



CITY of NAPA

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July 20, 2012

VIA EMAIL [COMMENTLETTERS@WATERBOARDS.CA.GOV]

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

Re: Comment Letter – 2nd Draft Phase II Small MS4 General Permit

Dear Ms. Townsend:

The City of Napa ("Napa") appreciates the opportunity to provide these written comments on the 2nd Draft Phase II Small MS4 General Permit ("Draft Permit") and the Draft Fact Sheet for the Draft Permit ("Draft Fact Sheet"). Napa thanks the State Water Resources Control Board ("State Board") for the improvements made in the Draft Permit since the release of the 1st Draft last year. Napa urges the State Board to continue to improve the Draft Permit based on these comments and the other comments submitted by municipal dischargers.

Napa participates in the Napa County Stormwater Pollution Prevention Program ("NCSPPP"), and is a member of both the California Stormwater Quality Association ("CASQA") and the Statewide Stormwater Coalition ("SSC"). Napa joins in and incorporates by this reference the comment letters submitted by NCSPPP, CASQA and SSC. Napa writes separately to address issues unique to Napa's program.

Comments on the Draft Permit

As the State Board is aware, all of the conditions of the final Permit will become legally enforceable requirements for Napa. If there are future legal disputes about the meaning of the conditions in the Permit, a court will review the Permit's terms as it would review any contract or legal document. Napa therefore urges the State Board to listen to the concerns of municipal dischargers, who are essentially the State Board's contractual partner when it comes to the Permit (albeit partners who lack control over the final permit language). The State Board should only include provisions in the Permit that are precise and intended to create enforceable obligations that are well understood by all parties.

Consistent with this general comment, Napa has the following specific comments on the Draft Permit:

1. **Section B.4 (Incidental Runoff):** This section prohibits all runoff from landscaped areas not qualifying as "Incidental Runoff" and also requires controls for Incidental Runoff. In accordance with 40 C.F.R. § 122.26(d)(2)(iv)(B)(1), non-storm water discharges from landscape irrigation, discharges from potable water sources, irrigation water, lawn watering and related categories need only be addressed as illicit discharges where such discharges are identified by the municipalities as sources of pollutants to waters of the United States. Consistent with this regulation, Napa should be allowed to establish, as needed, the conditions under which runoff from landscaped areas is to be prohibited or controlled. The requirement to prohibit or regulate this non-stormwater source should be left to the City. Further, the controls required by section B.4.a-e are not always feasible to achieve. For example, it is not always feasible to detect and correct leaks within 72 hours. In accordance with the applicable regulations, Napa should be free to establish feasible controls if it determines that non-storm water discharges from landscaped areas are a source of pollutants to receiving waters in Napa.

Through its water department, Napa has already put in place a market-based approach to reducing water used for landscaping, thereby helping to achieve the City's conservation and water quality goals. Specifically, Napa's water rates provide financial incentives to reduce water usage. Napa also has provided on-line and smart phone tools to assist water customers to reduce water usage and locate leaks or inefficient watering practices. Through its Conservation Coordinator, Napa offers a host of individualized and general educational tools to lower water usage. In addition, Napa has a "cash for grass" turf replacement rebate program that has been very successful. These market-driven and educational approaches are believed to be more effective than the top-down regulatory approach in the Draft Permit.

2. **Section D (Receiving Water Limitations):** The State Board's receiving water limitations language must be revised to make it consistent with the State Board's stated intent to achieve compliance with water quality standards "over time, through an iterative approach requiring improved BMPs." (State Board Order WQ 2001-15 (interpreting the State Boards' mandatory receiving water limitations language in State Board Order WQ 99-05.) In a case that the United States Supreme Court will review next term, the Ninth Circuit held that, contrary to the State Board's stated intent, the receiving water limitations language requires immediate compliance with numeric water quality standards. To bring the language of the Draft Permit into line with the State Board's policy of achieving compliance over time through the iterative process, the State Board should revise the receiving water limitations language as proposed by CASQA and the SSC in their respective comment letters. Making the receiving water limitations language consistent with State Board Order WQ 2001-15 is important to Napa because the Napa River is subject to tidal influences. Therefore, pollutants in the Napa River may come from upstream or downstream sources. Napa should not be placed in position where it might face potential legal exposure over receiving water conditions it cannot control.

