

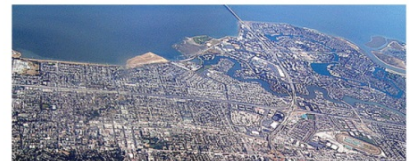
# CURRENT AND FUTURE PROGRAM COST ANALYSIS - DRAFT

City/County Association of  
Governments of  
San Mateo County

San Mateo Countywide Water  
Pollution Prevention Program

April 2014

## Task 1 of the Stormwater Quality Funding Initiative



Project Team:



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## List of Abbreviations

303(d) List	List of impaired waters under Section 303(d) of the federal Clean Water Act
ASBS	Area of Special Biological Significance
BASMAA	Bay Area Stormwater Management Agencies Association
BMP	Best Management Practice
CIP	Capital Improvement Project
FTE	Full Time Equivalent
MRP	Stormwater NPDES Municipal Regional Permit (Order R2-2009-0074)
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
O&M	Operation and Maintenance
PCBs	Polychlorinated Biphenyls
SFEI	San Francisco Estuary Institute
SMCWPPP	San Mateo Countywide Water Pollution Prevention Program
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TMDL	Total Maximum Daily Load
USEPA	United States Environmental Protection Agency
WQAS	Water Quality Attainment Strategy
WQO	Water Quality Objective

# STORMWATER QUALITY FUNDING INITIATIVE

## TASK 1 REPORT:

### CURRENT AND FUTURE PROGRAM COST ANALYSIS

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## 1.0 INTRODUCTION

The City/County Associate of Governments of San Mateo County (C/CAG) implements a number of programs related to transportation and quality of life in the county. One of these programs, the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), focuses on municipal stormwater compliance activities mandated through the Municipal Regional Permit (MRP), issued by the San Francisco Bay Regional Water Quality Control Board (Regional Water Board) under state and federal regulations.<sup>1</sup> These requirements are intended to protect water quality and public health and address known pollutants of concern to water quality, including trash, pesticides, mercury, and polychlorinated biphenyls (PCBs). Under the MRP, each municipality in San Mateo County is a Permittee and responsible for meeting permit mandates. SMCWPPP, although not a Permittee, provides technical assistance to member agencies and performs certain compliance activities on their behalf when countywide or regional efficiencies exist.

Existing expenditures towards stormwater compliance activities by SMCWPPP and its member agencies are assumed to be consistent with meeting MRP requirements. However, it is anticipated that existing dedicated sources of revenue for stormwater permit compliance will be insufficient in the long-term. Of particular concern is that the MRP expires November 30, 2014 and the next version of the permit will likely necessitate a greater level of effort from San Mateo County municipal agencies. C/CAG is therefore considering sponsoring a countywide initiative to generate additional funding for stormwater compliance activities at both the countywide and local levels. Should public opinion indicate potential viability of a funding initiative, C/CAG anticipates placing an initiative before property owners or voters in early 2014, with anticipated annual rates still to be determined (single family homes rates are expected to be in the \$10 to \$35 range). This would enable a potential new revenue stream for SMCWPPP and its member agencies starting in the 2014-15 fiscal year.

In 2013, C/CAG retained a team led by SCI Consulting Group of Fairfield, CA to assist with the funding initiative by investigating additional public financing mechanisms that the municipalities could use to fulfill permit mandates. The elements of that effort are:

- Task 1: Current and Future Program Cost Analysis
- Task 2: Potential Funding Source Analysis and Recommendations
- Task 3: Opinion Research and Survey
- Task 4: Revenue Report and Action Plan
- Task 5: Implementation of Funding Initiative
- Task 6: Public Education and Outreach

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<sup>1</sup>The MRP is issued under the federal National Pollutant Discharge Elimination System (NPDES) program.

Task 1 was implemented by EOA, Inc. of Oakland, CA during the first few months of calendar year 2013. The results of Task 1 are documented in this report. The objectives of Task 1 included collecting and analyzing background and reference information for SMCWPPP and its member agencies (i.e., the Permittees) and using that information to:

1. identify current MRP compliance expenditures and revenues; and
2. project future municipal stormwater permit compliance costs.

It is anticipated that the data provided in this Task 1 report will be used to confirm revenue shortfalls for meeting stormwater permit mandates and justify the need to generate additional funding for stormwater compliance activities at both the countywide and local levels.

## **2.0 CURRENT PERMIT COMPLIANCE COSTS AND REVENUE**

To document readily available information on existing local expenditures and revenues, EOA staff obtained and reviewed available local budget spreadsheets and other pertinent information and performed in-depth interviews with staff from each of SMCWPPP's 22 Permittees. The interviews, which generally ranged from one to three hours in length, include structured discussion of the municipal agency's staffing and methods of implementing the local activities mandated by the MRP. The meetings generally included management-level municipal staff familiar with stormwater program budgeting and cost allocation. A questionnaire was developed to provide a framework for the interviews and is included in Appendix A. The initial section of the questionnaire addressed municipal stormwater program funding and accounting while the remaining sections methodically addressed the level of effort and associated costs for an agency to comply with each provision of the MRP.

The following sections summarize the results of each interview and the review of the supplemental documentation (e.g., budgets) provided by each local agency. In general, each agency's summary is organized in the same order as the questions in the questionnaire. Budget information obtained through this process is summarized and tabulated for each municipality.

Municipalities have different ways of splitting, lumping, and allocating expenses within budget lines and categories. For this reason, costs for specific items or individual program elements, as presented in the tables in the following sections, are not necessarily comparable from municipality to municipality. To the extent possible, the information provided was organized according to specific program elements as defined in the MRP provisions. It should also be noted that in many cases, municipalities absorb the costs of current activities that implement permit requirements using non-stormwater accounts or funds. For example, various MRP provisions require regular municipal staff training. Staff time to attend these training sessions is not, in many cases, charged to a stormwater-specific account.

Throughout this report it was assumed that "local stormwater program" expenditures are defined as costs associated with all activities and efforts related directly to MRP compliance, per the queries in the interview questionnaire. Stormwater drainage system Capital Improvement Projects were assumed to not be MRP compliance costs. Street sweeping is a special case in that it is not required by the MRP but may become increasingly important in helping agencies comply with certain MRP provisions such as control of trash, PCBs, mercury and other pollutants. An itemized annual value for total street sweeping

expenditures was requested from each agency and included when this information was provided<sup>2</sup> and was also included in the sum of total agency expenditures.

## 2.1. Town of Atherton

The Town consists of single-family residential homes and institutional facilities (nine schools, one college, and one country club). There are no commercial facilities in the Town.

The Town of Atherton's stormwater program is implemented as a division of the Public Works Department. Two engineers and one public works supervisor are responsible for implementing stormwater program activities. Street, parks and facility maintenance are contracted out. Planning and building are also contracted out. Public works staff attends SMCWPPP meetings and keeps informed about regional stormwater issues.

Stormwater compliance activities are funded by General Funds (amount used is not known), Measure M<sup>3</sup> (\$80,000 for FY 2012-13) and AB 1546<sup>4</sup> (\$12,700 for FY 12-13). Staff time and expenses pertaining to stormwater permit compliance and stormwater expenses are not tracked. The Town does not assess any property related fee to fund the stormwater program. The Town charges a fee for Plan review; however, there are not separate line items for tracking Provision C.3 (development) or Provision C.6 (construction controls) compliance activities.

The Town's stormwater-related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 100 inlets. The Town does not have any stormwater pumping stations. Municipal staff time spent on municipal operations is not tracked. Activities associated with MRP compliance, including Best Management Practice (BMP) implementation (e.g., street and road repair maintenance, sidewalk/plaza maintenance and pavement washing, bridge and structure maintenance and graffiti removal) are contracted out, and the costs could be determined. Street sweeping is funded through General Funds at a cost of about \$12,000 per year.

Since the Town consists of single-family homes, most post-construction requirements (Provision C.3, development) do not apply. The Town requires all newly developed parcels to include detention basins to minimize erosion and contain runoff on-site.

Requirements to conduct commercial and industrial inspections (Provision C.4) do not apply to the Town. The Town pays the County Health Department \$600/year to inspect school kitchens. Public Works staff responds to illicit discharge issues (Provision C.5) as needed but costs are not

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<sup>2</sup>Agencies were asked to provide their total street sweeping costs rather than attempting to identify an incremental portion for MRP compliance.

<sup>3</sup>Measure M adds \$10 to the fees associated with registering a vehicle in San Mateo County. Allowable uses of Measure M funds received by cities include pavement resurfacing, pothole repair, signs and striping, traffic signals, street sweeping, storm-inlet cleaning and local shuttles. It went into effect in April 2011 and will last for 25 years.

<sup>4</sup>AB 1546 authorizes C/CAG to assess up to \$4 in motor vehicle fees. The purpose of the fee is to establish a pilot program that funds activities to reduce traffic congestion and that provides funding to municipal agencies for stormwater permit compliance in San Mateo County. Since this fee has expired (the timeframe of the fee was 2003 – 2012), any revenue from this source reported by a municipality was not included in that municipality's total dedicated revenue in this report.



tracked. Illicit discharge issues generally relate only to sanitary sewer overflows.

Due to the large size of houses in the Town, construction is often ongoing over a number of years. The Town has up to 500 active construction sites per year. Costs associated with construction site inspections are not tracked (Provision C.6).

Public outreach efforts (Provision C.7) are contracted out. The Planning contractor also implements public outreach activities. Costs associated with public outreach are not tracked. Creek cleanups are not performed because creek access is mainly on private properties.

The Town contracts out pest control work associated with Provision C.9 (pesticide toxicity control). Costs were not available at the time of the interview.

Work associated with Provision C.10 (trash controls) is not tracked.

Requirements within Provision C.13 (copper controls) and C.15 (exempt and conditionally exempt discharges) are generally not applicable to the Town. The Town is not a water purveyor. In addition, the Town does not receive requests for discharging dechlorinated water to the storm drain.

Overall local stormwater program implementation costs are not available. In general, 5% of the Public Works Superintendent's time and 25% of the town engineer's time is spent on stormwater issues. The Town contracted with BKF in FY 2011/12 to update the Town's Grading and Drainage Standard at a cost of \$38,000. The Town is currently in the process of updating the Drainage Master Plan.

The Town currently has one Capital Improvement Project (CIP). This includes repaving areas of structural failure in Atherton channel (side walls and bottom) in FY 2014/15. Previously the Town implemented an environmentally responsible erosion control plan for Atherton Channel, which includes \$10,000/year for biological monitoring and maintenance.

Table 1 provides readily available information on estimated revenues and expenditures for the Town's stormwater program. Overall local stormwater program implementation costs were not available. Information was generally not available to break down expenditures by MRP Provision. Estimates are based on information provided by Town staff.

Table 1. Town of Atherton Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
Dedicated Revenue:						
Measure M <sup>2</sup>				\$80,000		
<b>Subtotal</b>				<b>\$80,000</b>		
Other Revenue:						
General Fund				UA <sup>3</sup>		
AB 1546				\$12,700		
<b>Subtotal</b>						
Expenditures:						
Street Sweeping <sup>4</sup>				\$12,000		
Local Stormwater Program				UA		
<b>Subtotal</b>						

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. Measure M allocation reported by C/CAG. *How much is used for MRP compliance, if any?*
3. UA – Unavailable.
4. Street sweeping funded through general fund.

## 2.2. City of Belmont

The City of Belmont’s stormwater program is implemented by multiple city departments, with the Public Works Department taking the lead. Engineering staff conducts all inspections. The Planning Department is responsible for reviews associated with Provision C.3 requirements. The Parks and Recreation Department is responsible for implementing Provision C.9 requirements.

The stormwater program is funded by a local assessment referred to as the Parcel Tax/NPDES Fee (\$407,726 annually). In addition, \$20,000 per year of Measure M revenues will be available to the stormwater program beginning in FY 2013-14.

The City’s stormwater-related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 1,450 inlets. Costs associated with municipal maintenance activities include an estimated 0.1 Full Time Equivalent (FTE). The annual cost for street sweeping is \$182,000. This is currently funded with monies from AB 1546.

The City’s Engineering staff is responsible for all stormwater-related inspections, i.e., C.3 (post construction BMPs), C.4 (businesses/commercial inspections), and C.6 (construction site inspections). The cost includes an estimated 0.3 FTE. Through an agreement with the City, the San Mateo County Environmental Health Department conducts commercial and industrial inspections (Provision C.4) on the city’s behalf, and charges an inspection fee to businesses to cover costs.

The cost for project reviews associated with post-construction requirements (Provision C.3, development) includes an estimated 0.1 FTE.

Public Works staff responds to illicit discharge issues (Provision C.5) as needed. The cost includes

an estimated 0.05 FTE.

Public outreach efforts (Provision C.7) account for an estimated 0.2 FTE and \$3,000 in direct costs (e.g., promotional materials, brochures).

