

July 20, 2012

VIA EMAIL [COMMENTLETTERS@WATERBOARDS.CA.GOV]

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:





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> 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), nonstorm 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 online 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.

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.

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.

- 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 quality 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. <u>Section III – Economic Considerations</u>: 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. <u>Section IV (Unfunded Mandates)</u>: 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 IMPLMENTATION COST ESTIMATE SUMMARY

	0	ONE TIME COST BY YEAR		The state of the s
2012 - 13	2013 -14	2014 -15	2015 -16	2016 -17
309,395.84	\$ 37,962.98	\$ 41,584.76	•	\$ 28,869.93

年 一年 日 一日 日 日 日 日 日 日 日 日 日 日 日 日 日 日 日		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 \$	\$ 2,977,968.76
One Time Costs	\$ 309,395.84	\$ 37,962.98	\$ 41,584.76	€9	\$ 28,869.93
Total Cost	\$ 3,287,364.60	\$ 3,015,931.74 \$	\$ 3,019,553.52	\$ 2,977,968.76 \$	\$ 3,006,838.69
Est Population	77,867	78,256	78,648	79,041	79,436
Cost per resident	\$ 42.22	\$ 38.54	\$ 38.39	\$ 37.68	\$ 37.85
Cost per household	\$ 107.23	\$ 68.76 \$	\$ 97.52	\$ 95.70	\$ 96.14

AVERAGE ANNUAL COST FOR 5 YEARS	IR 5 YEARS	
Total Annual Avg Cost for 5 Years	\$ 3,067	3,061,531
5 Year. Avg Population	3.2	78,650
Avg Cost per Resident	€	38.93
Avg. Cost per Household	<i>S</i>	98.87

Residents per household

2.54

	PROGRAM ELEMENT	ANNO	ANNUAL COSTS ONE-TIME COSTS	ONE-TIME	COSTS		TOTAL COST
E.6	PROGRAM MANAGEMENT ELEMENT	69	23,096	8	211,690	€>	234,785
E.7	OUTREACH AND EDUCATION PROGRAM	€9	303,939	₩	6,854	↔	310,793
Щ. 8.	PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM	€9	12,715	↔	3	↔	12,715
E.9	ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM	↔	374,981	69	20,269	₩	395,250
E.10	CONSTRUCTION SITE STORM WATER RUNOFF CONTROL PROGRAM	↔	167,879	€9	Mi.	69	167,879
E.11	POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR PERMITTEE OPERATIONS PROGRAM	↔	1,095,331	€9	43,305	↔	1,138,636
E.12	POST CONSTRUCTION STORM WATER MANAGEMENT PROGRAM	↔	619,455	€Э	83,876	↔	703,331
E.13	WATER QUALITY MONITORING	€9	152,998	⇔	46,192	↔	199,189
E.14	PROGRAM EFFECTIVENESS ASSESSMENT	69	112,221	€9	19,016	↔	131,237
E.15	TOTAL MAXIMUM DAILY LOADS COMPLIANCE REQUIREMENTS	69	55,354	₩	λ	↔	55,354
	TOTAL	€9	2,917,969	89	431,202	₩	3,349,171

