feedback from the political community if it attempts to regulate charity organizations. Instead the City of Sonoma would like to include charity car wash organizers and mobile cleaning and pressure washing operations in its Public Outreach and Education Program. In addition, the Model Water Efficient Landscape Ordinance (AB 1881) already regulates discharges from landscape irrigation. The City of Sonoma is concerned that this requirement is redundant and should be removed.

Section E.5.b.iii: Permittees should not be required to report on the public education strategy and general program as specifically as required in this section. Instead, Permittees should be allowed to report on the activities completed in individual Public Outreach and Education Programs.

Section E.5.c: This entire section should be removed. The City of Sonoma does not have the staff or financial resources to comply with this requirement. In addition, these requirements should be covered under the Industrial Permit. The City of Sonoma currently responds to reports of illicit discharge violations from industrial and commercial facilities, but expecting the City of Sonoma to implement a Community-Based Social Market program for industrial and commercial facilities is not within acceptable limits.

Section E.5.c.i: Permittees should not be required to develop and implement a comprehensive industrial/commercial outreach and education program. This requirement should be covered under the Industrial Permit. Perhaps the Regional Water Board could be responsible for implementing this requirement.

Section E.5.c.ii.a: Permittees should not be required to develop a watershed-based inventory of high priority industrial and commercial facilities. Identifying 20 percent of the Permittee's urbanized boundary is arbitrary. Instead Permittees should respond to reports of illicit discharge violations and educate industrial and commercial facilities on a case-by-case basis. Perhaps the Regional Water Board could be responsible for implementing this requirement.

Section E.5.c.ii.b: Permittees should not be required to develop and implement an industrial/commercial outreach program. This requirement should be covered under the Industrial Permit. Instead Permittees should respond to reports of illicit discharge violations and educate industrial and commercial facilities on a case-by-case basis. Perhaps the Regional Water Board could be responsible for implementing this requirement.

Section E.5.c.ii.c: Permittees should not be required to implement a Community-Based Social Marketing program to address the Permittee's highest priority water quality problems. The City of Sonoma does not have a history of having water quality problems from industrial and commercial facilities. Instead the City of Sonoma should be allowed to focus on its measurable water quality problem identified in the Sonoma Creek TMDL, which has been identified as pathogens. The City of Sonoma would have a more productive stormwater program if it was allowed to focus more on public outreach and communication and informing the target audience about the importance of picking up pet waste.

Section E.5.c.ii.d: The Permittee should not be required to identify the frequency at which outreach shall be conducted. This requirement should be covered under the Industrial Permit. Instead Permittess should respond to reports of illicit discharge violations and educate industrial and commercial facilities on a case-by-case basis. Perhaps the Regional Water Board could be responsible for implementing this requirement.

Section E.5.c.ii.e: The Permittee should not be required to conduct outreach to industrial/commercial facilities. This requirement should be covered under the Industrial Permit. Instead Permittes should respond to reports of illicit discharge violations and educate industrial and commercial facilities on a case-by-case basis. Perhaps the Regional Water Board could be responsible for implementing this requirement.

Section E.5.c.iii: The Permittee should not be required to report program progress and mechanisms used for outreach and education. This requirement should be covered under the Industrial Permit. Instead Permittes should respond to reports of illicit discharge violations and educate industrial and commercial facilities on a case-by-case basis. Perhaps the Regional Water Board could be responsible for implementing this requirement.

Section E.5.d.ii: The City of Sonoma considers this requirement too prescriptive. Instead Permittees should be required to develop and implement a construction outreach and

education strategy based on individual community issues. The City of Sonoma currently conducts site visits for 50 percent of active construction sites prior to a rain event predicted to produce over a ½ inch of rain. If BMPs are not installed correctly the City takes action immediately. The City believes this approach is more effective than the prescriptive requirements set forth in this section.

Section E.6. The City of Sonoma is confident that the Public Involvement and Participation Program is the most important element of the stormwater program. The City of Sonoma will actively continue to encourage volunteerism, public comment and input on policy, and activism in the community.