With regard to Provision C.9 (pesticide toxicity control), the City pays for 20 hours of continued education courses to maintain staff's Qualified Applicator Certificates through the State of California Department of Pesticide Regulation. It costs approximately \$3,600 a year to attend the seminars. This is for nine staff members. The cost for compliance with Provision C.9 includes an estimated 0.05 FTE. Other measurable C.9-related costs are not available.

Work associated with Provision C.10 (trash controls) includes cleaning trash capture devices and hot spots. This effort is estimated at 2.2 FTE.

The City has not dedicated additional time or staff to implement Provision C.13 (copper controls). Architectural copper is not widely used in the City.

Requirements within Provision C.15 (exempt and conditionally exempt discharges) are generally not applicable to the City. The City is not a water purveyor. In addition, the City does not receive requests for discharging dechlorinated water to the storm drain.

The cost for Annual Report preparation (Provision C.16) includes an estimated 0.15 FTE. The cost for overall stormwater program management includes an estimated 0.2 FTE.

Table 2 provides readily available information on estimated revenues and expenditures for the City's stormwater program. Table 3 provides estimated labor and direct costs associated with selected MRP Provisions. All estimates in Tables 2 and 3 are based on information provided by City staff.

Table 2. City of Belmont's Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
Dedicated Revenue:						
Measure M					\$20,000 <sup>2</sup>	
Local Stormwater Assessment <sup>3</sup>					\$407,726 <sup>4</sup>	
<b>Subtotal</b>					<b>\$427,726</b>	
Other Revenue:						
<b>Subtotal</b>						
Expenditures:						
Street Sweeping					\$182,000	
Local Stormwater Program					\$964,346	
<b>Subtotal</b>					<b>\$1,146,346</b>	

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. Portion available for stormwater permit compliance of \$104,574 Measure M allocation reported by C/CAG.
3. A parcel tax referred to as the Parcel Tax/NPDES Fee.
4. FY 2013/14 value from Controller's office with administrative fee deducted.

Table 3. City of Belmont's Estimated Labor and Direct Costs by MRP Provision<sup>1</sup>

Program Element	Estimated FTE	Estimated Direct Costs
C.2 Municipal Operations	0.1	\$143,865
C.3 Post-construction, C.4 IND/COM Site & C.6 Construction Inspections	0.3	\$1,000
C.3 Project Reviews	0.1	
C.5 Illicit Discharge Detection and Elimination	0.05	
C.7 Public Information and Outreach	0.2	\$3,000
C.8 Water Quality Monitoring	NA <sup>3</sup>	NA
C.9. Pesticides Toxicity Control	0.05	\$3,600
C.10 Trash Load Reduction	2.2	
C.11 Mercury Controls	NA	NA
C.12 PCB Controls	NA	NA
C.13 Copper Controls	UA <sup>2</sup>	UA
C.14 PBDEs, Legacy Pesticides and Selenium	NA	NA
C.15 Exempted and Conditionally Exempted Discharges	NA	NA
C.16 Annual Report	0.15	
Overall Program Management	0.2	
<b>TOTAL</b>	<b>3.35</b>	<b>\$151,465</b>

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. UA – Unavailable
3. NA – Not Applicable

## 2.3. City of Brisbane

The City of Brisbane's stormwater program is implemented primarily through the Public Works Department. The new development and construction portions of the stormwater program are implemented through the Planning Department. Staff attends SMCWPPP meetings and keeps informed about regional stormwater issues.

The stormwater program is funded by the local Stormwater Fee, Measure M, the Gas Tax,<sup>5</sup> and the General Fund. The local Stormwater Fee is a local assessment that was established in 1994 to support local stormwater compliance activities and is a parcel tax. The tax rate established in 1994 has not changed since its inception. Efforts related to the stormwater program and permit compliance are tracked as a separate NPDES budget item; however, the budget is not broken down by permit provision.

The City's stormwater-related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 450 inlets. Costs associated with MRP compliance, including BMP implementation (e.g., street and road repair maintenance, sidewalk/plaza maintenance and pavement washing, bridge and structure maintenance and graffiti removal) are not specifically tracked. Work associated with Provision C.10 (trash controls) is implemented by Public Works staff. Costs associated with Provision C.2 and C.10 implementation are estimated to cost 20% of three FTEs (i.e., 0.6 FTE) with an annual estimated cost of \$54,000. Street sweeping costs for recent years range from about \$16,000 to \$22,000.

City staff conducts commercial and industrial inspections (Provision C.4) and respond to illicit discharges (Provision C.5). Costs associated with this effort are considered small and are not tracked. In addition, the City contracts with San Mateo County Environmental Health Department to conduct stormwater inspections at restaurants. Costs associated with the inspections are covered through business license fees. Through an agreement with the City, the San Mateo County Environmental Health Department conducts commercial and industrial inspections (Provision C.4) on the city's behalf, and charges an inspection fee to businesses to cover costs.

Implementation of Provision C.3 (development) and Provision C.6 (construction controls) is mostly implemented by Planning and Public Works staff, respectively. The City collects fees, as part of the grading permit that are intended to address Stormwater Pollution Prevention Plan (SWPPP) compliance. At this time the City does not have many projects that require C.3 implementation. There are currently no installed treatment measures within the City. Inspections and reviews specific to Provision C.3 are estimated to cost 0.05 FTE with an associated annual estimated cost of \$7,200 whereas efforts specific to Provision C.6 are estimated to cost 0.3 FTE with an associated annual estimated cost of \$40,500.

Public outreach efforts (Provision C.7) along with administration of the stormwater program accounts for about 60% of a FTE with an annual cost of \$57,600 and includes coordination with the public, coordinating school-based outreach, and citizen involvement events. Overall management of the stormwater program by public works staff is estimated to cost 25% of an FTE with an annual estimated cost of \$60,000.

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<sup>5</sup>The Gas Tax is State monies received and expended for street or storm drain improvements, repairs, engineering, and administration. Any revenue from this source reported by a municipality was not included in that municipality's total dedicated revenue in this report.

Costs associated with Provision C.9 (pesticide toxicity control) were not available. The City has not dedicated additional time or staff to implement Provision C.13 (copper controls).

Brisbane is a water purveyor. Requirements within Provision C.15 (exempt and conditionally exempt discharges) generally cost 5% of a FTE or \$4,500 annually.

Overall local program implementation costs, including street sweeping, are currently \$288,109 (FY 2013/14).

Table 4 provides readily available information on estimated revenues and expenditures for the City's stormwater program. Table 5 provides estimated labor and associated costs for selected MRP Provisions. Estimates are based on information provided by City staff unless otherwise indicated.

Table 4. City of Brisbane's Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Measure M <sup>2</sup>					\$75,000	
					\$22,200	
Local Stormwater Assessment <sup>3</sup>	\$51,387	\$51,024	\$51,141	UA <sup>4</sup>	\$51,242	
<b>Subtotal</b>					<b>\$148,442</b>	
<b>Other Revenue:</b>						
General Fund					UA	
Gas Tax					UA	
<b>Subtotal</b>						
<b>Expenditures:</b>						
Street Sweeping		\$15,995		\$20,109	\$22,200	
NPDES Annual Budget <sup>5</sup>	\$56,133	\$57,133	\$164,789	\$222,939	\$288,109	
<b>Subtotal</b>	<b>NA<sup>6</sup></b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. Measure M allocation reported by C/CAG.
3. A local parcel tax referred to as the Stormwater Fee. FY 2013/14 value from Controller's office with administrative fee deducted.
4. UA – Unavailable.
5. Includes street sweeping.
6. NA – Not Applicable

Table 5. City of Brisbane’s Estimated Labor Costs by MRP Provision<sup>1</sup>

Program Element	Estimated FTE	Estimated Associated Cost
C.2 Municipal Operations and C.10 Trash Load Reduction	0.60	\$54,000
C.3 Development	0.05	\$7,200
C.4 Industrial and Commercial Site Controls	UA <sup>2</sup>	UA
C.5 Illicit Discharge Detection and Elimination	UA	UA
C.6 Construction Site Control	0.30	\$40,500
C.7 Public Information and Outreach	0.60	\$57,600
C.8 Water Quality Monitoring	NA <sup>3</sup>	NA
C.9. Pesticides Toxicity Control	UA	UA
C.11 Mercury Controls	NA	NA
C.12 PCB Controls	NA	NA
C.13 Copper Controls	UA	UA
C.14 PBDEs, Legacy Pesticides and Selenium	NA	NA
C.15 Exempted and Conditionally Exempted Discharges	0.05	\$4,500
Overall Program Management	0.25	\$60,000

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. UA – Unavailable
3. NA – Not Applicable

## 2.4. City of Burlingame

The City of Burlingame’s stormwater program is implemented by the Public Works Department, with assistance from a consultant (Veolia Water). The NPDES coordinator is responsible for implementation of stormwater activities.

The stormwater program is funded by the General Fund. Beginning FY 2012-13, this is supplemented with monies from Measure M fees. Residents approved a parcel tax/fee two years ago for storm drain infrastructure improvements that will be in place for 30 years. However, monies from the parcel tax will not cover any MRP-compliance related work. The City collects a fee for Plan review; however, there is not a separate line item for tracking Provision C.3 (development) or Provision C.6 (construction controls) requirements. Costs associated with stormwater program staff time and expenses are not tracked.

The City’s stormwater-related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 2,000 inlets. It is estimated that cleaning catch basins after storms costs \$3,900 annually. The City has stormwater pump stations and the associated monitoring for dissolved oxygen, data collection and reporting is estimated to cost \$7,112 annually. The annual cost for street sweeping is \$204,173, which is funded through the garbage collection fee. The annualized equipment capital and maintenance cost is estimated to be \$37,500. This is funded with monies from AB 1546.

The cost for all stormwater related inspections, enforcements, and reporting, i.e., C.3 (post-construction BMPs), C.4 (businesses/commercial inspections), C.5 (illicit discharge), and C.6 (construction site inspections) is estimated to be approximately \$18,000 per year. Through an agreement with the City, the

San Mateo County Environmental Health Department conducts commercial and industrial inspections (Provision C.4) on the city’s behalf, and charges an inspection fee to businesses to cover costs.

The cost for project reviews associated with post-construction requirements (Provision C.3, development) is estimated to be \$6,000 per year.

Public outreach compliance efforts (Provision C.7) are conducted by SMCWPPP. The City conducts two local creek cleanups annually. Cost details are not available.

The City estimates spending approximately \$13,000 per year on monitoring and data collection required by Provision C.9 (pesticide toxicity control) requirements. Pest management is contracted out; however, current costs are not available.

Work associated with Provision C.10 (trash controls) is estimated to cost approximately \$7,000.

The City has not dedicated additional time or staff to implement Provision C.13 (copper controls). Architectural copper is not widely used in the City.

Requirements within Provision C.15 (exempt and conditionally exempt discharges) are applicable to the City. The City estimates spending approximately \$10,600 per year for monitoring discharges, and approximately \$11,500 for data collection and reporting.

The City estimates spending approximately \$11,900 on CIP projects (inspection, enforcement, and data collection and reporting). Overall local program implementation costs are currently \$453,460 (FY 2012/13).

Tables 6 and 7 provide readily available information on estimated revenues and expenditures for the City’s stormwater program, respectively. Estimates are based on information provided by City staff. Information was not available to break down expenditures by MRP Provision.

Table 6. City of Burlingame’s Revenues for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Measure M <sup>2</sup>				\$125,668		
Plan Review Fee				UA <sup>3</sup>		
Garbage Collection Fee for Street Sweeping				\$204,173		
<b>Subtotal</b>				<b>\$329,841</b>		
<b>Other Revenue:</b>						
General Fund				UA		
<b>Subtotal</b>						

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. Measure M allocation reported by C/CAG.
3. UA – Unavailable.



Table 7. City of Burlingame's Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
Expenditures						
Planning, management and administration				\$5,602		
C.3 activities				\$6,600		
Development reviews				\$14,662		
Inspections (C.3, C.4, C.5, C.6)				\$11,113		
Enforcement (C.3, C.4, C.5, C.6)				\$2,045		
Reporting (C.3, C.4, C.5, C.6)				\$5,156		
Equip. annualized capital costs maintenance				\$21,000		
Equipment annualized maintenance costs				\$16,500		
Operator costs				\$204,173		
Data collection				\$7,692		
Monitoring				\$6,329		
Trash capture device maintenance				\$1,963		
Trash capture devices replacements				\$1,963		
Cleaning catch basins after storm				\$3,926		
Data collection and reporting				\$5,557		
DO testing				\$1,767		
Data collection and reporting				\$5,345		
Integrated Pest Management				UA <sup>2</sup>		
Monitoring				\$7,004		
Data collection and reporting				\$4,756		
UDF program turbidity tests				\$10,660		
Data collection and reporting				\$11,528		
City's CIP Projects				\$1,091		
NPDES compliance inspections				\$3,111		
Enforcement actions				\$2,333		
Data collection and reporting				\$5,380		
Preparation of Annual Report				\$11,160		
Coord. with County and TAC/consultants etc.				\$14,760		
Coordination with Regional Water Board				\$1,137		
				<b>\$394,313</b>		
				<b>\$59,147</b>		
				<b>\$453,460<sup>3</sup></b>		

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. UA – Unavailable.
3. Includes Street Sweeping.