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

60,000.00 ↔

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E.7	PUBLIC OUTREACH AND EDUCATION PROGRAM	↔	310,793	\$ 310,793	9 9	
E.8	PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM	↔	12,715	\$ 12,715	co ea	*
E.9	ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM	↔	395,250	\$ 282,872	2	112,378
E.10	CONSTRUCTION SITE STORM WATER RUNOFF CONTROL PROGRAM	↔	167,879	\$ 167,879	69 O	į
	POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR PERMITTEE OPERATIONS				- 1	
E.11	PROGRAM	↔	1,138,636	\$ 1,124,305	2	18,000
E.12	POST CONSTRUCTION STORM WATER MANAGEMENT PROGRAM	↔	703,331	\$ 703,331	€	1
E.13	WATER QUALITY MONITORING	↔	199,189	\$ 199,189	8	1
E.14	PROGRAM EFFECTIVENESS ASSESSMENT	↔	131,237	\$ 131,237	69	1
E.15	TOTAL MAXIMUM DAILY LOADS COMPLIANCE REQUIREMENTS	↔	55,354	\$ 55,354	4	-
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HERBOT SILEMENT (Hay III, 2012 Dout)	PERSIT COMPLIANCE VILAR GPECIFIC DATE IS MAY 18TH URLESS OTHERMISE NOTED)	STATE LENGT	START OLNS PER WEIN	STAFF HOUSE PER TILAR	E	P.	STAFFING COSTS 6	OTHER COSTS (consultants, equipment, lab etc)	ANNUAL COST?	TOTAL COST	AMMUNI, COST	OME THER COST	2012 2014 2014 2014	ŧ E
# of tables with officer-largers and the state of tables with officers connected # of failure up impossibles # of tables up impossibles				0 0 0	\$ 00000		167.878.37	31	m	70,878,751	767,878,71	74		8 8 8 8
HOLLUTON PREVENTIONISCOO HOUSECEPING FOR PERMITTEE OPERATIONS PROGRAM Inventory of Parmittee-Owned and Operated						_							POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR PERMITTEE OPERATIONS PROGRAM	
Facilities develop and maintain Inventory see the Order for listing of Societies renained	2014	Expressing	10	0 00	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	115 480	E.F.			72,174.82	72,174.82			1 1 8 8
Map of Permitte-owned or Operated Facilities map of facilities relative to the unbanized area storm droining system that serves site:	2014	Engineering Assistant	Ю	9 8 0	00000 0 0000 0 0000	15,480	72			72,174,82	72,174,82			8888
receving water body facility manager control tight conduct components in special manager facility fruit conduct components inspection and identity fruit appear.	2015	Engineering	9	000 0	00000	115,480	43 305			43,304,89	43,304 89			38 8
document comprehensive assessment procedures and insuffice	2016+	Serior Chit Engineer Associate Engineer		8 8	6.128					20,269,26	\$ 20,269,26			5 5
update invertory (and map) with fittle-apdate. Stortmwater Pollution Prevention Plans	2015+	Engineering Assistant Associate	. 90	98	0.125	122				14,434,96	14,434.98			28 3
develop SWPPS for her spots Inspections, Visual Monitoring and Remittal Action	2016	Engineer	9 (g 5	0.000	137.090	34.272			34,272,32	34 272 32			3 88
Hot Spot (combons quarturly visually arrapet het-spots annual annual membershames And-care	2017	Engineering	e con	200	888					5,773 59				888
quartitery hodgest inspection communities and single adominenteer dischariges Non-Hot Spots - one sine in permit terms	7100	Engineering Assistant	ő	0 03	0.000 \$. 95.81	28,		7	28 969		28.969.93	\$ 22,899.53	8 8
Strem Drain System Assessment and Profitzeon implement proceedure to assess and printing	P-100	Engineering	ď	0 4	2 0000 3	115,480	73 88 65		0 0	23 085 94	23 095 94			0 0
pipe and pung retainductive state and pung retaining state and discounted pungance				0000	2 0000				W 40 40 40					3888
prioritize carch basins, update an extrane	2014*	Inspector	R	9000	0.000	117,066				58,532,80	\$ 58,532,80			333
inspeci stom system	20154	Street Maint Worker I Street Meint		2080	1 000 \$	73,382			-	73,391 64				2, 2
clear storm stains/Hydro vac bruck \$1600 pinns label catch bearns	2015+	Worker II Street Mazer Worker I	4 m	280	1 000 5	73,382	89,725	18,000 00		9,173,95	8,173,85			: 5
maintain auntace drainage structures	2015+	Street Merri Worker I Engineering	ą	2080	1 000 3		73.382				73,381,84		10.	2 1
develop proceedure to dispose of vessite measurain	2015+	Assistant Engineering Assistant	10 10	280	0.120 0.120 0.120	115,480 \$	14,435		N #	14,434,96	14,434,96	14 434 98	8 880 89	7 7
Permittee Operations and Maintenance Activities (O&M) develop program to assess ORM activities and	1	Samur Cvil		0	\$ 0000		1 00			02.007.00	8 107 70			3 3
rood (includes curb, gutter and videwalk) and parking for mawtenenace	2013	Engineuring	9	8	0.250		.,		7	28 869 93				3
bridge maintenance		When Maint Sheet Maint	ę.	2080	8				-	89,724,64				9 9
cold weather specializes cold weather specializes cold weather weather the cold way molaterance (mawing ett.)		Warter I	\$ \$	2080	200	72,392	73,392			73,381 64	/3,331,64			T T
permittre sportwind or sanctioned special events		Engineering Assistant	(40)	ğ	2000	115,480 \$	5,774			\$ 577389	5,773.98			3
green wester disposal on streets		Western Maint		OK.	0.125				-	8 173.95	9,173.95			3 8
gridita remandi Aydrami (fundada		Street Natri		2 2	\$ 090	73,382								1 1
inspect (and log) Q&M BM+1 annuily development	本	Engineering Assistant	ğ s	222	0.250 \$	117,088 \$	23.086			23,085,94	29,296,40			3 8
Incorporation of Water Quality and Habitat Enhancement Features in Find Management Facilities				ď	0 000									-
develop and implement process for new and	2015	Seminar CIVII	- 64	ğ	0,000	162 154				B.107.70	8.107.70			ă
Turpoda	2015+	Engineering Assistant	9	380	0.125 \$	115,480	14,435		-	14,434,96		_		-