Section E.7.d: The Permittee should not be required to use the Center for Watershed Protection's guide on Illicit Discharge Detection and Elimination or equivalent, to develop and implement an IDDE program to detect, investigate, and eliminate illicit discharges, including illegal dumping, into its MS4 (note: typo in last sentence in draft Permit). The Center for Watershed Protection's guide on Illicit Discharge Detection and Elimination in itself is 176 pages, not including references and Technical Appendices. The City of Sonoma considers the requirements in this section too prescriptive, will require extraordinary amounts of staff time to implement, too costly, and will not assist the City of Sonoma in improving the existing stormwater program. Instead Permittees should be required to develop and implement a spill response plan and respond to reports of illicit discharge violations and educate violators on a case-by-case basis.

The City of Sonoma is not aware of a significant amount of issues related to illicit discharges within city limits. Instead the City of Sonoma should be allowed to focus on its measurable water quality problem identified in the Sonoma Creek TMDL, which has been identified as pathogens. The City of Sonoma would have a more productive stormwater program if it was allowed to focus more on public outreach and communication and informing the target audience about the importance of picking up pet waste.

Section E.7.a.ii.a: The storm drain map should not be required to include drainage areas contributing to the outfalls. This is an expensive and staff intensive requirement. The City of Sonoma has a current stormdrain map identifying outfalls and considers this to be sufficient. It is also unclear as to how the drainage area is defined. Please be specific in what is being requested.

Section E.7.a.ii.b: Each mapped outfall should not be located using a geographic position system. In addition, photographs should not be required to be taken of each outfall. This is an expensive and staff intensive requirement. The City of Sonoma has a current stormdrain map identifying outfalls and considers this to be sufficient. Instead, Permittees should be required to photograph the outfalls when a complaint is received regarding illicit discharge. This could then be entered into the baseline information to track operation and maintenance needs over time.

Section E.7.a.ii.c: Priority areas should not be required to be identified. Identifying 20 percent of the Permittee's urbanized boundary is arbitrary and wasteful. Instead Permittees should respond to reports of illicit discharge violations and educate violators on a case-by-case basis.

Section E.7.a.ii.d: Field screening stations should not be required to be identified. (See comments for Section E.7.c). This is an expensive and staff intensive requirement and should be removed from the draft Permit.

Section E.7.b.i: The Permittee should not be required to develop a list of priority areas that are likely to have illicit discharges. The City of Sonoma feels that the requirements in this section are too prescriptive, require extraordinary amounts of staff time to implement, are too costly, and will not assist the City of Sonoma in improving the existing stormwater program. Instead Permittees should be required to develop and implement a spill response plan and respond to reports of illicit discharge violations and educate violators on a case-by-case basis.

Section E.7.b.ii: The Permittee should not be required to identify 20 percent of the urbanized boundary as priority. Identifying 20 percent of the Permittee's urbanized boundary is arbitrary and wasteful. Instead Permittees should respond to reports of illicit discharge violations and educate violators on a case-by-case basis.

Section E.7.b.iii: The Permittee should not be required to submit the basis for selecting each priority area and creating a list of all priority areas identified in the system. Instead Permittees should respond to reports of illicit discharge violations and educate violators on a case-by-case basis.

Section E.7.c.i: The Permittee should not be required to develop and implement a dry weather field screening and analytical monitoring program. The City of Sonoma is concerned that the requirements in this section are too prescriptive, require extraordinary amounts of staff time to implement, are too costly, and will not assist the City of Sonoma in improving the existing stormwater program. Instead Permittees should be required to develop and implement a spill response plan and respond to reports of illicit discharge violations and educate violators on a case-by-case basis.

Section E.7.c.ii: The Permittee should not be required to conduct field observations, field screening monitoring, and analytical monitoring at selected stations. The City of Sonoma is concerned that the requirements in this section are too prescriptive, require extraordinary amounts of staff time to implement, too costly, and will not assist the City of Sonoma in improving the existing stormwater program. Instead Permittees should be required to develop and implement a spill response plan and respond to reports of illicit discharge violations and educate violators on a case-by-case basis.

Section E.7.c.iii: The Permittee should not be required to submit a report summarizing the field screening and analytical monitoring program procedures, including a summary of the filed screening and illicit discharge investigation results. The City of Sonoma is

concerned that the requirements in this section are too prescriptive, require extraordinary amounts of staff time to implement, too costly, and will not assist the City of Sonoma in improving the existing stormwater program. Instead Permittees should be required to develop and implement a spill response plan and respond to reports of illicit discharge violations and educate violators on a case-by-case basis.