## 2.5. Town of Colma

The Town of Colma's stormwater program is implemented by the Public Works and Engineering Departments, with assistance from the Planning and Building Departments. Staff from Engineering, Public Works, and Planning attends SMCWPPP meetings and keeps informed about regional stormwater issues. Interdepartmental monthly meetings are also held to receive updates on the MRP and project tasks and deliverables.

The stormwater program is funded by a portion of Measure M fund and the General Fund. The Town uses 50% of its \$75K Measure M allotment as dedicated revenue towards MRP compliance expenses. The General Fund supports the remainder of these expenses. Staff time or expenses pertaining to stormwater permit compliance or stormwater expenses are paid through various budget line items in the public works operations and maintenance budget, and these expenses are not specifically tracked. The Town does not assess any property related fee to fund the stormwater program.

The Town's stormwater-related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 248 inlets. The Town estimates spending 360 hours/year (plus equipment and material cost) to inspect and clean the storm drain inlets. The Town does not have any stormwater pumping stations. The Town estimates spending an hour of staff time for annual corporation yard inspections. Staff spends approximately 48 hours/month (plus equipment and material cost) on street sweeping. Other costs associated with MRP compliance including BMP implementation (e.g., street and road repair maintenance, sidewalk/plaza maintenance and pavement washing, bridge and structure maintenance and graffiti removal) are paid through various budget line items in the public works operations and maintenance budget, and these expenses are not specifically tracked. The Town has four employees responsible for maintenance activities, one supervisor and three crew members.

Town staff reviews approximately between 4 and 9 projects with post-construction requirements per year (Provision C.3, development). The level of effort and time devoted to this work is dependent upon project size and site complexities. Reviews specific to Provision C.3 are estimated to take 2-16 hours per project (e.g., review, coordination and meeting with applicants and engineers, O&M agreements), depending on the familiarity of the applicant with C.3 requirements. The Town's engineering division conducts C.3 post-construction BMP inspections. Currently, the Town spends 10-20 staff hours per year on post-construction BMP inspections, follow-ups, coordination, and reports.

The Public Works Department conducts commercial and industrial inspections (Provision C.4) of about 15 facilities. The remaining facilities are inspected by the San Mateo County Environmental Health Department. In addition Town staff also performs follow-up inspections at some high priority businesses. Public Works staff also responds to illicit discharges (Provision C.5) and coordinates with Code Enforcement for resolution of these discharges in a timely manner. Through an agreement with the Town, the San Mateo County Environmental Health Department conducts commercial and industrial inspections (Provision C.4) on the town's behalf, and charges an inspection fee to businesses to cover costs.

Town staff reviews on average 5 projects per year with stormwater construction requirements (Provision C.6, construction controls). Inspection costs specific to Provision C.6 are not tracked.

Public outreach compliance efforts (Provision C.7) are conducted by SMCWPPP and supported by the Town through distribution of program materials and advertisement through the Town's newsletter and

website. Town staff coordinates with SMCWPPP for scheduling outreach events at schools located in the vicinity of the Town which children from Colma attend. Cleanup of trash hot spots and the Colma creek concrete channel is done through a contractor. Residents participate in the annual Town-wide Earth Day Event and Cleanup Day Event.

Work associated with Provision C.9 (pesticide toxicity control) is performed by IPM-certified contractors. Staff from the Town and the contractors attends IPM meetings and workshops sponsored by SMCWPPP. Town staff monitors the contractors for implementation of IPM measures. Costs for implementing this provision are not specifically tracked. Costs associated with Provision C.10 (trash controls) is paid through the public works operations and maintenance budget, and these expenses are not specifically tracked. Staff spends about 16 hours annually to inspect and clean installed trash capture devices. The Town plans to install additional trash capture devices and this will increase labor and maintenance costs for inspections and cleanups. Provision C.13 (copper controls) is implemented by the Engineering and Building Departments through distribution of BMP brochures to applicants and review of project plans. Architectural copper is not widely used in the Town.

Requirements within Provision C.15 (exempt and conditionally exempt discharges) are generally not applicable to the Town. The Town is not a water purveyor.

The estimated cost for preparing the Town’s Annual Report is \$6,000 - \$8,000 (80 - 100 hours between Engineering, Public Works and Planning Department staff).

Table 8 provides readily available information on estimated revenues and expenditures for the Town’s stormwater program. An approximate estimate of the Town’s annual stormwater compliance expenditure is \$124,618, not including annual street sweeping costs of \$51,215. Table 9 provides estimated annual staff hours associated with selected MRP Provisions. All estimates in Tables 8 and 9 are based on information provided by Town staff.

Table 8. Town of Colma’s Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

		Amounts by Fiscal Year					TOTAL
		FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
Dedicated Revenue:							
	Measure M <sup>2</sup>				\$37,500		
	<b>Subtotal</b>				<b>\$37,500</b>		
Other Revenue:							
	General Fund <sup>2</sup>				\$138,333		
	<b>Subtotal</b>				<b>\$138,333</b>		
Expenditures:							
	Street Sweeping				\$51,215		
	Local Stormwater Program				\$124,618		
	<b>Subtotal</b>				<b>\$175,833</b>		

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. The Town uses 50% of its \$75K Measure M allotment as dedicated revenue towards MRP compliance expenses. The General Fund supports the remainder of these expenses.

Table 9. Town of Colma’s Estimated Annual Staff Hours by MRP Provision<sup>1</sup>

City of Colma’s Program Element	Estimated Annual Staff Hours
C.2 Municipal Operations	339
C.3 New Development and Redevelopment	96
C.4 Industrial and Commercial Site Controls	40
C.5 Illicit Discharge Detection and Elimination	62
C.6 Construction Site Control	24
C.7 Public Information and Outreach	UA <sup>2</sup>
C.8 Water Quality Monitoring	NA <sup>3</sup>
C.9. Pesticides Toxicity Control	UA
C.10 Trash Load Reduction	UA
C.11 Mercury Controls	NA
C.12 PCB Controls	NA
C.13 Copper Controls	UA
C.14 PBDEs, Legacy Pesticides and Selenium	NA
C.15 Exempted and Conditionally Exempted Discharges	UA
Annual Report	80 - 100

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. UA – Unavailable.
3. NA – Not Applicable.

## 2.6. City of Daly City

The City of Daly City’s stormwater program is implemented through various City Departments (Public Works, Economic and Community Development, and Water and Wastewater Resources). In addition, source control and illicit discharge activities are performed under the auspices of the North San Mateo County Sanitation District, a subsidiary of the City of Daly. City staff attends SMCWPPP meetings and keeps informed about regional stormwater issues.

Since 1995, Daly City has utilized a local stormwater assessment adopted in Ordinance No. 1219 to finance local requirements mandated by municipal stormwater NPDES permits. On an annual basis, this local fee generates approximately \$440,000.

The City’s stormwater-related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 2,181 inlets. Costs associated with MRP compliance including BMP implementation (e.g., street and road repair maintenance, sidewalk/plaza maintenance and pavement washing, bridge and structure maintenance and graffiti removal) are not specifically tracked.

The City uses a wastewater treatment plant source control inspector to conduct commercial and industrial inspections (Provision C.4). This inspector also responds to illicit discharges (Provision C.5). About 400 inspections are performed annually. The cost of tracking and reporting of the inspections is estimated to be \$30,500 per year. Approximately 27 illicit discharge incidents occurred in FY 2012/13, resulting in an estimated cost to the City of \$10,500.

Daly City is built out with very few projects subject to post-construction requirements (Provision C.3, development). Even if the regulated project threshold is lowered to 5,000 ft<sup>2</sup> under future municipal stormwater permits, the City doesn't anticipate much additional staff effort to comply with C.3 requirements.

City staff reviews approximately 1 to 2 projects per year with stormwater construction requirements (Provision C.6, construction controls). All inspectors are cross trained allowing them to perform the various inspections required by different programs. Therefore, inspection costs specific to Provision C.6 are not tracked.

Costs associated with public outreach efforts (Provision C.7) including coordination with the public, coordinating school-based outreach, and citizen involvement events are not tracked.

Work and costs associated with Provision C.10 (trash controls) are not separately tracked. The City is examining installation of a trash capture device as a capital expenditure. This project is being funded through the Sanitation District.

Costs associated with Provision C.9 (pesticide toxicity control) are not tracked. The City has not dedicated additional time or staff to implement Provision C.13 (copper controls). Architectural copper is not widely used in the City.

Daly City is a water purveyor. Compliance with requirements associated with Provision C.15 (exempt and conditionally exempt discharges) generally costs the City about \$15,000 annually.

The overall local program implementation budget (not including street sweeping) is currently \$451,516 (FY 2012/13). Street sweeping is funded by the Sanitation District and is estimated to cost \$397,236 for FY 2012/13.

Table 10 provides readily available information on estimated revenues and expenditures for the City's stormwater program. Estimates are based on information provided by City staff. Information was not available to break down expenditures by MRP Provision.

Table 10. City of Daly City's Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Measure M <sup>2</sup>			\$0	\$0		
Local Stormwater Assessment			\$449,000	\$440,271 <sup>3</sup>		
Sanitation District for Street Sweeping			\$375,044	\$397,236		
<b>Subtotal</b>			<b>\$874,044</b>	<b>\$837,507</b>		
<b>Other Revenue:</b>						
General Fund	NA <sup>4</sup>	NA	NA	NA		
<b>Subtotal</b>						
<b>Expenditures:</b>						
Street Sweeping			\$375,044	\$397,236		
NPDES Annual Budget	\$460,530	\$460,705	\$460,981	\$451,516		
<b>Subtotal<sup>5</sup></b>			<b>\$836,025</b>	<b>\$848,752</b>		

Notes:

1. Information generally based on interviews with and documentation provided by Permittee staff.
2. Measure M funds are used for transportation purposes, not stormwater compliance.
3. FY 2013/14 value from Controller's office with administrative fee deducted.
4. NA – Not Applicable
5. Includes street sweeping.

## 2.7. City of East Palo Alto

The City of East Palo Alto's stormwater program is implemented under the Community Development program. Planning, Engineering, Building and Maintenance Departments are all under Community Development. The City does not have a separate Public Works department. The Environmental Coordinator is responsible for coordinating the stormwater requirements. Approximately 60% of the Environmental Coordinator's time is spent on stormwater-related work.

The stormwater program is funded by a local assessment (a parcel tax, \$20/parcel, total \$120,000 for FY 2012/13) and monies from Measure M and Measure A.<sup>6</sup> The City has a specific charge number for tracking monies received through the parcel tax. However, activities are not tracked by permit provision. A cost breakdown for Measure M and Measure A funding is not available. The City has started charging a fee for Plan review; however, there is not a separate line item for tracking Provision C.3 (development) or Provision C.6 (construction controls) requirements.

The City's stormwater-related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 500 inlets. A cost breakdown for dry and wet weather monitoring of pump stations, annual corporation yard inspections, and other maintenance BMPs (e.g., street and road repair maintenance, sidewalk/plaza maintenance and pavement washing, bridge and structure maintenance and graffiti removal) is not available. All of these activities comprise approximately 0.55 FTE.

<sup>6</sup>Measure A is a sales tax. The county transportation authority provides 25% of this revenue to local municipal agencies for transportation improvement projects. Any revenue from this source reported by a municipality was not included in that municipality's total dedicated revenue in this report.

City staff reviews projects that are required to meet post-construction requirements (Provision C.3, development). The level of effort and time devoted to this work is dependent upon project size and whether the project is completed. The Environmental Coordinator estimates spending 5 hours/week on plan reviews for C.3 compliance. In addition, planning counter staff spends 1 hour/week educating applicants on requirements. Due to the small number of post-construction BMPs, the City does not spend significant time on conducting BMP O&M inspections.

The Environmental Coordinator conducts commercial and industrial inspections of 30-40 sites each year (Provision C.4). The City is mostly residential. Inspection time is not tracked. The City does not currently sub-contract inspections to the San Mateo County Environmental Health Department. The City works with County Health, Code Enforcement and the District Attorney's office to address illicit discharges. However, illicit discharges are not a significant problem in the City. Through an agreement with the City, the San Mateo County Environmental Health Department conducts commercial and industrial inspections (Provision C.4) on the city's behalf, and charges an inspection fee to businesses to cover costs.

City staff reviews approximately 10 projects per year with stormwater construction requirements (Provision C.6, construction controls). Inspections specific to Provision C.6 are estimated to cost 5% of a FTE.

The City conducts public outreach activities (Provision C.7) through SMCWPPP, Recology, and the City of Palo Alto's sanitary sewer outreach programs. The City conducts 2-3 creek cleanups per year.

