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Chambolle-Musigny, France
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Patzcuaro, Mexico

July 20, 2012

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



Subject: Comment Letter – Second Draft 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 Second Draft 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 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. In order to comply with the draft Permit the City will be required to increase the annual budget to between \$48,427 and \$228,437. Given the City's current population of 10,648 this would result in an average annual program cost of \$35.40 per household (based on 2.15 persons per household). This amount exceeds estimated average annual cost as suggested on page 11 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.

One idea the City of Sonoma would like to offer to help with costs would be to revise Proposition 218 to allow stormwater taxes to be assessed without voter approval. Because of the ongoing partnerships with other agencies, such as the Sonoma 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 recently received \$115,000 in grant funding from the Sonoma County Water Agency to fund a Low Impact Demonstration project and if the City is required to implement the draft Permit the City will no longer have staff available to manage projects that go above and beyond what the draft Permit requires.

General comments:

Please remove all requirements without a demonstrated water quality nexus.

Please provide more flexibility to support implementation and prioritization of the draft Permit by region or community.

Provide a clear, documented, regulatory path to allow implementation of existing programs.

Establish Phase II program requirements that are within the capacity of the current and anticipated resources of cities and counties or provide the funding necessary for implementation.

Specific comments by section:

Section B: 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 to supervise. 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 D: Please remove the third paragraph of Section XI of the Fact Sheet that refers to the Ninth Circuit's decision in *NRDC vs. County of Los Angeles, et al.* The City of Sonoma feels that if the language is left intact, it will represent a seismic shift in policy, create an inconsistency issue with other permits, and undermine the core of the Water Boards' cooperative partnership with the City of Sonoma relative to stormwater management and the achievement of water quality standards.

Section E.7: 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.7.a.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.7.a.ii.j: 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. If it is not the intent of the draft Permit to have Permittees enter the classroom, please be more specific in how Permittees would present school-aged children the storm water education materials.

Section E.9.a.ii.b: Please do not require that photographs be taken to provide baseline information to track operation and maintenance needs over time. It may seem like a simple task but most outfalls in the City of Sonoma are located on private property and gaining access to private property is timely and expensive. In addition, many of the outfalls may be covered in vegetation (such as blackberries), which would take additional staff time to clear prior to taking the photograph. There are 127 outfalls in the City of Sonoma if each one takes 2 hours to cut the blackberries back and photograph, that would amount to 32 days of staff time to photograph the outfalls.

Section E. 12.j: Please remove the requirement to modify general plans and zoning codes to ensure watershed process protection is fully considered in land planning decisions that impact stormwater management of existing and future development. The City of Sonoma updates its general plan every five years and it takes years to get a general plan update approved. Instead the State Water Board should consider changing the language to state that the Phase II Small MS4 General Permit shall be considered in all general plans and zoning code updates.

Section E13.iii: This section should be removed. It is not clear as to implications of requiring Permittees that discharge to waterbodies listed as impaired on the 303(d) list to consult with the Regional Water Board within six months of the effective date of the permit to access whether monitoring is necessary. The City of Sonoma is not comfortable submitting a Notice of Intent to comply with a permit that is unclear as to the specific requirements as they relate to water quality monitoring.

Section E.14.: 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.

Attachment G: On page 8 of attachment G, please explain why the City of Sonoma has been identified as a Municipality with responsibility for an Urban Creek TMDL when Sonoma Creek has not been identified as an Impaired Water body.

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 Joanne Sanders
Councilmembers Barbose, Brown, Gallian, and Rouse