3. Section E.1.a (Continuation of Current Programs): This section allows a Regional Water Board Executive Officer ("EO") to require a Renewal Traditional Small MS4 Permittee to continue implementation of current BMPs and reporting requirements in lieu of implementation of the requirements of the Draft Permit. Rather than making this in lieu provision a unilateral decision of the Regional Board EO, Napa requests that Permittees be permitted to apply to the Regional Board EO to continue current programs in lieu of the Draft Permit. If such an application is made, the Regional Board EO could then make the determination that the Permittee's current program is equally or more effective at reducing pollutants. The Regional Board EO's decision should also be subject to review by the State Board through the Water Code petition process, not just subject to State Board EO review. Finally, the in lieu process should apply to all the provisions in the Draft Permit, including section E.12 and E.13.

This is an issue of vital importance to Napa and was mentioned in the City's comment letter on the 1st Draft of the Permit. Through the NCSPPP, Napa and its partners have invested a significant amount of time and money to develop a stormwater program tailored to local conditions. Napa and its partners have invested in excess of \$600 Million on major projects in the Napa River/Napa Creek that enhance water quality in the Napa River and its tributaries and provide environmentally responsible flood and watershed protection. Napa should have the ability to apply to continue these programs without having to restart them based on the requirements of the Draft Permit. Napa should also have the ability to challenge a Regional Board EO's denial of such a request by filing a petition to the State Board.

4. Section E.7 (Education and Outreach Program): This section provides that Traditional Small MS4 Permittees may be required to implement Community-Based Social Marketing ("CBSM") if the Regional Board EO requires it. Because there is no requirement in the Clean Water Act ("CWA") and implementing regulations to use any particular type of education and outreach, this provision must be deleted. As previously explained in Napa's comment letter on the 1st Draft of the Permit, CBSM is an expensive and time-consuming process that is not the best approach for Napa. Napa should not have to deviate from its current local program and from its procurement processes (which generally do not allow for such a sole-source approach) at the unilateral direction of the Regional Board EO.
5. Section E.11.i (Incorporation of Water Quality and Habitat Enhancement Features in New Flood Management Facilities): This provision requires Napa to "develop and implement a process for incorporating water quality and habitat enhancement features into new and rehabilitated flood management facilities." By the fourth year of the new Permit, Napa would be required to "complete and have available a list of new or upgraded flood management projects, including a summary of water quality and habitat enhancement features incorporated into their design."

This provision is unnecessary and should have no application to Napa. As noted above and in the City's comment letter on the 1st Draft of the Permit, Napa and its partners at NCSPPP have invested in excess of \$600 Million on the Napa River/Napa Creek Flood Protection Project and numerous other local watershed enhancement efforts. To burden Napa with the additional requirements of section E.11.i of the Draft Permit is unreasonable in light of the efforts Napa has already taken.

6. **Section E.12 (Post Construction Storm Water Management Program):** Section E.12 of the Draft Permit establishes post construction requirements for new and redevelopment projects. Required measures include, without limitation, site design measures (E.12.6), low impact development runoff standards (E.12.d) and hydromodification management (E.12.c). When applied to Napa, these "one-size-fits-all" requirements will significantly undermine Napa's long-standing and highly successful urban growth management approach and the significant water quality benefits that flow from that approach.

In 1973, the voters in Napa established the basis for what has become the City's Rural Urban Limit Line ("RUL"), an urban growth boundary identifying a limited area subject to urban development. The RUL has remained in place, virtually unchanged, for over 20 years, and the City's current general plan retains the RUL for the next 25 years. The RUL results in significant water quality benefits by preventing development of impervious surfaces in rural areas and channeling urban growth to infill and redevelopment areas within the urban boundary, the type of "smart growth" principles that section E.12.j of the Draft Permit claims to promote.