City staff spends approximately 20-25 hours annually to inspect and clean trash capture devices for Provision C.10 (trash controls).

Work associated with Provision C.9 (pesticide toxicity control) is performed by municipal staff and contractors. Municipal staff conducts landscape pest management with the level of effort estimated at 25% of a FTE. Structural pest control is contracted out. Cost information is not available.

Requirements within Provision C.15 (exempt and conditionally exempt discharges) are applicable to the City. The City estimates spending about 80 hours of staff time annually on tracking data.

The City estimates spending about two months of staff time each year on preparing the annual report.

The overall local program implementation budget for FY 2012/13 was \$169,285 (this includes JPA dues used for maintenance of San Francisquito Creek.)

Table 11 provides readily available information on estimated revenues and expenditures for the City's stormwater program. Table 12 provides estimated labor associated with selected MRP Provisions. Estimates are based on information provided by City staff.

Table 11. City of East Palo Alto's Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Local Stormwater Assessment				\$121,523 <sup>2</sup>		
Measure M <sup>3</sup>				\$97,444		
Plan Review Fee				UA <sup>4</sup>		
<b>Subtotal</b>				<b>\$218,967</b>		
<b>Other Revenue:</b>						
General Fund				NA <sup>5</sup>		
Measure A				UA		
<b>Subtotal</b>						
<b>Expenditures:</b>						
Street Sweeping				??		
Stormwater Program				\$169,285 <sup>6</sup>		
<b>Subtotal</b>				<b>??</b>		

Notes:

- Information based on interviews with and documentation provided by Permittee staff.
- FY 2013/14 value from Controller's office with administrative fee deducted.
- Measure M allocation reported by C/CAG. *How much is used for MRP compliance, if any?*
- UA – Unavailable.
- NA – Not Applicable.
- Includes JPA dues used for maintenance of San Francisquito Creek.

Table 12. City of East Palo Alto's Estimated Labor Costs by MRP Provision<sup>1</sup>

Program Element	Estimated Labor
C.2 Municipal Operations	0.55 FTE
C.3 Development	312 hours/year
C.4 Industrial and Commercial Site Controls	UA <sup>2</sup>
C.5 Illicit Discharge Detection and Elimination	UA
C.6 Construction Site Control	0.05 FTE
C.7 Public Information and Outreach	UA
C.8 Water Quality Monitoring	NA <sup>3</sup>
C.9. Pesticides Toxicity Control	0.25 FTE
C.10 Trash Load Reduction	40 hours/year
C.11 Mercury Controls	NA
C.12 PCB Controls	NA
C.13 Copper Controls	UA
C.14 PBDEs, Legacy Pesticides and Selenium	NA
C.15 Exempted and Conditionally Exempted Discharges	40 hours/year
Annual Report Preparation	2 months/year

Notes:

- Information based on interviews with and documentation provided by Permittee staff.
- UA - Unavailable
- NA – Not Applicable



## 2.8. City of Foster City

The City of Foster City's stormwater program is implemented through the Public Works Department. The Public Works Department includes Engineering and Streets. The Planning Department is separate. The Building Department is within the Planning Department.

The City is 80% built-in and mostly residential. There are a limited number of commercial establishments. Staff from the stormwater program attends SMCWPPP meetings and keeps informed about regional stormwater issues.

The stormwater program is funded by Measure M, Measure A, and the General Fund, but a breakdown is not available. The City charges a fee for plan review; however, a line item for specifically funding stormwater related reviews and inspections is not in place.

The City's stormwater-related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 2,000 inlets. Costs associated with municipal maintenance activities are not tracked, and cannot be estimated at this time. The City has one stormwater pumping station; however, costs associated with implementing the dissolved oxygen monitoring requirement are minimal and not tracked. Street sweeping is funded through garbage collection fees paid by property owners. The cost is approximately \$80,000 to \$90,000 per year. The City estimates that it spends approximately 200 hours of staff time each year preparing the annual report (at \$50/hour).

The City's Planning Department is responsible for post-construction requirements (Provision C.3, development). Reviews specific to Provision C.3 are estimated to require 0.1 FTE. The costs for the O&M inspection and verification program for post-construction devices are not tracked. The City currently has only three post-construction BMPs in place.

Through an agreement with the City, the San Mateo County Environmental Health Department conducts commercial and industrial inspections (Provision C.4) on the city's behalf, and charges an inspection fee to businesses to cover costs. City staff inspects the remaining businesses (approximately 50). Costs for conducting inspections are not tracked. The Public Works Department, code enforcement, and Planning are responsible for following-up on illicit discharges (Provision C.5). The cost for this activity is not tracked.

Public Works staff conducts inspections of construction project sites (Provision C.6, construction controls). Costs for conducting construction site inspections are not tracked.

Public outreach compliance efforts (Provision C.7) are conducted by SMCWPPP, including outreach at schools and community events. The City does not have any creeks located within its boundaries.

Work associated with Provision C.10 (trash controls) is not tracked. However, the City estimates spending a total budget of \$100,000 per year for implementing all trash related activities.

Work associated with Provision C.9 (pesticide toxicity control) is contracted out. Structural pest control is contracted out. The Parks Department is responsible for landscape pest control. Costs are not tracked. The City has not dedicated additional time or staff to implement Provision C.13 (copper controls). Architectural copper is not widely used in the City.

Requirements within Provision C.15 (exempt and conditionally exempt discharges) are applicable to the City. The City monitors discharges only at the point of discharge to San Francisco Bay. Associated cost information is not available. The City does not receive requests for discharging dechlorinated water to the storm drain.

Table 13 provides readily available information on estimated revenues and expenditures for the City's stormwater program. Overall local stormwater program implementation costs were not available. Information was generally not available to break down expenditures by MRP Provision. Estimates are generally based on information provided by City staff.

Table 13. City of Foster City's Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
Dedicated Revenue:						
Measure M				\$99,227 <sup>2</sup>		
Plan Review Fee				UA <sup>3</sup>		
<b>Subtotal</b>				<b>\$99,227</b>		
Other Revenue:						
General Fund				UA		
Measure A				UA <sup>3</sup>		
<b>Subtotal</b>						
Expenditures:						
Street Sweeping				\$90,000		
Local Stormwater Program				UA		
<b>Subtotal</b>						

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. Measure M allocation reported by C/CAG. *How much is used for MRP compliance, if any?*
3. UA – Unavailable.

## 2.9. City of Half Moon Bay

The City of Half Moon Bay's stormwater program is implemented through the Community Development Department which includes the Planning, Building, Engineering and Maintenance Departments. Staff from the stormwater program attends SMCWPPP meetings and keeps informed about regional stormwater issues.

The City has a mix of residential and commercial developments. The residential areas are mostly single-family homes.

The stormwater program is partially funded by San Mateo County Measure M and supplemented by the City's General Fund. Reliance on City's General Fund for funding MRP compliance activities limits City's ability to fund other civic programs. Moreover, the general fund revenue varies based on tax receipts or

emergency expenditures. Additional revenue from reliable sources dedicated only to stormwater permit compliance programs is needed.

The City's stormwater-related municipal operations mandated by MRP Provision C.2 include maintenance of the City's storm drain system and cleaning of miles of roadside ditches and pipes with approximately 625 storm drain inlets. This work is done by contractors. Maintenance staff is responsible for municipal maintenance activities as it relates to BMPs for corporation yard maintenance and roadway maintenance. The City does not have stormwater pump stations. Street sweeping is included in the trash hauler's contract and the cost is paid by residents/businesses as part of their waste collection charges. A few MRP Provision C.3 regulated projects (e.g., two senior housing projects) were recently approved and constructed in the City. Costs for review and initial construction inspections are collected through the permit fees. However, the City does not have a mechanism to recover costs for the O&M inspection and verification program for post-construction inspections and tracking.

Through an agreement with the City, the San Mateo County Environmental Health Department conducts commercial and industrial inspections (Provision C.4) on the city's behalf, and charges an inspection fee to businesses to cover costs. A few businesses (approximately 20) are not inspected by the County (they are non-food/non-hazmat) and the City has the responsibility to inspect these businesses. The City does not have a mechanism to recover costs for these inspections.

The Public Works Department is responsible for inspecting, abating, and follow-up on Illicit discharges (MRP Provision C.5). The cost for this activity is not tracked.

Building/Engineering Inspection staff conducts construction site stormwater inspections (MRP Provision C.6, construction controls). Initial inspection costs are recovered through the permit fee; however, the City does not have a mechanism to recover costs for additional inspections.

Public outreach compliance efforts (MRP Provision C.7) are mainly conducted by SMCWPPP and supported by the City's stormwater program staff. The City conducts local outreach by providing stormwater brochures at selected locations and through the City's website.

The cost of training associated with MRP Provision C.9 (pesticide toxicity control) is estimated at 40-60 hours/year. The City contracts out structural pesticide control work. City staff is responsible for landscape maintenance and pest control at the City's parks, facilities, and rights-of-way.

The City does not have a mechanism to recover costs for work associated with MRP Provision C.10 (trash controls). The City installed 36 trash capture devices through the San Francisco Estuary Partnership grant-funded project and is planning to install additional devices. These devices are inspected and cleaned by a contractor. City Staff is responsible for cleanup at the City's designated trash hot spot. In addition, staff assists in volunteer trash hot spot cleanups.

Architectural copper is not widely used in the City (MRP Provision C.13, copper controls). Requirements within MRP Provision C.15 (exempt and conditionally exempt discharges) are generally not applicable to the City. The City is not a water purveyor. In addition, the City does not receive requests for discharging de-chlorinated water to the storm drain.

A major anticipated cost for the City is the implementation of cleaning and maintaining ditches that convey stormwater. This activity requires California Department of Fish and Wildlife approval. Due to the long approval process, the City has deferred maintenance for three years. Costs include \$30,000 for CEQA, \$60,000-70,000 for Department of Fish and Wildlife permits. Annual maintenance costs are estimated at 200-250 staff hours (\$72/hour) and equipment rental (170 hours at \$62/hour).

Table 14 provides readily available information on estimated revenues and expenditures for the City's stormwater program. The information needed to estimate local program implementation costs was not currently available. Estimates are based on information provided by City staff. Information was not available to break down expenditures by MRP Provision.

Table 14. City of Half Moon Bay's Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Measure M				\$37,500 <sup>2</sup>		
<b>Subtotal</b>				<b>\$37,500</b>		
<b>Other Revenue:</b>						
<b>Subtotal</b>						
<b>Expenditures:</b>						
Street Sweeping <sup>3</sup>						
Local Stormwater Program				UA <sup>4</sup>		
<b>Subtotal</b>						

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. The portion used for MRP compliance of the \$75,000 Measure M allocation reported by C/CAG.
3. Street sweeping costs (approximately \$55,000) are paid by residents via garbage fees.
4. UA – Unavailable.

## 2.10. Town of Hillsborough

The Town of Hillsborough's stormwater program is implemented through the Public Works Department. Public works includes engineering, streets and operations. Planning and Building are in a separate department. Staff from the stormwater program attends SMCWPPP meetings and keeps informed about regional stormwater issues.

Currently, the Town is 100% residential, consisting of single-family homes. There are plans to develop new residential sub-divisions within a few years.

The stormwater program is funded by a local assessment (parcel tax, \$29,500 annually, \$7.34/parcel).

Measure M, Measure A, and the General Fund provide additional funding (cost breakdown was not available). Staff time or expenses pertaining to stormwater permit compliance or stormwater expenses are not tracked. The Town charges a fee for plan review; however, there is not a separate line item for tracking Provision C.3 (development) or Provision C.6 (construction controls) requirements.

The Town has five Streets Department staff that is responsible for municipal operations (Provision C.2), in addition to traffic control, signage etc. The total salary package plus overtime is \$425,000, of which approximately 20% is estimated to be spent on stormwater activities. Every September - November staff spend all of its time cleaning storm drains before and after rains (mainly for leaves). The Town's storm drain system consists of 1,116 catch basins, 130 inlet structures and 276 outfalls. The Town does not have any stormwater pumping stations. The Town does not have a street sweeping program. Parcel owners are required to maintain the street frontage of their houses.

Since the Town consists of single-family homes, most post-construction requirements (Provision C.3, development) do not apply. The Town distributes fact sheets pertaining to single-family requirements during plan review. Many houses already have underground detention vaults. The Town contracts out plan review and erosion control inspections. The total cost is \$192,600/year. The Town has only one post-construction BMP that requires inspection.

Requirements to conduct commercial and industrial inspections (Provision C.4) do not apply to the Town. The Public Works and Police Departments respond to illicit discharges (Provision C.5), but this is not a significant issue for the Town.

The Town Engineer and Building Inspector review approximately five construction projects per year that fall under the C.6.e.iii inspection reporting criteria (Provision C.6, construction controls). Staff time for inspections is not tracked.