Linda Kelly, City Manager

City of Sonoma Draft Permit Cost Analysis 2012

PERMIT ELEMENT	PERMIT COMPLIANCE YEAR	STAFF LEVEL	STAFF HOURS PER WEEK	STAFF HOURS PER YEAR	FTE	\$/FTE	STAFFING COSTS	OTHER COSTS (consultants, equipment, lab etc)	ANNUAL COST? Yes = 1 No = 2	TOTAL COST	ANNUAL COST	ONE TIME COST	COST BORNE BY CITY OR DEVELOPER	NOTES
Guidance Document (formally SWMP)		First year	Stormwater		40	0.01923077	\$ 312,000	\$ 6,000		2	\$ 6,000			
E.6 Sub-Total							\$ 6,000			2	\$ 6,000		\$ 6,000.00	City
E.6 PROGRAM MANAGEMENT ELEMENT														
E.6.a	Legal Authority	Second year	Stormwater		8	0.00384615	\$ 87,859	\$ 338		2	\$ 338		\$ 337.92	City
E.6.a	Legal Authority	Second year	Stormwater Coordinator		4	0.00192308	\$ 87,859	\$ 169		2	\$ 169		\$ 168.96	City
E.6.b	Certification	First year	Stormwater Coordinator		12	0.00576923	\$ 87,859	\$ 507		2	\$ 507		\$ 506.88	City
E.6.b	Certification	First year	City Attorney		4	0.00192308	\$ 353,600	\$ 680		2	\$ 680		\$ 680.00	City
E.6.c	Enforcement Measures and Tracking	Third year	Stormwater Coordinator		16	0.00769231	\$ 87,859	\$ 676		2	\$ 676		\$ 675.84	City
E.6.c	Enforcement Measures and Tracking	Third year	City Engr.		4	0.00192308	\$ 312,000	\$ 600		2	\$ 600		\$ 600.00	City
E.6.c	Enforcement Measures and Tracking	Third year +	Stormwater Coordinator		8	0.00384615	\$ 87,859	\$ 338		1	\$ 338	\$ 337.92		
E.6 Sub-Total					56		\$ 15,308	\$ -		2	\$ 3,308	\$ 337.92	\$ 3,307.52	
E.7 EDUCATION AND OUTREACH PROGRAM														
E.7.a	Education and Outreach Program	First year	Stormwater Coordinator		8	0.00384615	\$ 87,859	\$ 338		2	\$ 338		\$ 337.92	City
E.7.a	Education and Outreach Program	Second year +			0	0	\$ -	\$ 25,660		1	\$ 25,660	\$ 25,660.00		City
E.7.a	Education and Outreach Program	Third year			0	0	\$ -	\$ 10,000		2	\$ 10,000		\$ 10,000.00	City
E.7.a	Education and Outreach Program	Second year +			0	0	\$ -	\$ 10,000		1	\$ 10,000	\$ 10,000.00		City
E.7.b.1	Illicit Discharge Detection and Elimination Training	Third year +	Stormwater Coordinator		20	0.00961538	\$ 87,859	\$ 845		1	\$ 845	\$ 844.80		City
E.7.b.2	Construction Outreach and Education	Second year +	Stormwater Coordinator		8	0.00384615	\$ 78,300	\$ 301		1	\$ 301	\$ 301.15		City
E.7.b.2	Construction Outreach and Education	Second year +			0	0	\$ -	\$ 2,000		1	\$ 2,000	\$ 2,000.00		City
E.7.b.2.b	Construction Site Operator Education Pollution Prevention and Good Housekeeping Staff Training	Third year +	Stormwater Coordinator		22	0.01057692	\$ 61,296	\$ 648		1	\$ 648	\$ 648.32		City
E.7.b.3	Training	Second year	Stormwater Coordinator		21	0.01009615	\$ 353,600	\$ 3,570		2	\$ 3,570		\$ 3,570.00	City
E.7 Sub-Total					71		\$ 5,702	\$ 47,660		2	\$ 59,977	\$ 40,130.11	\$ 13,907.92	
E.8 PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM														
E.8.ii	Public Involvement and Participation Program	Second year+			0	#N/A	\$ 17,860			1	\$ 17,860	\$ 17,860.00		City
E.8.ii	Public Involvement and Participation Program	Second year+			0	0		\$ 2,000		1	\$ 1,000	\$ 1,000.00		City
E.8.ii	Public Involvement and Participation Program	Second year+			0	0		\$ 2,000		1	\$ 2,000.00			City
E.8 Sub-Total					0		\$ 17,860	\$ 2,000		2	\$ 18,860	\$ 18,860.00		
E.9 ILLICIT DISCHARGE DETECTION AND ELIMINATION														
E.9.a	Outfall Mapping	Second year	Stormwater Coordinator		7	0.00336538	\$ 87,859	\$ 296		2	\$ 296		\$ 295.68	City
E.9.a	Illicit Discharge Source/Food Facility Inspections	First year +	Stormwater Coordinator					\$ 5,550		1	\$ 5,550	\$ 5,550.00		
E.9.b	Illicit Discharge Source/Facility Inventory	Second year	Stormwater Coordinator		16	0.00769231	\$ 87,859	\$ 676		2	\$ 676		\$ 675.84	City
E.9.b	Illicit Discharge Source/Facility Inventory	Second year +	Stormwater Coordinator		8	0.00384615	\$ 87,859	\$ 338		1	\$ 338	\$ 337.92		City
E.9.c	Field Sampling to detect Illicit Discharge	Second year +	Stormwater Coordinator		16	0.00769231	\$ 87,859	\$ 676		1	\$ 676	\$ 675.84		City