However, the volume and flow criteria in section E.12 of the Draft Permit will prevent Napa from achieving and preserving the goals of the RUL. A key part of the RUL is the policy to "provide for the efficient development and redevelopment of land within the RUL in order to allow job and housing growth through the end of the planning period." In other words, to prevent sprawl, the City must allow infill and redevelopment projects to reasonably occur within the constraints of such sites. Section E.12's requirements do not accommodate the realities of infill and redevelopment projects because achieving the volume and flow criteria demand more land than such projects have available. The limited exceptions found in the Draft Permit in section E.12.d.2.(ii).(3).C and elsewhere are too vague and limited to provide effective relief. As currently written, the Draft Permit will place Napa in the untenable position of continuing its "smart growth" plan without all the necessary tools to allow for "the efficient development and redevelopment of land within the RUL"

In order to allow Napa to continue to implement the RUL and achieve the associated water quality benefits of this "smart growth" land use approach, Napa requests a specific exemption from the requirements of section E.12. The Draft Permit should include an exemption that applies when dischargers have adopted

and consistently applied an urban growth management boundary such as the RUL.

7. **Section E.13.c (Special Studies)**: This section allows Permittees to develop and implement a special study monitoring program, with approval of the Regional Board EO, in lieu of regional or receiving water monitoring. Napa believes that the Draft Permit's monitoring requirements as a whole are excessive and not required by the CWA and its implementing regulations. At a minimum, section E.13.c should be amended to allow ongoing monitoring efforts for existing flood control, habitat enhancement and stream restoration projects to qualify as special studies.
8. **Section E.16.c (Regional Programs and Reporting)**: This section provides that only one annual report may be submitted on behalf of Permittees involved in a Regional Program. As noted above, Napa participates in the NCSPPP. While part of NCSPPP, Napa administers its own stormwater program and is separately enrolled under the Permit. The State Board should consider providing more flexibility in how programs such as Napa's that are independent but coordinate with regional partners report on their efforts.

Comments on the Draft Fact Sheet

The Draft Fact Sheet must satisfy the requirements of 40 C.F.R. sections 124.86(a) and 124.56. In addition to the deficiencies in the Draft Fact Sheet pointed out in the SSC comment letter, Napa submits the following two key comments on the Draft Fact Sheet.

1. **Section III – Economic Considerations**: The State Board in Order WQ 2000-11 acknowledged that the cost of compliance is a relevant factor in determining MEP. To remain consistent with MEP, the BMPs imposed in the Draft Permit should be shown to "have a cost that bears a reasonable relationship to the pollution control benefits to be achieved."

Attached to this comment letter is an estimate of the costs to Napa to implement the controls in the Draft Permit. Rather than relying on outdated studies of Phase I program costs, the State Board should conduct a true cost assessment of the controls required by the Draft Permit. The State Board should then assess these costs in light of actual estimates of the pollutant control benefits to be achieved by each control. Such an assessment is consistent with the cost considerations that are an inherent part of MEP. Since the State Board in section E.14.9.(ii).(a).(4) of the Draft Permit expects Permittees to assess the "pollutant source reductions achieved by individual BMPs," this is an effort that the State Board must believe it can perform.

2. **Section IV (Unfunded Mandates)**: Napa contends that the new programs and higher levels of service in the Draft Permit constitute unfunded state mandates, for all the reasons expressed in the SSC letter. Rather than imposing these unfunded state mandates on cash-strapped local jurisdictions, the State Board

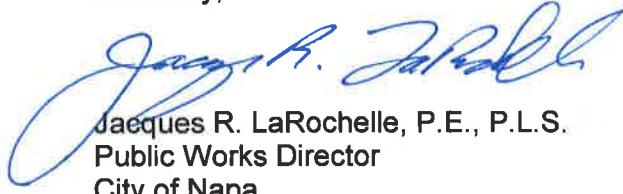
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should implement the 6 minimum control measures consistent with EPA's Phase II regulations.

Conclusion

For the reasons expressed in this written comment letter and in the NCSWPPP, CASQA and SSC letters, Napa asks the State Board to revise the Draft Permit and Draft Fact Sheet.