Public outreach compliance efforts (Provision C.7) are mainly conducted by SMCWPPP. The Town conducts limited outreach to schools (two hours/year) and hosts one creek clean-up per year.

Work associated with Provision C.9 (pesticide toxicity control) is performed by the Streets Department. The Town spent \$5,000 for associated municipal staff training in FY 2012/13. Landscape maintenance is contracted out. The cost was \$57,094 in FY 2012/13. The Town has not dedicated additional time or staff to implement Provision C.13 (copper controls). Architectural copper is not widely used in the Town. However, the architectural copper handout developed by SMCWPPP is distributed to the applicant during the building permit plan review and is available at Town Hall for the public.

Work associated with Provision C.10 (trash controls) is not tracked. Provision C.10 requirements applicable to the Town are addressed through increased frequency of maintenance. The Town is a water purveyor and requirements of Provision C.15 (exempt and conditionally exempt discharges) apply. The Town owns and uses a NO-DES truck for planned discharges like fire hydrant cleaning. There is no water discharged during this operation. The truck requires four staff members. NO-DES flushing events are exempt from associated reporting requirements. Staff time spent monitoring and reporting planned discharges is not tracked because no water is discharged.

Table 15 provides readily available information on estimated revenues and expenditures for the Town's stormwater program. Overall local stormwater program implementation costs were not available. Information was generally not available to break down expenditures by MRP Provision. Estimates are

based on information provided by Town staff.

Table 15. Town of Hillsborough’s Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Measure M <sup>2</sup>				\$89,432		
Plan Review Fee				UA <sup>3</sup>		
Local Stormwater Assessment		\$29,500	\$29,500	\$28,004 <sup>4</sup>		
<b>Subtotal</b>				<b>\$117,436</b>		
<b>Other Revenue:</b>						
General Fund				UA		
Measure A				UA		
<b>Subtotal</b>						
<b>Expenditures:</b>						
Street Sweeping	NA <sup>5</sup>	NA	NA	NA	NA	
Stormwater Program Budget				UA		
<b>Subtotal</b>						

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. Measure M allocation reported by C/CAG.
3. UA – Unavailable.
4. FY 2013/14 value from Controller’s office with administrative fee deducted.
5. NA – Not Applicable

## 2.11. City of Menlo Park

The City of Menlo Park’s stormwater program is implemented as a division of the Public Works Department. In addition, portions of the stormwater program are implemented by the Planning Department. City staff attends SMCWPPP meetings and keeps informed about regional stormwater issues.

The stormwater program is funded by a local assessment referred to as the Menlo Park Stormwater Management Fund that generates approximately \$330,000 annually. The Menlo Park Stormwater Management Fund was established to support local implementation of the stormwater NPDES permit requirements and is a fixed property-related fee. Menlo Park’s Measure M allocation is \$143, 095, of which approximately \$55,000 is applied towards stormwater-related purposes including street sweeping (the remainder is used for transportation-related efforts such as striping).

The City’s stormwater related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 1,500 inlets. Costs associated with MRP compliance, including BMP implementation (e.g., street and road repair maintenance, sidewalk/plaza maintenance and pavement washing, bridge and structure maintenance and graffiti removal) are not specifically tracked.

Through an agreement with the City, the San Mateo County Environmental Health Department conducts commercial and industrial inspections (Provision C.4) on the city's behalf, and charges an inspection fee to businesses to cover costs. The San Mateo County inspectors also respond to illicit discharges (Provision C.5). Costs associated with these inspections are not tracked.

Costs associated with post-construction requirements (Provision C.3, development) are managed under the Planning Department budget and not specifically tracked. The City charges a fee for plan review (three percent of construction costs) but it is not known how much of the associated staff time for plan review is related to C.3 requirements.

Costs associated with stormwater construction requirements (Provision C.6, construction controls), public outreach efforts (Provision C.7) and trash controls (Provision C.10) are not specifically tracked.

Costs associated with Provision C.9 (pesticide toxicity control) were not available. The City has not dedicated additional time or staff to implement Provision C.13 (copper controls).

Menlo Park is a water purveyor. Requirements associated with Provision C.15 (exempt and conditionally exempt discharges) are managed by the Water Department.

Table 16 provides readily available information on estimated revenues and expenditures for the City's stormwater program. Estimates are based on information provided by City staff. Information was not available to break down expenditures by MRP Provision.

Table 16. City of Menlo Park’s Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Measure M <sup>2</sup>				\$55,000		
Local Stormwater Assessment <sup>3</sup>				\$331,349 <sup>4</sup>		
Plan Review Fee				UA <sup>5</sup>		
Landscape District Assessment				\$15,300		
<b>Subtotal</b>				<b>\$401,649</b>		
<b>Other Revenue:</b>						
General Fund				\$159,000		
<b>Subtotal</b>				<b>\$159,000</b>		
<b>Expenditures:</b>						
Street Sweeping				\$241,600		
Local Stormwater Program				\$402,400		
<b>Subtotal</b>				<b>\$644,000</b>		

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. Menlo Park’s Measure M allocation is \$143, 095, of which approximately \$55,000 is applied towards stormwater-related purposes including street sweeping (the remainder is used for transportation-related efforts such as striping).
3. A fixed property-related fee referred to as the Menlo Park Stormwater Management Fund.
4. FY 2013/14 value from Controller’s office with administrative fee deducted.
5. UA – Unavailable.

## 2.12. City of Millbrae

The City of Millbrae’s stormwater program is implemented as a division of the Public Works Department. In addition, portions of the stormwater program are implemented by the Planning Department. City staff attends SMCWPPP meetings and keeps informed about regional stormwater issues.

The stormwater program is funded by a local assessment that generates approximately \$250,000 annually. The Millbrae Stormwater Enterprise Fund is a parcel tax established in 1996 to support local implementation of the stormwater permit compliance. The City also reports that “Measure M is used to fund partial MRP related stormwater activities such as inlet cleaning, storm drain repair, etc.”

The City’s stormwater-related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 800 inlets. Costs associated with MRP compliance, including BMP implementation (e.g., street and road repair maintenance, sidewalk/plaza maintenance and pavement washing, bridge and structure maintenance and graffiti removal) are not specifically tracked.

The cost of street sweeping is covered by the Enterprise Fund and is not tracked separately.



A City of Millbrae Senior Industrial Waste Inspector performs inspections of food service establishments (Provision C.4). About 600 inspections are performed annually. In addition, through an agreement with the City, the San Mateo County Environmental Health Department conducts commercial and industrial inspections (Provision C.4) on the city's behalf, and charges an inspection fee to businesses to cover costs. Estimated costs associated with all business inspections are approximately \$78,000 annually. The Senior Industrial Waste Inspector also responds to illicit discharges (Provision C.5). Costs associated with these inspections are absorbed into the wastewater pre-treatment program.

There are very few projects per year with post-construction requirements (Provision C.3, development). Costs associated with this provision are absorbed in to the current Planning budget. There are five post-construction treatment measures that require inspection. These activities are included in routine work load. The City expects a future increase of approximately 0.05 FTE to implement plan review of smaller projects (Provision C.3.i).

City staff reviews less than five projects per year with stormwater construction requirements (Provision C.6, construction controls). The City estimates needing an additional 0.25 FTE to perform future reviews of smaller projects.

Public outreach efforts (Provision C.7) are performed, in part, by the Sustainable Program Manager and are not budgeted for separately. It is estimated that about 0.45 FTE is spent on this activity as part of the environmental program.

Work associated with producing the short-term trash reduction plan, Provision C.10 (trash controls), is estimated to require 0.25 FTE. Labor associated with identifying and selecting hot spots was approximately 400 person hours. Ongoing costs associated with Provision C.10 are not tracked separately.

Costs associated with Provision C.9 (pesticide toxicity control) were not available. The City has not dedicated additional time or staff to implement Provision C.13 (copper controls). Architectural copper is not widely used in the City.

Millbrae is a water purveyor. Requirements associated with Provision C.15 (exempt and conditionally exempt discharges) generally require an expenditure of about \$11,000 annually.

The overall local stormwater program implementation budget is currently about \$870,000, including street sweeping (FY 2012/13). Street sweeping annual costs were not reported.

Table 17 provides readily available information on estimated revenues and expenditures for the City's stormwater program. Estimates are based on information provided by City staff. Information was not available to break down expenditures by MRP Provision.

Table 17. City of Millbrae’s Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Measure M				\$87,046 <sup>2</sup>		
Local Stormwater Assessment <sup>3</sup>				\$243,886 <sup>4</sup>		
Plan Review Fee				UA <sup>5</sup>		
<b>Subtotal</b>				<b>\$330,932</b>		
<b>Other Revenue:</b>						
General Fund				UA		
<b>Subtotal</b>						
<b>Expenditures:</b>						
Street Sweeping				UA		
Local Stormwater Program				\$870,000		
<b>Subtotal</b>						

Notes:

- Information based on interviews with and documentation provided by Permittee staff.
- Measure M allocation reported by C/CAG. The City reports that “Measure M is used to fund partial MRP related stormwater activities such as inlet cleaning, storm drain repair, etc.” *How much is used for MRP compliance?*
- A local parcel tax referred to as the Millbrae Stormwater Enterprise Fund.
- FY 2013/14 value from Controller’s office with administrative fee deducted.
- UA – Unavailable.

### 2.13. City of Pacifica

The City of Pacifica’s stormwater program is implemented through the Public Works Department. The Public Works Department includes Engineering, Streets, and Parks. The Planning Department is separate. The Building Department is within Planning.

The City is 80% built-in and mostly residential. There are a limited number of commercial establishments. Staff from the stormwater program attends SMCWPPP meetings and keeps informed about regional stormwater issues.

The stormwater program is funded by a local assessment (parcel tax), Measure M, Measure A and the General Fund. The cost breakdown is not available. The City charges a fee for plan review; however, there is not a line item for specifically funding stormwater-related reviews and inspections.

The City’s stormwater-related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 1,200 inlets. Costs associated with municipal maintenance activities are not tracked. The City has stormwater pumping stations, which are maintained by staff from the Waste Water Treatment Plant (WWTP). Dry and wet weather monitoring of pump stations, as required by the MRP, is also conducted by WWTP staff. Street sweeping is funded through the parcel tax and the Gas Tax. The cost was \$111,000 in FY 2012/13 and will be \$113,396 in FY 2013/14.

The City's Planning Department is responsible for post-construction requirements (Provision C.3, development). Reviews specific to Provision C.3 are estimated to require 0.20 to 0.25 FTE. The costs for the O&M inspection and verification program for post-construction devices are not tracked.

Through an agreement with the City, the San Mateo County Environmental Health Department conducts commercial and industrial inspections (Provision C.4) on the city's behalf, and charges an inspection fee to businesses to cover costs. The Public Works Department, Code Enforcement, and Planning are responsible for following-up on illicit discharges (Provision C.5). The cost for this activity is not tracked.

Building Department staff conducts inspections of private project sites (Provision C.6, construction controls). Staff time is paid by the applicant. However, an annual estimate is not available. The Public Works Department is responsible for inspecting public projects.

The City conducts limited local public outreach efforts (Provision C.7). These include outreach at schools and community events. The City also conducts three to four creek cleanups each year. Costs are not tracked.

Work associated with Provision C.9 (pesticide toxicity control) is performed by two City employees. The City does not use any contractors for pest management. Costs are not tracked. Costs for work associated with Provision C.10 (trash controls) are not tracked. The City has not dedicated additional time or staff to implement Provision C.13 (copper controls). Architectural copper is not widely used in the City.

Requirements within Provision C.15 (exempt and conditionally exempt discharges) are generally not applicable to the City. The City is not a water purveyor. In addition, the City does not receive requests for discharging dechlorinated water to the storm drain.

Table 18 provides readily available information on estimated revenues and expenditures for the City's stormwater program. Overall local program implementation costs were not available. Estimates are based on information provided by City staff. Information was not available to break down expenditures by MRP Provision.

Table 18. City of Pacifica’s Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Measure M <sup>2</sup>				\$153,891		
Local Stormwater Assessment				\$168,624 <sup>3</sup>		
Gas Tax (for Street Sweeping)				?		
Plan Review Fee				UA <sup>4</sup>		
<b>Subtotal</b>				<b>\$322,515</b>		
<b>Other Revenue:</b>						
General Fund						
Measure A				UA		
<b>Subtotal</b>						
<b>Expenditures:</b>						
Street Sweeping <sup>5</sup>				\$111,000	\$113,396	
Local Stormwater Program				UA		
<b>Subtotal</b>						

Notes:

- Information based on interviews with and documentation provided by Permittee staff.
- Measure M allocation reported by C/CAG. *How much is used for MRP compliance, if any?*
- FY 2013/14 value from Controller’s office with administrative fee deducted.
- UA – Unavailable.
- Street sweeping costs are paid for through the General Fund and Gas Tax. *Is the Gas Tax dedicated revenue used to help fund street sweeping? If so, how much is used for that purpose?*

## 2.14. Town of Portola Valley

The Town of Portola Valley’s stormwater program is implemented by the Public Works Department. Portola Valley is a mostly residential town with single family homes and a small number of commercial establishments. The town does not have plans to build multi-family developments. Portola Valley has storm drain inlets but otherwise does not have a formal storm drain system. Runoff flows into ditches. Also, many ditches are on private property where the Town lacks access. Approximately 75% of the Town is on a septic system. Sanitary sewer connection is available from West Bay Sanitary District; however, residents are required to build their own system from their house to the District’s main line.