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3846 MII		-	-														8,666.38 \$	POST CONSTRUCTION STORMWATER MANAGEMENT PROGRAM												-						+				
254																		TRUCTION STORM																						
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																	88	I					_			27														_
Ohe The COST																	43,304 89			_						-				· m	-				-				0 60	
ANNUAL COST	2,886,98	3.141.00	3,141,00	3,141,00	3.141.00	2 886 39	2,886,99		257760				1,834.78	15,705.00	3,141,00	6 282 00	2 886 99			43,304 89	14.434.96	6.854.46			27,417,85		18.215.41	16,215.41				28 889 83			5.773.99	5,773.98	5,773.89	5,77389	8,854.48	8 854 48
TOTAL COST	2,886.39	3,141,00	3,141,00 \$	3,141,00	3,141,00	2,686.99 \$	2 886 99			257760	2 577 80 \$		1,834.78	15,705.00	3,141.00 \$	6,282 00	2,888.99		+::+	43,304 89	14,434.98	8 P.Cd A8	_	27,417.85	27.417.85	8,107,70	16.215.41	18,215,41	5.773.88			28,869,80		577388	5,773.88	5,773.99	88 5773	8,773	8.854.46	6.854.48
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OTHER COSTS (commitments, equipment, last attr)																	18,000,00																							
starring coats	2,887	3,141	3,141	3,141	3,141	2,887	2,687	2,887	2,578	2,578	2 578	2,578	13	15,705	3.141	6202	2.887		29	\$00.05	14.435	4	60° 8	27,418	27.418	8,108	16,215	18,215	5,774	8,854		,	5,774			\$774				1 1
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STAP HOURD PERH WEEK	-	-	F	-	_	*	. 40	#	#	- 1				N.	- 61	- 19				9			4 6	* 4			4	9	n	N							1560			7 11
STAFF	Engineering Assistant Parts, Trees	Fac. Supervisor Parts Trees	Fac. Supervisor Parts, Trees	Fac. Supervisor Parka Trees	Fac. Supervisor	Aprilectors	Assistani	Assistant Park Meint	Worker III Park Maint	Worker III Park Maint	Perk Mahre	Park Maint	Street Maint Worker I	Fac. Supervisor Parks Trees	Fac	Fec.	Engineering Ausistant			Engineering	Engineering	Associate	Senier Chill	Associate	Associate	Senior Civil	Senior Clvd Engineer	Senior Clvd Engineer	Amening	Engineer	Assistant	Assessed Engineering	Engineering	Erginamioo	Engineering	Engineering	Assistant	Associate	Engineer Assessment	Annough Engine
PERMIT COMPLISACE VERA (SPECIFIC DATE IS MAY 16TH UNLESS OTHERWISE NOTEON		2014	2014+	2014+	2014+									2014+	2014+	2014	2014+			2015	2015		2013	2013	2014	F107		2014				2013								
PERMIT ELEMENT (MAy 18, 2012 Court)	Landscape Design and Maintenance	evaluate use of pesticides, narricolas and facilitates	Implement best practices:	education activities for municipal application and abilithums.	sentrape mgmt measures	drought estimate sola	creet microbial communities	native plant use	l.	1041	Chemical applications relative to rain e-partic	prohibiting usage within specified assess	Duivous acrops	disposi of unused characters	systems has been adequated and the	fecant amount of chemical usage	annual (aporting th eunnity and demonstrates reduction in charmost usage	E. 12 MANAGEMENT PROGRAM	For Central Coast MS4s please read E/12 first	complete and maintain inventory of projects subject	Post-construction hydromodification measures complete and maintuin inventory of E. 12.a. (Hygomisathan Mamt)	Permittees within a Phase 1 MS4 brundary with approved Hystumon Plan - complete and have	evaluation summary report	our cosign measures implement new alle design measures (projects that create or replace >2.500 SF improvious area)	Low Impact Development Runcti Stantants Development Runcti Stantants	projects that create or replace >5 000 SF imperstaum	Low Impact Development Standards	adopt and implement elandered	stutes control tequirements	sale design immentate assessment measures and passing	hydromodification management menument	annually report upon each regulated project	pujed numa, admasa	developer phase No description	project area and land minimed	now or rplaced impervious surface	pre and post impervious surface	thelead to strike	source coeffic measures	post-construction freatment systems installed on an