Sincerely,



Jacques R. LaRochelle, P.E., P.L.S.
Public Works Director
City of Napa

Enclosure: Napa's Implementation Cost Estimate Summary

cc w/enclosure:

State Senator Noreen Evans
State Senator Lois Wolk
State Assembly Member Mariko Yamada
State Assembly Member 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

ATTACHMENT C - DETAILED COST ESTIMATE SUMMARY

**City of Napa - PHASE II PERMIT
IMPLEMENTATION COST ESTIMATE
SUMMARY**

		ONE TIME COST BY YEAR						
		2012 - 13	2013 -14	2014 -15	2015 -16	2016 -17		
\$	309,395.84	\$	37,962.98	\$	41,584.76	\$	\$	28,869.93

		COST BY YEAR						
		YEAR	2012 - 13	2013 -14	2014 -15	2015 -16	2016 -17	
Base Costs	\$	2,977,968.76	\$	2,977,968.76	\$	2,977,968.76	\$	2,977,968.76
One Time Costs	\$	309,395.84	\$	37,962.98	\$	41,584.76	\$	-
Total Cost	\$	3,287,364.60	\$	3,015,931.74	\$	3,019,553.52	\$	2,977,968.76
Est Population		77,867		78,256		78,648		79,041
Cost per resident	\$	42.22	\$	38.54	\$	38.39	\$	37.68
Cost per household	\$	107.23	\$	97.89	\$	97.52	\$	96.14

AVERAGE ANNUAL COST FOR 5 YEARS	
Total Annual Avg Cost for 5 Years	\$ 3,061,531
5 Year Avg Population	78,650
Avg Cost per Resident	\$ 38.93
Avg. Cost per Household	\$ 98.87

Residents per household

2.54

PROGRAM ELEMENT	ANNUAL COSTS	ONE-TIME COSTS	TOTAL COST
E.6 PROGRAM MANAGEMENT ELEMENT	\$ 23,096	\$ 211,690	\$ 234,785
E.7 OUTREACH AND EDUCATION PROGRAM	\$ 303,939	\$ 6,854	\$ 310,793
E.8 PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM	\$ 12,715	\$ -	\$ 12,715
E.9 ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM	\$ 374,981	\$ 20,269	\$ 395,250
E.10 CONSTRUCTION SITE STORM WATER RUNOFF CONTROL PROGRAM	\$ 167,879	\$ -	\$ 167,879
E.11 POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR PERMITTEE OPERATIONS PROGRAM	\$ 1,095,331	\$ 43,305	\$ 1,138,636
E.12 POST CONSTRUCTION STORM WATER MANAGEMENT PROGRAM	\$ 619,455	\$ 83,876	\$ 703,331
E.13 WATER QUALITY MONITORING	\$ 152,998	\$ 46,192	\$ 199,189
E.14 PROGRAM EFFECTIVENESS ASSESSMENT	\$ 112,221	\$ 19,016	\$ 131,237
E.15 TOTAL MAXIMUM DAILY LOADS COMPLIANCE REQUIREMENTS	\$ 55,354	\$ -	\$ 55,354
TOTAL	\$ 2,917,969	\$ 431,202	\$ 3,349,171

Other annual costs - permit fees, vehicles, office supply etc.
Vactor Truck-rental-\$1600 p/month

PROGRAM ELEMENT	TOTAL COSTS	STAFF COSTS	OTHER COSTS
E.6 PROGRAM MANAGEMENT ELEMENT	\$ 234,785	\$ 264,052	\$ -
E.7 PUBLIC OUTREACH AND EDUCATION PROGRAM	\$ 310,793	\$ 310,793	\$ -
E.8 PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM	\$ 12,715	\$ 12,715	\$ -
E.9 ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM	\$ 395,250	\$ 282,872	\$ 112,378
E.10 CONSTRUCTION SITE STORM WATER RUNOFF CONTROL PROGRAM	\$ 167,879	\$ 167,879	\$ -
E.11 POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR PERMITTEE OPERATIONS PROGRAM	\$ 1,138,636	\$ 1,124,305	\$ 18,000
E.12 POST CONSTRUCTION STORM WATER MANAGEMENT PROGRAM	\$ 703,331	\$ 703,331	\$ -
E.13 WATER QUALITY MONITORING	\$ 199,189	\$ 199,189	\$ -
E.14 PROGRAM EFFECTIVENESS ASSESSMENT	\$ 131,237	\$ 131,237	\$ -
E.15 TOTAL MAXIMUM DAILY LOADS COMPLIANCE REQUIREMENTS	\$ 55,354	\$ 55,354	\$ -
TOTAL	\$ 3,349,171	\$ 3,251,729	\$ 130,378