The stormwater program is funded by Measure M and the General Fund. The staff time and expenses pertaining to stormwater permit compliance are not tracked. The Town charges a fee for plan review; however, there is not a separate line item for tracking Provision C.3 (development) or Provision C.6 (construction controls) requirements.

The Town’s stormwater-related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 400 inlets. The Town does not have any stormwater pumping stations. Street sweeping is funded through Measure M at a cost of \$12,000 per year. In addition, the town has hired staff to pick up litter around the Town at an annual cost of \$10,000. Costs associated with other maintenance activities (corporation yard inspections, street and road repair maintenance,

sidewalk/plaza maintenance and pavement washing, bridge and structure maintenance and graffiti removal) are not specifically tracked.

Since the Town consists of only single family homes, most C.3 requirements do not apply. In FY 2012/13, the Town spent 8-10 hours on implementing the C.3.i. requirements, i.e., providing information to developers and architects. Other C.3 requirements do not apply. If a large commercial project occurs in the future, C.3 review will be folded into existing plan review. No CIP projects are planned.

Through an agreement with the Town, the San Mateo County Environmental Health Department conducts commercial and industrial inspections (Provision C.4) on the town's behalf, and charges an inspection fee to businesses to cover costs. Illicit discharges (Provision C.5) generally consist of occasional water main breaks or sanitary sewer overflows. Town staff works with CalWater or the West Bay Sanitary District to resolve issues.

The Town works with a contractor to inspect for erosion control (Provision C.6, construction controls). The cost is approximately \$50,000 per year. The Town typically has about 20-30 active construction sites per year.

Public outreach compliance efforts (Provision C.7) are mainly conducted by SMCWPPP. The Town's Sustainability Coordinator conducts public outreach at fairs, speaker events, Farmer's market etc. However, this outreach is not specific to stormwater issues.

The Town spends approximately \$11,000/year in classes and trainings associated with Provision C.9 (pesticide toxicity control). Other ongoing activities related to C.9 compliance are not tracked.

The Town has two trash hot spots associated with Provision C.10 (trash controls). The hot spots are cleaned weekly at an annual cost of \$5,000.

The Town has not dedicated additional time or staff to implement Provision C.13 (copper controls).

Requirements within Provision C.15 (exempt and conditionally exempt discharges) are generally not applicable to the Town. The Town is not a water purveyor.

In addition to the costs described above, the Town estimates expenditures of about \$40,000 per year on stormwater program coordination, meetings and annual reporting. However, overall local program implementation costs were not available.

Table 19 provides readily available information on estimated revenues and expenditures for the Town's stormwater program. Estimates are based on information provided by Town staff. Information was not available to break down expenditures by MRP Provision.

Table 19. Town of Portola Valley’s Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
Dedicated Revenue:						
Measure M <sup>2</sup>				\$75,000		
Plan Review Fee				UA <sup>3</sup>		
<b>Subtotal</b>				<b>\$75,000</b>		
Other Revenue:						
General Fund				UA		
<b>Subtotal</b>						
Expenditures:						
Street Sweeping <sup>4</sup>				\$12,000		
Local Stormwater Program				UA		
<b>Subtotal</b>						

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. Measure M allocation reported by C/CAG. *How much is used for MRP compliance, if any?*
3. UA – Unavailable.
4. Street sweeping costs are paid for through Measure M.

## 2.15. City of Redwood City

The City of Redwood City’s stormwater program is implemented through the Community Development Department. Staff attends SMCWPPP meetings and keeps informed about regional stormwater issues.

The stormwater program is funded through the General Fund, the Gas Tax and Measure M. Annual expenditures for the stormwater program are about \$250,000. The annual reporting effort is estimated to cost \$35,000 each year. The budget tracks efforts related to the stormwater program and permit compliance; however, the budget is not broken down by permit provision.

The City’s stormwater related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 6,644 inlets. Costs associated with MRP compliance, including BMP implementation (e.g., street and road repair maintenance, sidewalk/plaza maintenance and pavement washing, bridge and structure maintenance and graffiti removal) are not specifically tracked.

Work associated with Provision C.10 (trash controls) is also addressed by Community Development staff. Activities associated with Provision C.2 and C.10 implementation are estimated to require three FTEs. Street sweeping costs for FY 2012/13 were about \$300,000 and are funded through the Gas Tax.

Through an agreement with the City, the San Mateo County Environmental Health Department conducts commercial and industrial inspections (Provision C.4) on the city’s behalf, and charges an inspection fee to businesses to cover costs. City staff responds to illicit discharges (Provision C.5). Costs associated with this effort are covered by the general fund and are not tracked.

Implementation of Provision C.3 (development) is implemented by Planning and Engineering staff. The City collects fees as part of the grading permit that are intended to cover SWPPP compliance. Inspections and reviews specific to Provision C.3 are estimated to require 0.25 FTE with an associated annual estimated cost of \$57,000.

City staff reviews projects with stormwater construction requirements (Provision C.6, construction controls). Inspections specific to Provision C.6 are estimated to require 0.2 FTE with an associated annual estimated cost of \$54,000.

Public outreach efforts (Provision C.7) include coordination with the public, coordinating school-based outreach, and citizen involvement events. Costs specific to this effort are not tracked.

The Parks and Recreation Department implement stormwater issues associated with Provision C.9 (pesticide toxicity control). The City has not dedicated additional time or staff to implement Provision C.13 (copper controls).

Redwood City is a water purveyor. Requirements within Provision C.15 (exempt and conditionally exempt discharges) generally require 0.25 FTE at an associated cost of \$57,000 annually.

Table 20 provides readily available information on estimated revenues and expenditures for the City's stormwater program. Table 21 provides estimated labor and direct costs associated with selected MRP Provisions. Estimates are based on information provided by City staff.

Table 20. City of Redwood City's Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Measure M				\$253,983 <sup>2</sup>		
Gas Tax – street sweeping				\$84,295		
Grading Permit Fees				UA <sup>3</sup>		
<b>Subtotal</b>				<b>\$338,278</b>		
<b>Other Revenue:</b>						
General Fund				UA		
<b>Subtotal</b>						
<b>Expenditures:</b>						
Street Sweeping <sup>4</sup>				\$300,000		
Local Stormwater Program				\$250,000		
<b>Subtotal</b>				<b>\$550,000</b>		

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. Portion of the \$280,747 Measure M allocation reported by C/CAG that is used for MRP compliance.
3. UA – Unavailable.
4. Street sweeping costs are partly funded through the Gas Tax

Table 21. City of Redwood City’s Estimated Labor and Direct Costs by MRP Provision<sup>1</sup>

Program Element	Estimated FTE	Estimated Associated Cost
C.2 Municipal Operations	UA <sup>2</sup>	UA
C.3 New Development and Redevelopment	0.25	\$57,000
C.4 Industrial and Commercial Site Controls	UA	UA
C.5 Illicit Discharge Detection and Elimination	UA	UA
C.6 Construction Site Control	0.20	\$54,000
C.7 Public Information and Outreach	UA	UA
C.8 Water Quality Monitoring	NA <sup>3</sup>	NA
C.9. Pesticides Toxicity Control	UA	UA
C.10 Trash Load Reduction	UA	UA
C.11 Mercury Controls	NA	NA
C.12 PCB Controls	NA	NA
C.13 Copper Controls	UA	UA
C.14 PBDEs, Legacy Pesticides and Selenium	NA	NA
C.15 Exempted and Conditionally Exempted Discharges	0.25	\$57,000

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. UA – Unavailable
3. NA – Not Applicable

## 2.16. City of San Bruno

The City of San Bruno stormwater program is implemented through the Public Works and Planning Departments. The stormwater program is funded by a local assessment referred to as the Stormwater Enterprise Fund, portions of Measure M, and other revenue. Funds from the General Fund are not used to support the stormwater program. The Stormwater Enterprise Fund is a parcel tax that was established to maintain the stormwater conveyance system and support local stormwater permit compliance activities. The stormwater program is tracked through the stormwater program budget account. The budget is not broken down by permit provision.

The City’s stormwater related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 1,200 inlets. The Streets and Storm Division track the labor for maintenance activities. Costs associated with MRP compliance including BMP implementation (e.g., street and road repair maintenance, sidewalk/plaza maintenance and pavement washing, bridge and structure maintenance and graffiti removal) are not specifically tracked. Street sweeping services are provided by an outside contractor. The cost of street sweeping services in FY 2012/13 was \$183,000.

Through an agreement with the City, the San Mateo County Environmental Health Department conducts commercial and industrial inspections (Provision C.4) on the city’s behalf, and charges an inspection fee to businesses to cover costs. City staff responds to illicit discharges (Provision C.5). Costs associated with these activities are not tracked.



Implementation of Provision C.3 (development) is implemented by Planning Department staff. The City collects fees and project retainers as part of the permit application process that are intended to include City costs related to stormwater compliance. At this time the City has 5-10 projects each year that require C.3 implementation. It is estimated that review related to compliance with C.3 requirements adds about \$7,500 per project.

City staff reviews approximately 500 projects per year with stormwater construction requirements (Provision C.6, construction controls). Work associated with this provision is under the Building Department. Costs associated with construction site inspections are not tracked.

Costs associated with Provision C.7 (public outreach), Provision C.9 (pesticide toxicity control), Provision C.10 (trash controls) and Provision C.13 (copper controls) are not tracked.

San Bruno is a water purveyor, but has not experienced increased costs in order to comply with the requirements of Provision C.15 (exempt and conditionally exempt discharges).

Overall local program implementation budget, including street sweeping, was \$587,760 in FY 2012/13.

Table 22 provides readily available information on estimated revenues and expenditures for the City's stormwater program. Estimates are based on information provided by City staff. Information was not available to break down expenditures by MRP Provision.

Table 22. City of San Bruno's Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Measure M <sup>2</sup>		\$37,000	\$37,000	\$19,500	\$17,551	
Local Stormwater Assessment <sup>3</sup>		\$540,000	\$570,000	\$570,000	\$561,190	
Other Revenue		\$20,000	\$13,650	\$10,000	\$14,538	
<b>Subtotal</b>		<b>\$597,000</b>	<b>\$620,650</b>	<b>\$599,500</b>	<b>\$593,279</b>	
<b>Other Revenue:</b>						
General Fund	NA <sup>4</sup>	NA	NA	NA	NA	
<b>Subtotal</b>						
<b>Expenditures:</b>						
Street Sweeping				\$183,000		
Local Stormwater Program		\$455,743	\$482,368	\$404,760	\$613,949	
<b>Subtotal</b>				<b>\$587,760</b>		

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. Portion of Measure M funds used for MRP compliance.
3. A local parcel tax referred to as the Stormwater Enterprise Fund. FY 2013/14 value from Controller's office with administrative fee deducted.
4. NA – Not Applicable

## 2.17. City of San Carlos

The City of San Carlos stormwater program is implemented through the Public Works and Planning Departments. The Program is funded by a local assessment referred to as the Storm Drainage Fee, the Gas Tax and the General Fund. The Storm Drainage Fee is parcel tax that was established to support local stormwater permit compliance activities. The stormwater program is tracked through the stormwater program budget account. The budget is not broken down by permit provision.

The City's stormwater-related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 1,300 inlets. Costs associated with MRP compliance including BMP implementation (e.g., street and road repair maintenance, sidewalk/plaza maintenance and pavement washing, bridge and structure maintenance and graffiti removal) are not specifically tracked. The City maintains three stormwater pump stations. Costs related to MRP requirements associated with the pump stations are not tracked. Street sweeping services are provided by an outside contractor and are fully funded by a garbage fee. The cost of street sweeping services in FY 2012/13 was \$83,277.

Public Works inspectors conduct commercial and industrial inspections (Provision C.4) and respond to illicit discharges (Provision C.5). The City conducts approximately 300 inspections per year. In addition, through an agreement with the City, the San Mateo County Environmental Health Department conducts a portion of the commercial and industrial inspections (Provision C.4) on the city's behalf, and charges an inspection fee to businesses to cover costs. Costs associated with these inspections were not available.

Implementation of Provision C.3 (development) is implemented by the planning staff. The City collects fees and project retainers, as part of the permit application process, that are intended to include stormwater compliance. At this time the City does not have many projects that requirement C.3 implementation. The City has one Green Street pilot project on Bransten Road that is funded through grants from C/CAG and USEPA. The City will begin tracking costs associated with the project in the fall of 2013. Future O&M inspection and verification programs will be supported by the General Fund.

