

Attachment B - Flood Control District
OVERVIEW OF MUNICIPAL REGIONAL PERMIT (MRP) COMPONENT HIGHLIGHTS

Provision	Components	Current	Proposed	Implementation Dates	Current Cost	Estimated Cost by Year					Policy Implications
						FY09/10	FY10/11	FY11/12	FY12/13	FY13/14	
C.5	ILLCIT DISCHARGE DETECTION AND ELIMINATION										
		Respond to reports of illicit discharges and conduct enforcement activities. Report to RWQCB.	(1) Legal authority to prohibit and control illicit discharges and escalate stricter enforcement to achieve compliance within 10 days or before next rain event. (2) Develop Enforcement Response Plan defining procedures for responding to illicit discharges, providing for escalating enforcement responses. (3) Develop a database (or "tabular system") to record illicit discharge control activities for tracking and follow-up including data on response times and timeliness of corrective action. (4) Increases oversight of Mobile Sources (i.e. power washing, carpet cleaning). (5) Implement a screening program in above ground check points in the MS4 collection system (storm drains) 1 screening per square mile of urban & suburban jurisdiction area, less open space.	7/1/2009	\$200,000	\$300,000	\$300,000	\$300,000	\$300,000	\$300,000	County role will shift from oversight and assistance to enforcement, punishment, and cleanup. County may need to expand authority to utilize escalating penalties for illicit discharges, and may need to change procedures to require cease and desist. Requires County to regularly patrol for NPDES violations.
					\$200,000	\$300,000	\$300,000	\$300,000	\$300,000	\$300,000	
C.7	PUBLIC INFORMATION AND OUTREACH										
			(1) Two advertising campaigns (trash and pesticides) with pre- and post-campaign surveys of the public. (2) Annually participate in and/or host 6 public outreach events and 2 citizen involvement events. (3) Encourage and support watershed stewardship collaborative efforts of community groups. (4) Annually conduct outreach activities targeted towards school age children.	7/1/2009	\$0	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000	
			Cost Totals		\$0	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000	
C.10	TRASH REDUCTION										
		None	(1) Identify 6 Trash Hot Spots within creeks in the Flood Control District's "jurisdiction" (subject to review/approval by Water Board). Conduct 2 annual trash surveys to monitor trash levels at each Trash Hot Spot. Reduce level of trash impairment at Trash Hot Spots to below 100 pieces of trash within 100 foot assessment reach of creek. (2) Install "Full Trash Capture Devices" (FTCD) which must trap all particles retained by a 5mm (0.2 inch) mesh screen. A minimum of 4 FTCDs must be installed at outfalls into Flood Control channels (2' minimum diameter); although an option of installing 2 trash booms is also provided, it does not appear that this could be completed without environmental impacts that outweigh benefits. Operate and maintain FTCDs. (3) Prepare a plan to entirely eliminate trash impacts on waterways by 2024.	7/1/2010 (Propose Trash Hot Spots) 7/1/2012 (Trash Hot Spots' level of trash impairment must be reduced to below 100 pieces of trash per 100 foot assessment reach.) 7/1/2013 (FTCD Installation Complete) 10/15/2013 (Report on Long Term Plan to Eliminate Trash Impacts)	\$225,000	\$425,000	\$435,000	\$945,000	\$1,035,000	\$685,000	Conceptually inappropriate in that the Flood Control District does not host any land uses that are sources of trash, and is rather the recipient of trash with sources in adjacent jurisdictions. Does not recognize limitations on Flood Control District funding. Does not respect that Flood Control District cannot control sources outside its jurisdiction. Substantial costs to Flood Control District associated with implementing FTCDs; ongoing costs of maintaining FTCDs. Potential increased enforcement. Implicitly encourages Flood Control District to eliminate homeless persons' contribution to trash impacts (i.e. removal of homeless encampments near waterways). Requires development of an unachievably ambitious plan to entirely eliminate trash impacts, which would require activity by the Flood Control District well in excess of what is possible.
			Cost Totals		\$225,000	\$425,000	\$435,000	\$945,000	\$1,035,000	\$685,000	

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C.15	EXEMPTED AND CONDITIONALLY EXEMPTED DISCHARGES										
C.15. b	CONDITIONALLY EXEMPTED DISCHARGES	Non-specific requirements. (*Interim guidance released by the Water Board has established oversight of potable water discharges.)	Sets forth categories of conditionally exempt non-stormwater discharges that may only be allowed if it is ensured that required BMP's and control measures are implemented, including discharges of potable water (requiring oversight of Water Agencies) and emergency discharges (requires over site of Fire District). Requires the Flood Control District to track, monitor, and report these discharge types.	7/1/2010	\$10,000	\$20,000	\$20,000	\$20,000	\$20,000	\$20,000	Requires Flood Control to oversee/regulate discharges by the Fire Districts and Water Agencies, and to subsequently exercise this authority. It may not be possible to recover expenses associated with the requirements of this section.
			Cost Totals		\$0	\$20,000	\$20,000	\$20,000	\$20,000	\$20,000	
TOTAL ESTIMATED MRP COSTS					\$425,000	\$845,000	\$855,000	\$1,365,000	\$1,455,000	\$1,105,000	

NOTES:
 * Note costs listed above as excluded from cost calculations.
 * All future costs estimated in 2009 dollars, with no adjustment for inflation.
 * Capital costs annualized when not specified by implementation dates.
 * Costs are specific to NPDES compliance-related portions of County activities.
 * For provisions where implementation dates are not specified, assume implementation date of July 1, 2009 or upon issuance of permit.
 * Assume for costs near high end of anticipated range.