CITY OF NAPA - PHASE II PERMIT IMPLEMENTATION COST ESTIMATE

Permit Element (May 14, 2013 Draft)										One-Time Cost Schedule							
										2013	2014	2015	2016	2017			
PROGRAM MANAGEMENT ELEMENT										PROGRAM MANAGEMENT ELEMENT							
E.6	Legal Authority (update or create ordinance)	2014	Staff	Hours per hour per team	FTE	Staffing Costs	Other Costs (consultants, equipment, lab and travel)	Annual Cost(s) Year = 1 Year = 2	Total Cost	One-Time Costs	2013	2014	2015	2016	2017	One Time FTE	
E.6.a	Certification	2013	Deputy PW Director	2	104	0.056 \$ 208,270	\$ 10,14	\$ 10,313.51	\$ 10,313.51	\$ 10,313.51	\$ 0.050	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.375	
E.6.b	Enforcement Measures and Tracking	2014	Liquid PPN Director	15	783	0.005 \$ 25,246	\$ 35,45	\$ 55,154.75	\$ 55,154.75	\$ 55,154.75	\$ 0.375	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.000	
E.6.c	Enforcement Response Plan	2015	Engineering Assistant	10	520	0.056 \$ 115,480	\$ 29,870	\$ 28,865.93	\$ 28,865.93	\$ 28,865.93	\$ 0.250	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.000	
E.6.d	Enforcement Training System	2015	Engineering Assistant	3	156	0.075 \$ 115,080	\$ 8,481	\$ 14,424.95	\$ 14,424.95	\$ 14,424.95	\$ 0.125	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.000	
E.6.e	Enforcement Response Plan Review	2015+	Engineering Assistant	3	156	0.005 \$ 115,080	\$ 264,061.86	\$ 264,061.86	\$ 264,061.86	\$ 264,061.86	\$ 264,061.86	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	1.500
E.7 Sub-total EDUCATION AND OUTREACH PROGRAM																	
E.7.f	Select outreach option. If regional program, describe																
	Counseling and Implement comprehensive educational and enforcement programs	2013	Associate Engineer	2	104	0.050 \$ 137,080	\$ 6,854	\$ 6,854.46	\$ 6,854.46	\$ 6,854.46	\$ 0.050	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.125	
	public input in emergency development	2013	Engineering Assistant	5	285	0.125 \$ 115,860	\$ 14,425	\$ 14,424.95	\$ 14,424.95	\$ 14,424.95	\$ 0.250	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.500	
	answers to every 5 years	2014, 2016	Engineering Assistant	200	520	0.250 \$ 115,860	\$ 28,870	\$ 28,869.93	\$ 28,869.93	\$ 28,869.93	\$ 0.250	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.125	
	existing anti-tamper alarm water mainlines in multiple languages	2015+	Engineering Assistant	5	260	0.250 \$ 115,860	\$ 14,425	\$ 14,424.95	\$ 14,424.95	\$ 14,424.95	\$ 0.125	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.050	
	water efficiency and storm water/leak detection	2013	Engineering Assistant	2	104	0.050 \$ 115,860	\$ 5,774	\$ 5,773.89	\$ 5,773.89	\$ 5,773.89	\$ 0.050	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.125	
	alarm discharge and resulting proper application of pesticides, herbicides, and fertilizers	2014+	Engineering Assistant	2	104	0.050 \$ 115,860	\$ 14,425	\$ 14,424.95	\$ 14,424.95	\$ 14,424.95	\$ 0.125	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.050	
	storm water education to schools, local organizations, car washes, mobile irrigation, washing and irrigation	2015+	Engineering Assistant	2	104	0.050 \$ 115,860	\$ 5,774	\$ 5,773.89	\$ 5,773.89	\$ 5,773.89	\$ 0.050	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.050	
	Annual outreach report (years 3, 4 and 5)	2015+	Engineering Assistant	2	104	0.050 \$ 137,080	\$ 6,854	\$ 6,854.46	\$ 6,854.46	\$ 6,854.46	\$ 0.050	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.050	
	Year 5 report include changes in public awareness and knowledge and suggested program changes	2017	Senior Civil Engineer	2	104	0.050 \$ 162,154	\$ 8,016	\$ 8,017.70	\$ 8,017.70	\$ 8,017.70	\$ 0.050	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.050	
E.7.b	Staff and Site Chornd Training and Education																
E.7.b.1	Illicit Discharge Detection and Elimination Training	2015+	Engineering Assistant	2	130	0.050 \$ 115,860	\$ 7,217	\$ 7,217.48	\$ 7,217.48	\$ 7,217.48	\$ 0.063	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.050	