City of Sonoma Draft Permit Cost Analysis 2012

PERMIT ELEMENT	PERMIT COMPLIANCE YEAR	STAFF LEVEL	STAFF HOURS PER WEEK	STAFF HOURS PER YEAR	FTE	\$/FTE	STAFFING COSTS	OTHER COSTS (consultants, equipment, lab etc)	ANNUAL COST? Yes = 1 No = 2	TOTAL COST	ANNUAL COST	ONE TIME COST	COST BORNE BY CITY OR DEVELOPER	NOTES
Guidance Document (formally SWMP)	First year	Stormwater Coordinator		40	0.01923077	\$ 312,000	\$ 6,000		2	\$ 6,000		\$ 6,000.00	City	
E.9.c Field Sampling to detect Illicit Discharge	Second year +	Stormwater Coordinator		1	0.00048077	\$ 87,859	\$ 42		1	\$ 42	\$ 42.24		City	
E.9.c Field Sampling to detect Illicit Discharge	Second year						\$ 43,460		2	\$ 43,460		\$ 43,460.00	City	
E.9.c Field Sampling to detect Illicit Discharge	Second year +						\$ 10,865		1	\$ 10,865	\$10,865.00		City	
E.9.d Illicit Discharge Detection and Elimination Source Investigations and Corrective Actions	First year +	Stormwater Coordinator		8	0.00384615	\$ 87,859	\$ 338		1	\$ 338	\$ 337.92		City	
E.9 Sub-Total				56			\$ 92,410	\$ 9,550		\$ 62,240	\$ 17,809	\$ 44,432		
E.10 CONSTRUCTION SITE STORM WATER RUNOFF CONTROL PROGRAM														
E.10.a Construction Site Inventory	First year +	Stormwater Coordinator		12	0.00576923	\$ 87,859	\$ 507		1	\$ 507	\$ 506.88		Developer	
E.10.b.i Construction Plan Review and Approval Procedures	First year	Stormwater Coordinator		4	0.00192308	\$ 87,859	\$ 169		2	\$ 169		\$ 168.96	Developer	
E.10.b.i Construction Plan Review and Approval Procedures	First year	City Engr. Streets		4	0.00192308	\$ 312,000	\$ 600		2	\$ 600		\$ 600.00	Developer	
E.10.b.ii.a Construction Plan Review and Approval Procedures	First year +	Supervisor		20	0.00961538	\$ 68,268	\$ 656		1	\$ 656	\$ 656.42		Developer	
E.10.b.ii.d Construction Plan Review and Approval Procedures	First year	Stormwater Coordinator		3	0.00144231	\$ 87,859	\$ 127		2	\$ 127		\$ 126.72	Developer	
E.10.c.ii Construction Plan Review and Approval Procedures	First year +	Supervisor		60	0.02884615	\$ 68,268	\$ 1,969		1	\$ 1,969	\$ 1,969.27		Developer	
E.10.c.iii Construction Site Inspection and Enforcement	Second year +	Stormwater Coordinator		12	0.00576923	\$ 68,268	\$ 394		1	\$ 394	\$ 393.85		Developer	
E.10 Sub-Total				115			\$ 4,422	\$ -		\$ 4,422	\$ -	\$ 895.68		
E.11 Pollution Prevention/Good Housekeeping for Permittee Operations Program														
E.11.a Inventory of Permittee-Owned and Operated Facilities	Second year	Stormwater Coordinator		12	0.00576923	\$ 87,859	\$ 507		2	\$ 507		\$ 506.88	City	
E.11.a Inventory of Permittee-Owned and Operated Facilities	Second year +	Stormwater Coordinator		2	0.00096154	\$ 87,859	\$ 84		1	\$ 84	\$ 84.48		City	
E.11.b Map of Permittee-Owned or Operated Facilities	Second year +	Stormwater Coordinator		2	0.00096154	\$ 87,859	\$ 84		1	\$ 84	\$ 84.48		City	
E.11.c Facility Assessment	Third year	Stormwater Coordinator		8	0.00384615	\$ 87,859	\$ 338		2	\$ 338		\$ 337.92	City	
E.11.d Storm Water Pollution Prevention Plans	Fourth year	Stormwater Coordinator		72	0.03461538	\$ 87,859	\$ 3,041		2	\$ 3,041		\$ 3,041.27	City	
E.11.e Inspection, Visual Monitoring and Remedial Action	Fifth year +	Stormwater Coordinator		27	0.01298077	\$ 87,859	\$ 1,140		1	\$ 1,140	\$ 1,140.48		City	
E.11.f Storm Drain System Assessment and Prioritization	Second year	Stormwater Coordinator		4	0.00192308	\$ 87,859	\$ 169		2	\$ 169		\$ 168.96	City	
E.11.f Storm Drain System Assessment and Prioritization	Second year	City Engr. PW		4	0.00192308	\$ 312,000	\$ 600		2	\$ 600		\$ 600.00	City	
E.11.g Maintenance of Storm drain System	Third year	Maintenance Person		320	0.15384615	\$ 61,296	\$ 9,430		2	\$ 9,430		\$ 9,430.15	City	
E.11.g Maintenance of Storm drain System	Third year	Stormwater Coordinator		8	0.00384615	\$ 87,859	\$ 338		2	\$ 338		\$ 337.92	City	
E.11.h Permittee Operatons and Maintenance Activities (O&M)	Third year	Stormwater Coordinator		8	0.00384615	\$ 87,859	\$ 338		2	\$ 338		\$ 337.92	City	
E.11.h Permittee Operatons and Maintenance Activities (O&M)	Third year	Stormwater Coordinator		16	0.00769231	\$ 87,859	\$ 676		2	\$ 676		\$ 675.84	City	
E.11.i Incorporation of Water Quality and Habitat Enhancement Features in New Flood Management Facilities	Third year	City Engr.		2	0.00096154	\$ 312,000	\$ 300		2	\$ 300		\$ 300.00	City	