Section E.8.b.ii.a: Please include a definition for construction activity. What quantity of soil must be disturbed to be considered a construction activity? Is this for all construction sites or just sites over one acre?

Section E.8.b.ii.c: The Permittee should only be required to verify if the construction site operator has submitted a NOI consistent with the Construction General permit. If the Permittee will be required to also verify that the construction site operators have existing coverage under applicable permits including the State Water Board 401 Water Quality Certification, U.S. Army Corp 404 permit, and California Department of Fish and Game 1600 Agreement, please provide instructions on how Permittee will achieve the verification.

Section E.8.d.ii: Do not require Permittees to be a Qualified SWPPP Developer (QSD). The City of Sonoma does not currently employ staff that meet the requirements to become a QSD. Instead require Permittees to have on staff Certified Stormwater Inspectors.

Section E.8.e.iii: Do not require Permittees to track training attended by contractors and do not require surveys be done to demonstrate the awareness and potential behavioral changes in the attendees. This is a time consuming task that will take time away from running an efficient stormwater program. Instead allow Permittees to provide information to contractors on training opportunities for construction operators as required in section E.8.e.

Section E.9.i: Define the term flood management facility.

Section E.9.ii: It is unclear if the City of Sonoma has any flood management projects. The City of Sonoma requests this section be revised to state "By May 15, 2015, the Permittee shall assess existing flood management projects to determine whether changes or additions can be made to enhance water quality and habitat functions". The draft Permit requires the Permittee to implement changes to two flood management projects per year. What if Permittees do not have two flood management projects?

Section E.11.a: This section should be removed. This requirement should be covered under the Industrial Permit. Instead Permittees should respond to reports of illicit discharge violations and educate industrial and commercial facilities on a case-by-case basis. Perhaps the Regional Water Board could be responsible for implementing this requirement.

Section E.11.a.ii.a: Permittees should not be required to incorporate the facility information into GIS. This is an expensive and staff intensive requirement. Perhaps the Regional Water Board could be responsible for implementing this requirement.

Section E.11.a.ii.c: Permittees should not be required to determine if the facilities is required to be covered under a NPDES permit. This requirement should be covered under the Industrial Permit. Instead Permittees should respond to reports of illicit discharge violations and educate industrial and commercial facilities on a case-by-case basis. Perhaps the Regional Water Board could be responsible for implementing this requirement. If the draft Permit includes this requirement instructions on how to verify coverage should be included in the draft Permit.

Section E.11.a.ii.g.1: The draft Permit should provide the SIC codes for Commercial and industrial facilities identified in E.11.b.1 and E.11.b.2.

Section E.11.a.ii.g.10: Define the term "Site/Source design".

Section E.11.b: This section should be removed. This requirement should be covered under the Industrial Permit. Instead Permittees should respond to reports of illicit discharge violations and educate industrial and commercial facilities on a case-by-case basis. Perhaps the Regional Water Board could be responsible for implementing this requirement.

Section E.11.c: This section should be removed. This requirement should be covered under the Industrial Permit. Instead Permittees should respond to reports of illicit discharge violations and educate industrial and commercial facilities on a case-by-case basis. Perhaps the Regional Water Board could be responsible for implementing this requirement.

Section E.12.d: Please confirm that Renewal Traditional Small MS4 Permittees with a population of 25,000 or less shall only be responsible for complying with the Construction General Permit and not E.12.a through E.12.b.8.

Section E.14: This section should be removed. Instead of requiring permittees to track short and long-term progress of the storm water program, permittees limited resources should be spent implementing a more effective stormwater program. The City of Sonoma would have a more productive stormwater program if it was allowed to focus more on public outreach and communication and informing the target audience about the importance of picking up pet waste.

Section E.14.a.ii.c.2.i: The Permittee should not be required to implement surveys to gage the level of awareness and behavior change in target audiences and effectiveness of education tasks. The City of Sonoma has a population of 10,648 and has found that the use of surveys does not provide useful information. Indeed, surveys are time consuming and use up valuable staff time that could be used to implement a more successful stormwater program. Instead the City would like to use the time engaging in face-to-face

conversations with the target audience on specific desired behaviors such as the importance of picking up waste from pets and why it is imperative to reduce the pathogen levels in Sonoma Creek.