	Permittee staff training with annual assessments	2015+	Engineering Assistant	2	130	0.005 \$ 115,860	\$ 8,861	\$ 8,860.98	\$ 8,860.98	\$ 8,860.98	\$ 0.063	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.050	
E.7.b.2	Construction Outreach and Education	2014+	Engineering Assistant	4	208	0.100 \$ 115,860	\$ 11,545	\$ 11,545.97	\$ 11,545.97	\$ 11,545.97	\$ 0.100	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.150	
	Permittee Staff Training - Annually	2014+	Engineering Assistant	6	312	0.150 \$ 115,860	\$ 17,222	\$ 17,321.96	\$ 17,321.96	\$ 17,321.96	\$ 0.150	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.150	
	plan: reviewers and permitting staff trained and updated annually	2014+	Engineering Assistant	1	76	0.030 \$ 115,860	\$ 4,320	\$ 4,320.48	\$ 4,320.48	\$ 4,320.48	\$ 0.038	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.038	
	third party plan reviewers, permitting staff and inspectors trained	2015+	Engineering Assistant	0	0	0.000 \$ 115,860	\$ 17,560	\$ 17,559.84	\$ 17,559.84	\$ 17,559.84	\$ 0.075	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.125	
	b. Construction Site Operator Education	2015	Engineering Assistant	7	104	0.050 \$ 115,860	\$ 14,435	\$ 14,434.98	\$ 14,434.98	\$ 14,434.98	\$ 0.050	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.050	
	development and construction materials annually	2014+	Engineering Assistant	2	104	0.050 \$ 115,860	\$ 7,217	\$ 7,217.48	\$ 7,217.48	\$ 7,217.48	\$ 0.063	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.063	
	Implementation must be utilized before due date of CDR's	2014+	Engineering Assistant	0	0	0.000 \$ 115,860	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0.063	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.063	
	annual assessment of staff training	2014	Engineering Assistant	2	104	0.050 \$ 115,860	\$ 5,774	\$ 5,773.98	\$ 5,773.98	\$ 5,773.98	\$ 0.063	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.063	
	contractors contractually required to comply with BWP's	2014	Engineering Assistant	2	104	0.050 \$ 115,860	\$ 5,774	\$ 5,773.98	\$ 5,773.98	\$ 5,773.98	\$ 0.063	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.063	
	provide oversight of contractors	2014	Engineering Assistant	2	104	0.050 \$ 117,068	\$ 2,927	\$ 2,926.64	\$ 2,926.64	\$ 2,926.64	\$ 0.063	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.063	
	report on oversight and performance training and assessment results	2014	Engineering Assistant	2	104	0.050 \$ 115,860	\$ 3,010.54	\$ 3,010.54	\$ 3,010.54	\$ 3,010.54	\$ 3,010.54	\$ 0.063	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.063
E.7 Sub-total PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM																	
E.7.f	Develop strategy and implement	2014+	Senior Civil Engineering Assistant	1	52	0.020 \$ 162,154	\$ 4,054	\$ 4,053.65	\$ 4,053.65	\$ 4,053.65	\$ 0.025	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.025	
	use citizen advisory committee (optional)	2014	Engineering Assistant	1	52	0.020 \$ 15,860	\$ 2,987	\$ 2,986.98	\$ 2,986.98	\$ 2,986.98	\$ 0.025	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.025	
	active, engage in R/WMP	2015+	Engineering Assistant	1	52	0.020 \$ 15,860	\$ 2,987	\$ 2,986.98	\$ 2,986.98	\$ 2,986.98	\$ 0.025	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.025	
	annual events (e.g. Cleanwash etc + initial)	2015+	Engineering Assistant	1	52	0.020 \$ 162,154	\$ 12,143.63	\$ 12,143.63	\$ 12,143.63	\$ 12,143.63	\$ 12,143.63	\$ 0.025	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.025
E.8 Sub-total ILICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM																	
E.8.a	Crabbing	2014+	Engineering Assistant	10	520	0.035 \$ 115,860	\$ 28,870	\$ 28,869.93	\$ 28,869.93	\$ 28,869.93	\$ 0.250	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.250	
	Chart and maintain accurate rainfall map	2014+	Engineering Assistant	10	520	0.000 \$ 115,860	\$ 0	\$ 28,869.93	\$ 28,869.93	\$ 28,869.93	\$ 0.250	\$ 0.000	\$ 0.000	\$ 0.000	\$ 0.000	0.250	