City of Sonoma Draft Permit Cost Analysis 2012

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Guidance Document (formally SWMP) Incorporation of Water Quality and Habitat Enhancement Features in New Flood Management Facilities E.11.i E.11.j Landscape Design and Maintenance E.11.j Landscape Design and Maintenance E.11.i Landscape Design and Maintenance E11 Sub-Total	First year	Stormwater		40	0.01923077	\$ 312,000	\$ 6,000		2	\$ 6,000		\$ 6,000.00	City	
	Fourth year	Stormwater Coordinator		4	0.00192308	\$ 87,859	\$ 169		2	\$ 169		\$ 168.96	City	
	Second year	Stormwater Coordinator		2	0.00096154	\$ 87,859	\$ 84		2	\$ 84		\$ 84.48	City	
	Second year +	Stormwater Coordinator PW Maintenance Person		2	0.00096154	\$ 87,859	\$ 84		1	\$ 84	\$ 84.48		City	
	Second year			40	0.01923077	\$ 61,296	\$ 1,179		2	\$ 1,179		\$ 1,178.77	City	
E11 Sub-Total				533	0.25625		\$ 18,563	\$ -		\$ 18,563	\$ 1,394	\$ 17,169		

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PERMIT ELEMENT	PERMIT COMPLIANCE YEAR	STAFF LEVEL	STAFF HOURS PER WEEK	STAFF HOURS PER YEAR	FTE	\$/FTE	STAFFING COSTS	OTHER COSTS (consultants, equipment, lab etc)	ANNUAL COST? Yes = 1 No = 2	TOTAL COST	ANNUAL COST	ONE TIME COST	COST BORNE BY CITY OR DEVELOPER	NOTES
Guidance Document (formally SWMP)	First year	Stormwater		40	0.01923077	\$ 312,000	\$ 6,000		2	\$ 6,000		\$ 6,000.00	City	
E.12 POST CONSTRUCTION STORMWATER MANAGEMENT PROGRAM														
E.12.a Post-Construction Treatment Measures	Third year +	Stormwater Coordinator		2	0.00096154	\$ 87,859	\$ 84		1	\$ 84	\$ 84.48		City	
E.12.c Site Design Measures	First year	Coordinator		2	0.00096154	\$ 87,859	\$ 84		2	\$ 84		\$ 84.48	City	
E.12.d.1 Low Impact Development Runoff Standards	Second year	Coordinator		4	0.00192308	\$ 87,859	\$ 169		2	\$ 169		\$ 168.96	City	
E.12.d.1 Low Impact Development Runoff Standards	Second year	City Engr.		4	0.00192308	\$ 312,000	\$ 600		2	\$ 600		\$ 600.00	City	
E.12.d.2 Low Impact Development Standards	Second year	Stormwater Coordinator		4	0.00192308	\$ 87,859	\$ 169		2	\$ 169		\$ 168.96	City	
E.12.d.2 Low Impact Development Standards	Second year	City Engr.		8	0.00384615	\$ 312,000	\$ 1,200		2	\$ 1,200		\$ 1,200.00	City	
E.12.d.2.iii Low Impact Development Standards	Second year +	Stormwater Coordinator		8	0.00384615	\$ 87,859	\$ 338		1	\$ 338	\$ 337.92		City	
E.12.g Operation and Maintenance (O&M) of Post-Construction Storm Water Management Measures	Second year	Stormwater Coordinator		4	0.00192308	\$ 87,859	\$ 169		2	\$ 169		\$ 168.96	City	