Section E.14.a.ii.d.2: Do not require science-based estimates of pollutant load removal for BMPs (e.g. removal of heavy metals through a bioswale). This is an expensive and staff intensive requirement and heavy metals have not been identified as a challenge for the City of Sonoma.

Section E.14.a.ii.e: Do not require Water Quality Monitoring Data. This is an expensive and staff intensive requirement. Instead, permittees limited resources should be spent implementing a more effective stormwater program. The City of Sonoma would have a more productive stormwater program if it was allowed to focus more on public outreach and communication and informing the target audience about the importance of picking up pet waste.

Section E.14.b.ii: Permittees should not be required to develop and implement a methodology similar to the Lake Tahoe BMP Rapid Assessment methodology to inventory, map, and determine the relative maintenance condition of the urban storm water BMPs. This is an expensive and staff intensive requirement. Instead the Permittee could be required to develop and implement a methodology to inventory, map and determine the maintenance condition of the Post Construction BMPs.

Section E.14.b.ii.a: Post Construction BMPs should not be required to be inventoried and mapped until installed.

Section E.14.c.i: The requirement for identifying stormwater retrofit opportunities should be removed. This is an expensive and staff intensive requirement.

Section E.14.c.ii: This section should be removed. This is an expensive and staff intensive requirement that is based on assumptions that would not result in useful information that would not result in a more effective stormwater program.

Section E.14.d: This section should be removed. This is an expensive and staff intensive requirement that is based on assumptions that would not result in useful information that would not result in a more effective stormwater program.

Section E.15: On page 6 of attachment G, please explain why the City of Sonoma has been identified as a Municipality with responsibility for a TMDL in Calabazas Creek. Calabazas Creek is not located within the City of Sonoma limits.

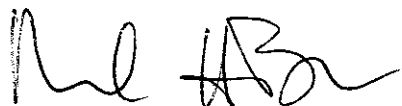
Section E.15.d: It is unclear as to the monitoring requirements for the Sonoma Creek TMDL. Is monitoring required? If so, please be specific as to the type and frequency. At this time the City of Sonoma is unable to determine the costs associated with complying with the TMDL. More information is required before the City of Sonoma can comment on this section.

Thank you again for the opportunity to comment on the draft Permit. We look forward to continuing to work with you and your staff toward a positive outcome on this critical program. Please contact Wendy Atkins directly at (707) 933-2204 should you have any questions or wish to discuss.

Sincerely,



Wendy Atkins
Stormwater Coordinator



Milenka Bates
Public Works Director

cc: Jared Huffman
Assembly Member 6th District
11 English Street
Room 15
Petaluma, CA 94952

Senator Noreen Evans
State Capitol
1303 10th Street
Sacramento, CA 95814

Mr. Bruce Wolfe
Executive Director
California Regional Water Quality Control Board
1515 Clay St., #1400
Oakland, CA 94612