CITY OF Napa - PHASE II PERMIT IMPLEMENTATION COST ESTIMATE

PERMIT FULFILLMENT (May 15, 2013 Draft)	PERMIT COMPLIANCE YEAR (SPECIFY DATE IN MAY 15TH UNTILS OTHERWISE NOTED)	STAFF LEVEL	STAFF HOURS PER WEEK	FTE	\$/FTE	STAFFING COSTS	OTHER COSTS (consultants, equipment, etc. w/o)	ANNUAL COSTS (Year = 1 to > 2)	TOTAL COST	ANNUAL COST*	CHP TIME COSTS	One Time Costs	
												FTE	
E. 8.b	photos of outlets required outlet change areas and map locations in drainage areas identifying water bodies identifying gravity areas			0	\$0.000	\$							0.000
	history of SSOs or cases of illegal discharges history of illicit discharges history of illegal dumping, dumping, average disposal / treatment upstream of sanitary sewer facilities outlet change to allow direct discharge to stream			0	\$0.000	\$							0.000
	outlet sampling station locations	2014+		Inspector	\$	260	0.000	\$					0.000
	Urbanized area in eastern Napa County (City of Napa, Sonoma County, Marin County)	2014+		Engineering Assistant	\$	208	0.000	\$					0.000
	Maximum facility areas include vehicle storage yards metal and other recycled materials collection facilities waste transfer facilities	2014+		Engineering Assistant	\$	320	0.000	\$					0.500
	vehicle mechanical repair, maintenance and cleaning building lease, water fixtures or components, maintenance and cleaning materials and chemicals building materials dealers and strange plastic manufacturers others as determined by MSA or FHCCB			Engineering Assistant	\$	0.000	\$						0.000
	Facility inventory information must include facility name, address, # address, address of business activity, indicator parameter and GIS (geospatial)			Engineering Assistant	\$	0.000	\$						0.000
E. 8.c	Annual Submit inventory in report Field Sampling to Detect Illicit Discharges Sample any outfall with conducting E. 8.a (City of Napa 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 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718, 719, 719, 720, 720, 721, 721, 722, 722, 723, 723, 724, 724, 725, 725, 726, 726, 727, 727, 728, 728, 729, 729, 730, 730, 731, 731, 732, 732, 733, 733, 734, 734, 735, 735, 736, 736, 737, 737, 738, 738, 739, 739, 740, 740, 741, 741, 742, 742, 743, 743, 744, 744, 745, 745, 746, 746, 747, 747, 748, 748, 749, 749, 750, 750, 751, 751, 752, 752, 753, 753, 754, 754, 755, 755, 756, 756, 757, 757, 758, 758, 759, 