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	TOTAL COST		6.854.46	6,854,46	6.854.46	23.085.94	20 269 26	34 272 32	***	11 547 97	11,547,97	11 547 97	16 215 41	(8)	5,773,99	28 868 93	51 TH	0(0)	#ilfor	8	43,889,60	(#1 f))	5-15-03	5773 99		5,773,89	*	17,136.16	578	14,434.96	14,434,96	7	93		5.6	14,434.96	12,161,56	12,161.56	12 181 58
	ANNUAL COST?	Year 1 No. 2			en u				**	***	**	n	-	**	- Pi			10 10		. 17	10.10	***		** **		****		***	V9. 68	*	*		u		* 15	74	N	un Po	100
	OTHER COSTS A PROPERTY. A LOCATE LA SECTION A	and entro																																					
	STAFFING COSTS.		6,854	8,854	6,854	23 096	20,269	34 272	8	11,548	11 548	11 548	16.215	6	5,774	28,870	7 0	508		* #:	43,900	0.0		577.4	(* vy.	5774	(1)	17,136	(2)(t)	14,435	14,435	3.	5		7001	14,435	12,162	12.162	12 183
	Ę		157.089 \$		137,089	15.480 3		137,085 \$		115,480 1	115,480 \$	115,850 \$	162,154	**	115,480	115,480 \$			(*, *)		117,086	9/8		115,480		115,480		137,085	t sh sh	115,480 \$	115,480 \$				1.05	115,480 \$	162,154		The same
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	STAFF		Associate Engineer Associate	Engineer Associate	Amociate	Engineering	Samor DWI Engineer	Engineer	Frontaine	Assettand	Enghaving	Assistant Serier Cyd	Engineer		Acceptant Legal	Engineering					trapactor			Engineering	3	Amiether		Associate Engineer		Engineering	Yes in last					Engineering	Service Civil Engineer	Engineer Semor Ove	-
ATE	PERMIT COMPLIANCE VEAN (SPECIFIC DATE IS MAY 18TH UNLESS	стнаямизе жотво;								2015	2015	2015	2015		2014	2014					2014			2014		2014		2015		2015	2015		20137777			2013			
薑			em for life of prinject	water quality freatment calculations used	of site compliance measures hydromodification standerrie mad	ent	amneni hydnamadification nêmagement proceedures	plementation of hydromod	ment Board if modified others	Develop or modify enforcement mentalment	sociating dolares	or education and subsects	lementing furnishe criteria	os (O&M) of Poxi- Management Messures	implement O&M Verification Program develop written plan	ulated projects with installed	treatment system and hydro mod control locations	dete(s) installed on of measure (type, size etc)	dates and findings from inspections	mentioned approvale	regulated projects: name of site(scity	nama of neparatible operator	hype of control inspection by peof control inspection inspection findings and results	forcement actions taken if any a detailed list of newly installant autrols (before the west sension)	send to Regional Board send to Vector Control agentry	attime (aport: and findings from importations) of discussion of effectiveness of OAM retrieveness.	Management Practice	struction BMPsdevelop = plan to:	map repartment maintenance condition	administer self-certification program	Drugar annual report	elopment Projects in the	Construction Requirements	Continued Updates and E. 12. (2017) Source	cument Updates	g requioments for perjects construction requirements	dandards and specifications	modify coops standards and specifications (see illering in the Order) modify planning and building requirements language.	(Nee Jurms in the Order!)
CITY OF Napa - PHASE II PERMIT IMPLEMENTATION COST ESTIMATE	PERSON SE EMBINT (Nay, 10, 2012 Com);		O&M responsibily mechanism for life of pritie	water quality treatr	bomorbott	E12 Hydromodification Managem	develop and implement hydrometry proceedings	mnuar report venying im	Based Storm Water Management Work with the Registers Scott if modified only	Develop or modify		develop Inscking report for education and subs	complet strategy for implementing numeric critis	Operations and Maintenance (O&M) of Post- Construction Storm Winter Management Memburs	implement	datebase or table of reg	treatment system and	descripti	dates	Lable of informati				or annually prepare sytems and or		discussion of	Post-Construction Best Condition Assessment	for structural post-cor	3	- Land	Fost Construction Ste	Requirements for Dev Central Coast Region	Central Cosst HS4e	Coorman Update	Planning and Building Do Complete the follo	planning and building requiements for project subject to post-construction requirement	analyze codes, idendards and specification	modify planning and bu	