Mayor Laurie Gallian
Councilmembers Barbose, Brown, Rouse, and Sanders

Linda Kelly, City Manager

| PROGRAM MANAGEMENT ELEMENT | PERMITTING/COMPLIANCE YEAR(S) (SCHEDULED, MAY VARY, UNLESS OTHERWISE NOTED) | STAFF LEVEL | STAFF OUTSOURCING | STAFF HOURS PER YEAR | FILE | TIME | STAFFING COSTS | OTHER COSTS (OPERATIONALS/STAFFING) | ANNUAL COST (\$) | TOTAL COST (\$) | ANNUAL COST (\$) | NET COST (\$) |
|---|---|----------------------------------|-------------------|----------------------|------------|------------|----------------|-------------------------------------|------------------|-----------------|------------------|---------------|
| E.4 Legal Authority | 2013 | City Eng. Stormwater Coordinator | | 8 | 0.00384615 | \$ 480,880 | \$ 1,888 | | 2 | \$ 1,888 | \$ 1,888.00 | \$ 1,888.00 |
| E.4.a Legal Authority | 2013 | Stormwater Coordinator | | 8 | 0.00384615 | \$ 85,704 | \$ 330 | | 2 | \$ 330 | \$ 329.63 | \$ 329.63 |
| E.4.b Certification | 2013 | Stormwater Coordinator | | 18 | 0.00965288 | \$ 85,704 | \$ 742 | | 2 | \$ 742 | \$ 741.67 | \$ 741.67 |
| E.4.c Enforcement Measures and Tracking | 2013 | Stormwater Coordinator | | 54 | 0.0258154 | \$ 85,704 | \$ 2,225 | | 2 | \$ 2,225 | \$ 2,225.01 | \$ 2,225.01 |
| E.4.c Enforcement Measures and Tracking | 2013 | City Eng. Stormwater Coordinator | | 4 | 0.00192308 | \$ 490,880 | \$ 944 | | 2 | \$ 944 | \$ 944.00 | \$ 944.00 |
| E.4.c Enforcement Measures and Tracking Annually | 2013 | Stormwater Coordinator | | 1 | 0.00048077 | \$ 85,704 | \$ 41 | | 1 | \$ 41 | \$ 41.20 | \$ 41.20 |
| E.4.d Ensure Adequate Resources to Comply with Order | 2013 | Stormwater Coordinator | | 40 | 0.01923077 | \$ 85,704 | \$ 1,648 | | 1 | \$ 1,648 | \$ 1,648.15 | \$ 1,648.15 |
| E.4 Sub-Total | | | | | 0.00384615 | \$ 85,704 | \$ 1,888 | | 1 | \$ 1,888 | \$ 1,889 | \$ 1,890 |
| E.5 PUBLIC OUTREACH AND EDUCATION PROGRAM | | | | | | | | | | | | |
| E.5.a Compliance Options | 2013 | Stormwater Coordinator | | 40 | 0.01923077 | \$ 85,704 | \$ 1,648 | | 2 | \$ 1,648 | \$ 1,648.15 | \$ 1,648.15 |
| E.5.b Public Outreach and Education | 2013 | Stormwater Coordinator | | 162 | 0.07788466 | \$ 85,704 | \$ 6,875 | | 2 | \$ 6,875 | \$ 6,875.02 | \$ 6,875.02 |
| E.5.b Public Outreach and Education | 2013 | Stormwater Coordinator | | 40 | 0.01923077 | \$ 85,704 | \$ 1,648 | | 1 | \$ 1,648 | \$ 1,648.15 | \$ 1,648.15 |
| E.5.c Industrial / Commercial Outreach and Education Program | 2013 | Stormwater Coordinator | | 208 | 0.1 | \$ 85,704 | \$ 8,570 | | 2 | \$ 8,570 | \$ 8,570.40 | \$ 8,570.40 |
| E.5.d Construction Outreach and Education Program | 2013 | Stormwater Coordinator | | 40 | 0.01923077 | \$ 85,704 | \$ 1,648 | | 2 | \$ 1,648 | \$ 1,648.15 | \$ 1,648.15 |
| E.5 Sub-Total | | | | | 0.23576922 | \$ 85,704 | \$ 16,480 | | 2 | \$ 16,480 | \$ 16,481.52 | \$ 16,481.52 |
| E.6 PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM | | | | | | | | | | | | |
| E.6 Public Involvement and Participation Program | 2013 | Stormwater Coordinator | | 20 | 0.00961538 | \$ 85,704 | \$ 824 | | 2 | \$ 824 | \$ 824.08 | \$ 824.08 |
| E.6 Sub-Total | | | | | 0.00096154 | \$ 85,704 | \$ 82 | | 1 | \$ 82 | \$ 82.41 | \$ 82.41 |
| E.7 ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM | | | | | | | | | | | | |
| E.7.a MS4 Mapping | 2014 | Stormwater Coordinator | | 40 | 0.01923077 | \$ 85,704 | \$ 1,648 | | 2 | \$ 1,648 | \$ 1,648.15 | \$ 1,648.15 |
| E.7.b Identifying Priority Areas | 2014 | Stormwater Coordinator | | 14 | 0.00673077 | \$ 85,704 | \$ 577 | | 2 | \$ 577 | \$ 576.85 | \$ 576.85 |
| E.7.c Field Screening to Detect Illicit Discharges | 2015 | Stormwater Coordinator | | 16 | 0.00789231 | \$ 85,704 | \$ 659 | | 2 | \$ 659 | \$ 659.28 | \$ 659.28 |
| E.7.c Urban Watch Program | 2016 | Stormwater Coordinator | | | | | | | | | | |
| E.7.c Field Screening to Detect Illicit Discharges: Field Screening | 2015 | Stormwater Coordinator | | 80 | 0.03946154 | \$ 85,704 | \$ 3,286 | | 1 | \$ 3,286 | \$ 3,286.31 | \$ 3,286.31 |
| E.7.c Field Screening to Detect Illicit Discharges Investigations | 2016 | Stormwater Coordinator | | 20 | 0.0128 | \$ 85,704 | \$ 1,071 | | 1 | \$ 1,071 | \$ 1,071.30 | \$ 1,071.30 |
| E.7.d Illicit Discharge Detection and Elimination Source | 2013 | Stormwater Coordinator | | 2 | 0.0008154 | \$ 85,704 | \$ 82 | | 2 | \$ 82 | \$ 82.41 | \$ 82.41 |
| E.7.a Spill Response Plan | 2013 | City Eng. Stormwater Coordinator | | 2 | 0.0008154 | \$ 490,880 | \$ 472 | | 2 | \$ 472 | \$ 472.00 | \$ 472.00 |
| E.7.a Spill Response Plan | 2015 | Stormwater Coordinator | | 16 | 0.00789231 | \$ 85,704 | \$ 659 | | 2 | \$ 659 | \$ 659.25 | \$ 659.25 |
| E.7.a Illicit Discharge Education & Training | 2015 | Stormwater Coordinator | | 1 | 0.00048077 | \$ 85,704 | \$ 41 | | 1 | \$ 41 | \$ 41.20 | \$ 41.20 |
| E.7.a Illicit Discharge Education & Training | 2015 | Stormwater Coordinator | | 1 | 0.00423077 | \$ 85,704 | \$ 41 | | 1 | \$ 41 | \$ 41.20 | \$ 41.20 |
| E.7 Sub-Total | | | | | | | \$ 8,468 | | 1 | \$ 8,468 | \$ 23,368 | \$ 23,368 |
| E.7 Sub-Total | | | | | | | \$ 8,468 | | 1 | \$ 8,468 | \$ 23,368 | \$ 23,368 |