759, 760, 760, 761, 761, 762, 762, 763, 763, 764, 764, 765, 765, 766, 766, 767, 767, 768, 768, 769, 769, 770, 770, 771, 771, 772, 772, 773, 773, 774, 774, 775, 775, 776, 776, 777, 777, 778, 778, 779, 779, 780, 780, 781, 781, 782, 782, 783, 783, 784, 784, 785, 785, 786, 786, 787, 787, 788, 788, 789, 789, 790, 790, 791, 791, 792, 792, 793, 793, 794, 794, 795, 795, 796, 796, 797, 797, 798, 798, 799, 799, 800, 800, 801, 801, 802, 802, 803, 803, 804, 804, 805, 805, 806, 806, 807, 807, 808, 808, 809, 809, 810, 810, 811, 811, 812, 812, 813, 813, 814, 814, 815, 815, 816, 816, 817, 817, 818, 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1181, 1182, 1182, 1183, 1183, 1184, 1184, 1185, 1185, 1186, 1186, 1187, 1187, 1188, 1188, 1189, 1189, 1190, 1190, 1191, 1191, 1192, 1192, 1193, 1193, 1194, 1194, 1195, 1195, 1196, 1196, 1197, 1197, 1198, 1198, 1199, 1199, 1200, 1200, 1201, 1201, 1202, 1202, 1203, 1203, 1204, 1204, 1205, 1205, 1206, 1206, 1207, 1207, 1208, 1208, 1209, 1209, 1210, 1210, 1211, 1211, 1212, 1212, 1213, 1213, 1214, 1214, 1215, 1215, 1216, 1216, 1217, 1217, 1218, 1218, 1219, 1219, 1220, 1220, 1221, 1221, 1222, 1222, 1223, 1223, 1224, 1224, 1225, 1225, 1226, 1226, 1227, 1227, 1228, 1228, 1229, 1229, 1230, 1230, 1231, 1231, 1232, 1232, 1233, 1233, 1234, 1234, 1235, 1235, 1236, 1236, 1237, 1237, 1238, 1238, 1239, 1239, 1240, 1240, 1241, 1241, 1242, 1242, 1243, 1243, 1244, 1244, 1245, 1245, 1246, 1246, 1247, 1247, 1248, 1248, 1249, 1												

TY OF Napa - PHASE II PERMIT IMPLEMENTATION COST ESTIMATE

CITY OF Napa - PHASE II PERMIT IMPLEMENTATION COST ESTIMATE

CITY OF Napa - PHASE II PERMIT IMPLEMENTATION COST ESTIMATE

CITY OF NAPA - PHASE II PERMIT IMPLEMENTATION COST ESTIMATE

One Time Cost Schedule				One Time FTE
	2014	2015	2016	2017
1	\$ -	\$ -	\$ -	\$ -
2	\$ 205,000.00	\$ 37,500.00	\$ 41,666.67	\$ 37,500.00
3	\$ 205,000.00	\$ 37,500.00	\$ 41,666.67	\$ 37,500.00

PERMIT REQUIREMENT (May 1st - April 1st)	STAFF HOURS PER WEEK	#PTP	SHIPPING COSTS	OTHER COSTS (formalwear, equipment, etc.)	ANNUAL COST Year = 1 Mo = 2	TOTAL COST	ANNUAL COST	ONE TIME COST
Comply with Clean Water Act Standards 2004-2006 E. 15 & E. 16 E. 15 & E. 16 Total	2013	Sister Club Engineer	7	10.4 0.0000	\$ 182,154 \$ 82,500.00	\$ 8,108 -	\$ 198,762.00 -	\$ 45,102,773 \$ 45,102,773
	TOTAL	27.388	\$	5,395,712.87	\$	\$	\$ 3,360,716.87	\$ 3,360,716.87