City staff reviews approximately 300 projects per year with stormwater construction requirements (Provision C.6, construction controls). Work associated with this provision is divided between Public Works and the Building Departments.

Public Outreach efforts (Provision C.7) are mainly coordinated by Planning Department staff. Work associated with Provision C.10 (trash controls) is coordinated by City maintenance staff. Costs associated with Provisions C.7 And C.10 are not tracked.

Work associated with Provision C.9 (pesticide toxicity control) is performed by the Public Works Department. Costs associated with this Provision were not available. The City has not dedicated additional time or staff to implement Provision C.13 (copper controls).

Requirements within Provision C.15 (exempt and conditionally exempt discharges) are generally not applicable to the City. The City is not a water purveyor. In addition, the City does not receive requests for discharging dechlorinated water to the storm drain.

The recent overall local program implementation budget was \$465,300 (FY 2012/13), excluding street sweeping.

Table 23 provides readily available information on estimated revenues and expenditures for the City's stormwater program. Estimates are based on information provided by City staff. Information was not available to break down expenditures by MRP Provision.

Table 23. City of San Carlos' Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Garbage Fee (Street Sweeping)					\$85,276 <sup>2</sup>	
Local Stormwater Assessment <sup>3</sup>	\$486,595	\$473,919	\$514,700	\$415,861 <sup>4</sup>	\$465,400	
<b>Subtotal</b>					<b>\$550,676</b>	
<b>Other Revenue:</b>						
General Fund	UA	UA	UA	UA	UA	
Gas Tax			\$64,000	\$64,000	\$64,000	
<b>Subtotal</b>						
<b>Expenditures:</b>						
Street Sweeping <sup>5</sup>				\$83,277	\$85,276 <sup>2</sup>	
Local Stormwater Program	\$555,850	\$531,970	\$578,050	\$523,300	\$525,800	
<b>Subtotal</b>				<b>\$606,577</b>	<b>\$611,076</b>	

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. FY 2014/15 value.
3. A local parcel tax referred to as the Storm Drainage Fee.
4. FY 2013/14 value from Controller's office with administrative fee deducted.
5. Street sweeping is fully funded by the garbage fee.

## 2.18. City of San Mateo

The City of San Mateo's stormwater program is implemented through the Public Works Department under the Stormwater Pollution Control Program. The Stormwater Pollution Prevention Program protects water quality in the City and maintains consistent compliance with the MRP. City staff attends SMCWPPP meetings and keeps informed about regional stormwater issues.

The stormwater program is funded by the Stormwater Pollution Control Fund (SPCF), Measure M, and the General Fund. The SPCF was established to support local implementation of the stormwater NPDES permit requirements. The source of the SPCF is new and redevelopment related fees, which are placed into the General Fund and are dedicated to the Stormwater Pollution Control Program for MRP compliance.

The City's stormwater related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 5,000 inlets. Costs associated with MRP compliance including BMP implementation (e.g., street and road repair maintenance, sidewalk/plaza maintenance and pavement washing, bridge and structure maintenance and graffiti removal) are not specifically

tracked. Street sweeping is currently primarily funded through the Solid Waste Department as a fee on the garbage bill. The current cost of street sweeping is estimated at \$400,000 per year. The street sweeping program is currently being revised to justify posting areas of the City and to meet the trash reduction requirements.

The City uses wastewater treatment plant source control inspectors to conduct commercial and industrial inspections (Provision C.4). These inspectors also respond to illicit discharges (Provision C.5). Costs associated with these inspections are not tracked. In addition, through an agreement with the City, the San Mateo County Environmental Health Department conducts commercial and industrial inspections (Provision C.4) on the city's behalf, and charges an inspection fee to businesses to cover costs.

Costs associated with post-construction requirements (Provision C.3, development) are funded through the current Planning Department budget and the SPCF. Actual costs associated with MRP compliance are not specifically tracked.

City staff reviews approximately 2,500 projects per year with stormwater construction requirements (Provision C.6, construction controls). The City collects fees as part of the grading permit that are intended to cover SWPPP Compliance. Costs associated with stormwater construction requirements are not specifically tracked. Costs associated with public outreach efforts (Provision C.7) and Provision C.10 (trash controls) are not specifically tracked.

Requirements associated with Provision C.9 (pesticide toxicity control) have not caused measurable impacts to costing or staffing. The City has not dedicated additional time or staff to implement Provision C.13 (copper controls). Requirements within Provision C.15 (exempt and conditionally exempt discharges) are generally not applicable to the City. The City is not a water purveyor. In addition, the City does not receive requests for discharging dechlorinated water to the storm drain.

Table 24 provides readily available information on estimated revenues and expenditures for the City's stormwater program. Estimates are based on information provided by City staff. Information was not available to break down expenditures by MRP Provision.

Table 24. City of San Mateo’s Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Measure M				\$262,922 <sup>2</sup>		
SPCF <sup>3</sup>			\$36,627	\$30,000	\$30,000	
Garbage Bill (street sweeping) <sup>4</sup>				\$320,000		
<b>Subtotal</b>				<b>\$612,922</b>		
<b>Other Revenue</b>						
General Fund			\$164,938	\$311,051	\$315,520	
<b>Subtotal</b>						
<b>Expenditures</b>						
Street Sweeping <sup>4</sup>				\$400,000		
Local Stormwater Program			\$201,565	\$341,051	\$345,520	
<b>Subtotal</b>				<b>\$741,051</b>		

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. Seventy-five percent of the \$350,562 Measure M allocation reported by C/CAG, the assumed portion of Measure M that will be used for stormwater permit compliance in 2014 and onwards.
3. Stormwater Pollution Control Fund - the source of the SPCF is new and redevelopment related fees, which are placed into the General Fund and are dedicated to the Stormwater Pollution Control Program for MRP compliance.
4. Street sweeping is currently primarily funded through the Solid Waste Department as a fee on the garbage bill.

## 2.19. San Mateo County

The San Mateo County stormwater program is implemented under several County Departments including the Department of Public Works (DPW), the Flood Control District, Planning and Building, Parks, and Environmental Health. County staff attends SMCWPPP meetings and keeps informed about regional stormwater issues.

There is no dedicated funding for the County stormwater program except that Measure M funds are used to fund portions of the street sweeping program and annual stormwater permit fees are collected from businesses inspected by County Environmental Health (see below). However, the majority of the stormwater program is absorbed by existing department budgets. The County has activity codes and can track expenditures for some portions of the stormwater program.

The County’s stormwater related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 1,700 inlets and is primarily managed by the DPW. Mapping of inlets and placement of inlet markers is estimated to have cost \$50,000 to-date. Maintenance project tasks and work associated pump station MRP requirements are tracked. However, costs associated with MRP compliance including BMP implementation (e.g., street and road repair maintenance, sidewalk/plaza maintenance and pavement washing, bridge and structure maintenance and graffiti removal) are not specifically tracked. The County’s street sweeping program is partially funded by Measure M.

The County conducts commercial and industrial inspections in the unincorporated areas of the County (Provision C.4). A County Environmental Health stormwater coordinator oversees all aspects of Provision C.4 inspections and responds to illicit discharges (Provision C.5). About 230 commercial inspections are performed annually in the unincorporated areas of the County. County Environmental Health tracks routine inspections, follow-up inspections, complaints and field surveys. Annual stormwater permit fees are collected from businesses that County Environmental Health already inspects under the hazardous materials and food inspection programs. The fee is risk-based (high \$120, medium \$60, low \$30). During FY 2012/13, County Environmental Health received approximately \$225,000 in revenue from stormwater inspection fees (Table 25). Costs associated with tracking and reporting were approximately \$3,000 for FY 2012/13.

The County's stormwater related post-construction requirements (Provision C.3, new development and redevelopment) are managed by the Planning and Building Department and DPW. The costs for project review and inspections are covered by application fees. However, not all costs are recovered. Fees are collected for DPW's review of project elements within the County right-of-way, drainage elements, and connections to the County storm drain system (\$400) and DPW's review of stormwater BMPs and post-construction stormwater controls (\$258). Additional reviews and inspections (i.e., required O&M verification activities) are \$100. All fees are retained by DPW. DPW's estimated unrecovered cost related to C.3 is approximately \$96,000. The Planning and Building Department is currently considering imposing similar fees related to O&M management, review, and inspection.

Since MRP adoption, the Planning and Building Department has spent approximately \$30,000 to \$50,000 each year performing construction-related inspections (Provision C.6, construction site controls) and other NPDES compliance activities. The projected cost for FY 2013/14 is \$53,000. There is currently no fee structure in place for C.6 stormwater regulated site review, construction site inspections, and erosion control plan review by Planning and Building Department staff.

The County's stormwater public outreach efforts (Provision C.7) are coordinated by the Environmental Health pollution prevention team, which also implements specific MRP-required public outreach funded through SMCWPPP for the benefit of all Permittees. The current budget for the SMCWPPP public outreach program is about \$360,000. This program includes coordination with the public, coordinating school-based outreach, and citizen involvement events.

Costs associated with implementing portions of Provision C.9 (pesticide toxicity control) are tracked by the County. Approximately \$5,000 is spent for Park staff trainings, certification and implementation. Implementing the IPM policy has increased costs associated with roadside vegetation maintenance. Costs have increased approximately \$427,000 per year to mow instead of spray.

Work associated with Provision C.10 (trash controls) includes preparing short and long term trash reduction plans. The County tracks some but not all costs for trash reduction. It is estimated that the County spent \$25,000 to prepare the short-term trash reduction plan and it is estimated that the long term plan will cost approximately \$50,000. The Parks Department estimated spending about \$40,000 to prepare the short-term trash reduction plan and anticipates a similar cost for preparation of the long term plan. The costs associated with identifying and selecting hotspots is minimal. Approximately \$20,000 per year is spent on trash hot spot cleanup efforts.

The County has not dedicated additional time or staff to implement Provision C.13 (copper controls).

The County is a water purveyor and subject to the requirements associated with Provision C.15 (exempt and conditionally exempt discharges). The County has not had any reportable planned or unplanned discharges to-date.

The County anticipates future costs related to compliance with potential future stormwater permit provisions related to 1) the Fitzgerald Marine Preserve which has been designated an Area of Special Biological Significance (ASBS) and 2) bacteria and sediment Total Maximum Daily Loads (TMDLs) water quality restoration programs. The local stormwater program expenditure value in Table 25 includes the associated estimated future annual costs (about \$290,000 per year).

Table 25 provides readily available information on estimated revenues and expenditures for the County's stormwater program. Information was generally not available to break down expenditures by MRP Provision. Estimates are based on information provided by County staff.

Table 25. County of San Mateo's Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Measure M (street sweeping) <sup>2</sup>				\$386,806		
Stormwater Permit Fees <sup>3</sup>		\$175,000	\$205,410	\$225,360		
Development Application Fees				UA <sup>4</sup>		
O&M Verification Fees				UA		
<b>Subtotal</b>				<b>\$612,166</b>		
<b>Other Revenue</b>						
General Fund						
<b>Subtotal</b>						
<b>Expenditures</b>						
Street Sweeping <sup>5</sup>				\$611,894		
Local Stormwater Program				\$2,347,517 <sup>6</sup>		
<b>Subtotal</b>				<b>\$2,959,411</b>		

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. Measure M allocation reported by C/CAG. Measure M funds are used to fund portions of the street sweeping program.
3. Stormwater permit fees are for facility inspections.
4. UA – Unavailable.
5. Street sweeping is partly funded by Measure M monies.
6. Includes estimated future expenditures associated with Area of Special Biological Significance (ASBS) and Total Maximum Daily Load (TMDL) compliance.

## 2.20. City of South San Francisco

The City of South San Francisco's stormwater program is implemented as a division of the Public Works Department. The Environmental Compliance Supervisor coordinates the wastewater pretreatment and stormwater programs. All provisions of the MRP are implemented through the stormwater program. In addition, staff from the stormwater program attends SMCWPPP meetings and keeps informed about regional stormwater issues.

The stormwater program is funded by a local assessment referred to as the Stormwater Fund, the Gas Tax, Measure M, and the General Fund. The Stormwater Fund was established in 1993 to support local implementation of stormwater permit compliance activities and is a parcel tax. The rate of tax established in 1993 has not changed since its inception. The stormwater program is further subsidized by monies from the Gas Tax and the General Fund to address the increase in stormwater permitting requirements. All monies in the stormwater program are applied to efforts related to MRP compliance; however, the budget is not broken down by permit provision. Stormwater expenses are tracked by the following categories:

- Stormwater Administration: Accounts for administration support, permitting fees and public outreach efforts.
- Drainage: Accounts for street sweeping and catch basin maintenance.
- Inspection: Accounts for all inspections required by the MRP, including in relation to planning trash controls.