E.12.g Operation and Maintenance (O&M) of Post-Construction Storm Water Management Measures	Second year	Stormwater Coordinator		2	0.00096154	\$ 87,859	\$ 84		2	\$ 84		\$ 84.48	City	
E.12.h Post-Construction Best Management Practice Condition Assessment	Third year	Stormwater Coordinator		8	0.00384615	\$ 87,859	\$ 338		2	\$ 338		\$ 337.92	City	
E12.j Planning and Building Document Updates	First year	Planning Director		8	0.00384615	\$ 115,416	\$ 444		2	\$ 444		\$ 443.91	City	
E12.j Planning and Building Document Updates	First year	Building Administrator		8	0.00384615	\$ 115,416	\$ 444		2	\$ 444		\$ 443.91	City	
E12.j Planning and Building Document Updates	First year	Stormwater Coordinator		8	0.00384615	\$ 87,859	\$ 338		2	\$ 338		\$ 337.92	City	
E.12 Sub-Total				70	0.03365385	\$ 4,462	\$	\$ -		\$ 3,680	\$ 422	\$ 3,258		
E.13 Water Quality Monitoring														
E.13.ii TMDL--Sonoma Creek (Sediment, Pathogens, and Urban Creek)	Second Year+	Stormwater Coordinator		0	0	0	\$ 47,260		1	\$ 47,260	\$47,260.00			SEC provided quote
E.13 Sub-Total				0	0	0	\$ 47,260	\$		\$ 47,260	\$ 47,260	\$		

City of Sonoma Draft Permit Cost Analysis 2012

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Guidance Document (formally SWMP)	First year	Stormwater		40	0.01923077	\$ 312,000	\$ 6,000		2	\$ 6,000		\$ 6,000.00	City	
PROGRAM EFFECTIVENESS ASSESSMENT AND IMPROVEMENT														
E.14														
E.14.a	Second year				0	#N/A	\$ 3,264		2	\$ 3,264		\$ 3,264.00		GHD provided quote
E.14.b	Fifth year				0	#N/A	\$ 20,629		2	\$ 20,629		\$ 20,629.00		
E.14.c	Fourth year				0	#N/A	\$ 7,579		2	\$ 7,579		\$ 7,578.80		
E.14.c	Fifth year				0	#N/A	\$ 7,579		2	\$ 7,579		\$ 7,579.00		
E.14.c	Third year				0	#N/A	\$ 7,579		2	\$ 7,579		\$ 7,579.00		
E.14.c	Fourth year				0	#N/A	\$ 7,579		2	\$ 7,579		\$ 7,579.00		
E.14.c	Fifth year				0	#N/A	\$ 7,579		2	\$ 7,579		\$ 7,579.00		
E.14 Sub-Total					0	#N/A	\$ 61,788	\$ -	2	\$ 61,788	\$ -	\$ 61,788		
TOTAL MAXIMUM DAILY LOADS COMPLIANCE REQUIREMENTS														
E.15														
E.15	Second Year+								1	\$ -	\$ -		City	
E.15.d	First year +	Stormwater Coordinator			8	0.00384615	\$ 87,859	\$ 338	1	\$ 338	\$ 337.92			
E.15 Sub-Total						0.00384615	\$ 338	\$ -		\$ 100,021	\$ 338	\$ 99,683		
E.16 ONLINE ANNUAL REPORTING PROGRAM														
E.16	First year +	Stormwater Coordinator			8	0.00384615	\$ 87,859	\$ 338	1	\$ 338	\$ 337.92			
E.16 Sub-Total						0.00384615	\$ 338	\$ -		\$ 338	\$ 338	\$ -		
				TOTAL			\$ 268,113	\$ 59,210		\$ 380,119	\$ 126,551	\$ 244,440		