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One Time Cost Sohedule	900												- la	NG WATER MONITOR																									
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	TOTAL COST	2,886.99		3,427.23	3 427 23	3,427 23	3,427,23	3 427 23	A 107 70				3 427 23			9.9	28 869 93	14 434 96	E	2,886,99	2 886 99	72			11 547 97			_	2 886 39		2.886.89				8 660 88		11,547.87	11.547.97	
	Manual Cost?	10	n	97	*	**	+	en		• •		**		10 10		166.00	14		-	7	47.49	2	**			36		*	9 10			**		9			2	** **	
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	starties coats	2 887	3 427	3 427	3,427	3,427	3,427	3,427	818				3,427				25	14.53		2,887	2.887	385			11,548				2,887		2,887				1989's a		11,548	11,548	
	BATTER BATTER	115,480		137,089	137,089	137 089	137,089	137,089	162 154	20 70	162,154		137,089				15.80	15,480	197	115,480	115.480	115,480	115,480	115,480	115.480 \$	137,088	162 154		88.5	115,480	115,480	115.480	115,480	15.480	215,480	115.480	115,480 \$	115,480 \$	
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	PERSET COMPLIANCE YEAR (APSCHIC DATE IN MAY 15TH UNLESS OTHERMASS NOTED)						,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		2016								2013	2013		2013	2014+							40	2013		2014+				S TONE PHILE	2014+		2013	
		defamiling the following can be indporporated into	natural systems and green infrastructure	infill and reduvelyment	ulicati peduoo	Will sen	streets and mobility	Bustand	Revise polices for approver of general plan updefine and specific glass or toher mester planning documents and zowing to include seeins stretibles	and the same of th	document tradification to codes, regulations and	submit proposal for modifying parlates	document modifications completed to pullines	WHER GLILLY MEDITORIES WELLS interheight to an AGB must comply with Middle aniques by W.A. in a TREU, must consult with Regions i Busset within 6 months requirements requirements	MS4s discharging to 303(c) listed waterbodies must consulf with Regional Board within 8 months to determine motheting requirements Traditional Small listes with population >60,000 (see Attachmeth A) but not discharging to ASBS,	TMOL or 303(d) must do either E.13.a, E.13.b or E.13.a Regional Monitoring	Regional Monthering Codebourbee	Consult with Regional Bound Receiving Water Monitoring		metal permanent manitaring station	annually monitor three storm events for	Bio Assessment Sampling - CursiMant	downstreem chennal cross sections (3 locations)	(grilligman birg) structo obidos	Sections (Section 2 Section 2)	Manage committee	Establish a monitoring fund paid by new development	Reporting	identify are characteristic watering at bottom of a	install permanent montoring station	annually methor three starm events for	Вина	Pyredimids	Occurre	Market	Reporting	Special Success	develop special study plan and submit to RE	
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PETRINT GLENKINT (New 14, 2617 Down);	PERMET COMPLANCE WAY SENDING DATE IS MAY SETH UNCESS OTHERWISE MOTEON	STATE	STAFF HOURS PERO WEEK	STAFF CUINS PER TEAR	E	E.	ATAPPING COSTS	OTHER COSTS (commutants, equipment, lac etc)	Amendal Costra	TOTAL COST	AMBURAL COST	ONE TREE COST
Comply with Clean Waler Act Sactions 303d,308b 5.e. and 314 5.Bub-Total	2013	Senior Chd Engineer	Fe .	101 101	0.050 \$	162,154	5 8,108 8 66,363,36	*		8 6,107,70 \$	\$ 8,107,70 6 58,505,50	
				TOTAL	77, 886		1,261,728.87	136,778.00		8 3,382,786.57	3 2,517,980,78	1 431,202,77