| PROGRAM ELEMENT | ANNUAL COSTS | ONE-TIME COSTS | TOTAL COST |
|---|--------------|----------------|------------|
| E.4 PROGRAM MANAGEMENT ELEMENT | \$ - | \$ - | \$ - |
| E.5 PUBLIC OUTREACH AND EDUCATION PROGRAM | \$ 1,688 | \$ 6,128 | \$ 7,818 |
| E.6 PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM | \$ 1,648 | \$ 18,542 | \$ 20,190 |
| E.7 ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM | \$ 824 | \$ 824 | \$ 1,648 |
| E.8 CONSTRUCTION SITE STORM WATER RUNOFF CONTROL PROGRAM | \$ 23,368 | \$ 4,098 | \$ 27,466 |
| E.9 POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR PERMITTEE OPERATIONS PROGRAM | \$ 7,033 | \$ 742 | \$ 7,775 |
| E.10 TRASH REDUCTION PROGRAM | \$ 25,626 | \$ 2,266 | \$ 27,892 |
| E.11 INDUSTRIAL/COMMERCIAL FACILITY RUNOFF CONTROL PROGRAM | \$ 7,211 | \$ 2,307 | \$ 9,518 |
| E.12 POST CONSTRUCTION STORM WATER MANAGEMENT PROGRAM | \$ 7,211 | \$ 2,307 | \$ 9,518 |
| E.13 RECEIVING WATER MONITORING | \$ - | \$ - | \$ - |
| E.14 PROGRAM EFFECTIVENESS ASSESSMENT AND IMPROVEMENT | \$ - | \$ - | \$ - |
| E.15 TOTAL MAXIMUM DAILY LOADS COMPLIANCE REQUIREMENTS | \$ 37,591 | \$ - | \$ 37,591 |
| E.16 ONLINE ANNUAL REPORTING PROGRAM | \$ 3,296 | \$ - | \$ 3,296 |
| TOTAL | \$ 115,497 | \$ 37,215 | \$ 152,712 |

MS4 Population (2010) 10,648
 Cost per person per year 10.85