City of Sonoma Draft Permit Cost Analysis Summary 2011

PROGRAM ELEMENT		FIRST YEAR COSTS	SECOND YEAR COSTS	THIRD YEAR COSTS	FOURTH YEAR COSTS	FIFTH YEAR + COSTS	TOTAL COST (over 5 years)
	GUIDENCE DOCUMENT	\$ 6,000.00					
E.6	PROGRAM MANAGEMENT ELEMENT	\$ 1,187	\$ 507	\$ 1,614	\$ 338	\$ 338	\$ 3,983
E.7	EDUCATION AND OUTREACH PROGRAM	\$ 338	\$ 41,531	\$ 37,454	\$ 27,454	\$ 27,454	\$ 134,232
E.8	PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM		\$ 20,860	\$ 17,860	\$ 20,860	\$ 20,860	\$ 80,440
E.9	ILLICIT DISCHARGE DETECTION AND ELIMINATION	\$ 5,888	\$ 61,903	\$ 6,268	\$ 17,809	\$ 55,719	\$ 147,586
E.10	CONSTRUCTION SITE STORM WATER RUNOFF CONTROL PROGRAM	\$ 4,028	\$ 3,526	\$ 3,526	\$ 3,526	\$ 3,526	\$ 18,134
E.11	POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR PERMITTEE OPERATIONS PROGRAM	\$ -	\$ 3,468	\$ 11,673	\$ 3,464	\$ 1,394	\$ 19,999
E.12	POST CONSTRUCTION STORM WATER MANAGEMENT PROGRAM	\$ 1,310	\$ 2,391	\$ 760	\$ 422	\$ 422	\$ 5,307
E.13	WATER QUALITY MONITORING		\$ 47,260	\$ 47,260	\$ 47,260	\$ 47,260	\$ 189,040
E.14	PROGRAM EFFECTIVENESS ASSESSMENT AND IMPROVEMENT		\$ 3,264	\$ 7,579	\$ 15,158	\$ 35,787	\$ 61,788
E.15	TOTAL MAXIMUM DAILY LOADS COMPLIANCE REQUIREMENTS	\$ 338	\$ 338	\$ 338	\$ 338	\$ 338	\$ 1,690
E.16	ONLINE ANNUAL REPORTING PROGRAM	\$ 338	\$ 338	\$ 338	\$ 338	\$ 338	\$ 1,690
TOTAL		\$ 13,427	\$ 185,387	\$ 134,671	\$ 136,967	\$ 193,437	\$ 663,888

MS4 Population (2010)
Cost per person per year

PROGRAM ELEMENT		FIRST YEAR STAFF TIME	SECOND YEAR STAFF TIME	THIRD YEAR STAFF TIME	FOURTH YEAR STAFF TIME	FIFTH YEAR STAFF TIME	TOTAL STAFF TIME
	GUIDENCE DOCUMENT	40.00					
E.6	PROGRAM MANAGEMENT ELEMENT	16.00	12.00	28.00	8.00	8.00	
E.7	EDUCATION AND OUTREACH PROGRAM	8.00	29.00	50.00	50.00	50.00	
E.8	PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM						25.00
E.9	ILLICIT DISCHARGE DETECTION AND ELIMINATION	8.00	56.00	33.00	40.00	33.00	
E.10	CONSTRUCTION SITE STORM WATER RUNOFF CONTROL PROGRAM	103.06	104.00	104.00	104.00	104.00	
E.11	POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR PERMITTEE OPERATIONS PROGRAM	0.00					
E.12	POST CONSTRUCTION STORM WATER MANAGEMENT PROGRAM		708.00	368.01	80.00	33.00	
E.13	WATER QUALITY MONITORING	18.00	36.00	18.00	10.00	10.00	
E.14	PROGRAM EFFECTIVENESS ASSESSMENT AND IMPROVEMENT						
E.15	TOTAL MAXIMUM DAILY LOADS COMPLIANCE REQUIREMENTS	8.00	8.00	8.00	8.00	8.00	
E.16	ONLINE ANNUAL REPORTING PROGRAM	8.00	8.00	8.00	8.00	8.00	
TOTAL		169.0576923	961	617	308	279	
Days per year		21.13221154	120.125	77.12596154	38.5	34.875	
Days per week		0.406388683	2.310096154	1.483191568	0.740384615	0.670673077	