The City's stormwater-related municipal operations (Provision C.2) include maintenance of a storm drain system with approximately 2,500 inlets. In addition, the City maintains eight stormwater pumping stations. Dry and wet weather monitoring of pump stations, as required by the Permit, is estimated to add approximately eight hours per year to routine maintenance costs. Annual corporation yard inspections add 1.5 hours per year to routine operating costs. Other costs associated with MRP compliance, including BMP implementation (e.g., street and road repair maintenance, sidewalk/plaza maintenance and pavement washing, bridge and structure maintenance and graffiti removal) are budgeted for under the general category of Drainage and not specifically tracked. Street sweeping costs are approximately \$336,000 per year.

Creek cleanups are performed four to six times per year, with participation by crews from the Fire Department, non-profit groups and City staff. In general, each creek cleanup costs about \$4,000 for City staff to coordinate and implement.

The City has three full time environmental compliance inspectors to conduct commercial and industrial inspections (Provision C.4). These inspectors also respond to illicit discharges (Provision C.5). About 600 inspections are performed annually requiring approximately 0.55 FTE. This expense is charged to the Inspection budget.

City staff reviews approximately three to four projects per year with post-construction requirements (Provision C.3, development). The level of effort and time devoted to this work is dependent upon project size and if the project is completed. Inspections and reviews specific to Provision C.3 are estimated to require 0.1 FTE. The City estimates 0.05 FTE is required to conduct an O&M inspection and verification program for post-construction devices.



City staff reviews approximately three to six projects per year with stormwater construction requirements (Provision C.6, construction controls). Inspections specific to Provision C.6 are estimated to require 0.15 FTE.

Public outreach efforts (Provision C.7) necessitate about 0.2 FTE and include coordination with the public, coordinating school-based outreach, and citizen involvement events.

Work associated with Provision C.9 (pesticide toxicity control) is performed by the Parks and Recreation Department. Cost estimates for conducting activities related to this provision were not available. The City has not dedicated additional time or staff to implement Provision C.13 (copper controls). Architectural copper is not widely used in the City.

Work associated with Provision C.10 (trash controls) is charged to the Inspection account and is estimated to require 0.2 FTE.

Requirements within Provision C.15 (exempt and conditionally exempt discharges) are generally not applicable to the City. The City is not a water purveyor. In addition, the City does not receive requests for discharging dechlorinated water to the storm drain system.

Table 26 provides readily available information on estimated revenues and expenditures for the City's stormwater program. Table 27 provides estimated labor and associated costs for selected MRP Provisions. Estimates are based on information provided by City staff.

Table 26. City of South San Francisco's Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Measure M				\$225,000	\$225,000	
Local Stormwater Assessment <sup>2</sup>	\$420,667	\$406,389	\$405,898	\$404,858 <sup>3</sup>	\$405,000	
<b>Subtotal</b>				<b>\$629,858</b>	<b>\$630,000</b>	
<b>Other Revenue</b>						
General Fund		\$250,000	\$275,000	\$175,000	\$175,000	
Gas Tax	\$445,000	\$445,000	\$595,000	\$465,000	\$465,000	
Other	\$123,127	\$4,936	\$10,853	\$1,000	\$5,000	
<b>Subtotal</b>						
<b>Expenditures</b>						
Street Sweeping				\$336,000		
Stormwater Administration	\$100,468	\$88,859	\$62,359	\$45,456		
Drainage	\$669,368	\$554,169	\$622,423	\$734,439		
Inspection	\$62,068	\$49,447	\$157,604	\$123,643		
Miscellaneous			\$67,149	\$34,529		
<b>Subtotal</b>				<b>\$1,274,067</b>		

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. A local parcel tax referred to as the Stormwater Fund.
3. FY 2013/14 value from Controller's office with administrative fee deducted.

Table 27. City of South San Francisco’s Estimated Labor Costs by MRP Provision<sup>1</sup>

Program Element	Estimated FTE
C.2 Municipal Operations	0.10
C.3 New Development and Redevelopment	0.15
C.4 Industrial and Commercial Site Controls	0.55
C.5 Illicit Discharge Detection and Elimination	0.10
C.6 Construction Site Control	0.15
C.7 Public Information and Outreach	0.20
C.8 Water Quality Monitoring	NA
C.9. Pesticides Toxicity Control	UA
C.10 Trash Load Reduction	0.20
C.11 Mercury Controls	NA
C.12 PCB Controls	NA
C.13 Copper Controls	UA
C.14 PBDEs, Legacy Pesticides and Selenium	NA
C.15 Exempted and Conditionally Exempted Discharges	UA

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. UA – Unavailable
3. NA – Not Applicable

## 2.21. Town of Woodside

The Town of Woodside’s stormwater program is implemented by Public Works Department. Woodside is a residential town with one elementary school and a small number of commercial establishments. The Town does not have a formal storm drain system and stormwater runoff flows to ditches. Portions of the Town are on septic systems. The town has 16 employees and two employees from Public Works are responsible for stormwater compliance. As needed, Town staff attends SMCWPPP meetings and keeps informed about regional stormwater issues.

The stormwater program is funded by Measure M and the General Fund. Additionally, Gas Tax monies are used to fund street sweeping. Staff time or expenses pertaining to stormwater permit compliance are not tracked. The Town charges a fee for Plan review; however, there is not a separate line item for tracking Provision C.3 (development) or Provision C.6 (construction) requirements.

The Town’s annual funding for maintenance work is about \$1.5 million (\$800,000 in staff time and \$500,000 for contractors). This includes road repairs, cleaning ditches and other maintenance activities. Town maintenance staff cleans storm drain ditched every year before the storm season and maintains them throughout the year. Street sweeping costs are \$895/month or \$10,728/year. Budget breakdowns for other activities specific to stormwater-related municipal operations (Provision C.2) are not available. The Town does not have any stormwater pumping stations.

The Town consists of only single family homes; therefore, most of the C.3 requirements do not apply. The Town does not have any road projects planned. Single family homes are required to prevent erosion and retain runoff on site.

Public Works staff conducts commercial and industrial inspections (Provision C.4) at the two commercial facilities located in Woodside. In addition, through an agreement with the Town, the San Mateo County Environmental Health Department conducts commercial and industrial inspections (Provision C.4) on the town's behalf, and charges an inspection fee to businesses to cover costs. Illicit discharges (Provision C.5) can consist of occasional sanitary sewer overflows.

Due to the large parcel size, most construction activities are covered under the statewide Construction General Permit. Town staff may inspect for erosion control and bring in code enforcement, as needed (Provision C.6, construction controls). Time spent on these inspections is not tracked.

Public outreach compliance efforts (Provision C.7) are conducted by SMCWPPP. Creek cleanups are performed by private property owners.

Efforts associated with Provision C.9 (pesticide toxicity control) includes no application of pesticides by staff. The budget for this activity is included in the \$1.5 million designated for municipal maintenance work. The Town hires contractors for four sites. These include three buildings (Town Hall, library and museum) and one park. The total cost is \$8,670/month.

The Town has one trash hot spot associated with Provision C.10 (trash controls). The hot spot is cleaned annually; however, the cost of the cleanup is not tracked. The Town has not dedicated additional time or staff to implement Provision C.13 (copper controls). Many houses within the Town use copper downspouts.

Requirements within Provision C.15 (exempt and conditionally exempt discharges) are generally not applicable to the Town. The Town is not a water purveyor.

The Town estimates spending three weeks of staff time each year preparing the annual report.

Table 28 provides readily available information on estimated revenues and expenditures for the Town's stormwater program. Information was generally not available to break down expenditures by MRP Provision. Estimates are based on information provided by Town staff.

Table 28. Town of Woodside’s Revenues and Expenditures for Local Stormwater Program<sup>1</sup>

	Amounts by Fiscal Year					TOTAL
	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	
<b>Dedicated Revenue:</b>						
Measure M <sup>2</sup>				\$75,000		
<b>Subtotal</b>				<b>\$75,000</b>		
<b>Other Revenue</b>						
General Fund				UA <sup>3</sup>		
Gas Tax				UA		
<b>Subtotal</b>						
<b>Expenditures</b>						
Street Sweeping <sup>4</sup>				\$10,728	\$10,728	
Local Stormwater Program				\$10,000	\$10,000	
<b>Subtotal</b>				<b>\$20,728</b>	<b>\$20,728</b>	

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. Measure M allocation reported by C/CAG. *Is all of Measure M allotment used for MRP compliance? Does dedicated revenue really exceed expenditures as this table suggests? Note that capital improvements and repairs of piping and ditches are not considered MRP compliance and are therefore not included here.*
3. UA - Unavailable
4. Street sweeping is funded by Gas Tax monies.

## 2.22. Summary of SMCWPPP and Member Agency Costs and Revenue

Table 29 provides a summary of estimated revenue and expenditures for SMCWPPP and local stormwater programs, based on the following sources of information:

- The revenue and expenditure data presented above in Sections 2.1 through 2.21.
- SMCWPPP FY 2013/14 budgets for SMCWPPP revenue and expenditures.

Table 29. Summary of Estimated Stormwater Compliance Expenditures and Revenues for SMCWPPP and Local Stormwater Programs<sup>1</sup>

Jurisdiction	Population	Estimated Annual Compliance Expenditures <sup>2</sup>	Estimated Annual Street Sweeping Expenditures	Estimated Annual Dedicated Revenue
SMCWPPP	NA <sup>3</sup>	\$ 2,752,320	NA	\$ 2,220,000
Atherton	6,917	UA <sup>4</sup>	\$ 12,000	\$ 80,000
Belmont	26,031	\$ 1,146,346	\$ 182,000	\$ 427,726
Brisbane	4,328	\$ 288,109	\$ 22,200	\$ 148,442
Burlingame	29,009	\$ 453,460	\$ 241,673	\$ 329,841
Colma	1,805	\$ 175,833	\$ 51,215	\$ 37,500
Daly City	101,920	\$ 848,752	\$ 397,236	\$ 837,507
East Palo Alto	28,366	\$ 169,285 <sup>5</sup>	UA	\$ 218,967
Foster City	30,790	UA	\$ 90,000	\$ 75,000
Half Moon Bay	11,415	UA	NA	\$ 37,500
Hillsborough	10,927	UA	NA	\$ 117,436
Menlo Park	32,319	\$ 644,000	\$ 241,600	\$ 401,649
Millbrae	21,714	\$ 870,000	UA	\$ 330,932
Pacifica	37,526	UA	\$ 113,396	\$ 322,515
Portola Valley	4,391	UA	\$ 12,000	\$ 75,000
Redwood City	77,712	\$ 550,000	\$ 300,000	\$ 338,278
San Bruno	41,842	\$ 587,760	\$ 183,000	\$ 593,279
San Carlos	28,615	\$ 611,076	\$ 85,276	\$ 550,676
San Mateo	97,966	\$ 741,051	\$ 400,000	\$ 612,922
SSF	64,067	\$ 1,274,067	\$ 336,000	\$ 629,858
Woodside	5,336	\$ 20,728	\$ 10,728	\$ 75,000
SM County	61,706	\$ 2,959,411 <sup>6</sup>	\$ 611,894	\$ 612,166
<b>TOTALS</b>	<b>724,702</b>	<b>\$ 14,092,198</b>	<b>\$ 3,290,218</b>	<b>\$ 9,072,194</b>

Notes:

1. Information based on interviews with and documentation provided by Permittee staff.
2. Includes street sweeping except where otherwise indicated (not applicable to SMCWPPP).
3. NA – Not Applicable.
4. UA – Unavailable.
5. Street sweeping not included.
6. Includes estimated future expenditures associated with Area of Special Biological Significance (ASBS) and Total Maximum Daily Load (TMDL) compliance.

### **3.0 FUTURE PERMIT COMPLIANCE COSTS**

The MRP expires November 30, 2014. Funding initiative project team members are currently participating in a Steering Committee and associated workgroups with Regional Water Board staff to develop future permit provisions. Based on the deliberations to date it appears that significant changes in level of effort and associated cost are not anticipated in most “core” areas of compliance (e.g., public outreach, industrial inspections, municipal operations, pesticide controls, and water quality monitoring). Instead, it is anticipated that major increases in level of effort and cost will primarily be associated with two areas of the permit: 1) trash controls, and 2) PCBs/mercury controls. Sections 3.1 and 3.2 describe projected future annual costs associated with these controls. Because the discussions and negotiations regarding the next regional stormwater permit are at an early stage, a great deal of uncertainty remains regarding what requirements will eventually be adopted. To estimate the level of effort and associated costs for future trash and PCBs/mercury control requirements, best professional judgment was used to develop hypothetical but plausible scenarios of future implementation of enhanced control actions. Thus, although the estimates are based on the best information available at this time, they should be considered highly uncertain order of magnitude approximations.

It should also be noted that, based on a simple analysis performed by staff from the City of San Jose, during the next permit term development-related compliance costs may increase by roughly 15% to 20% over current costs. This would be due to an anticipated lower threshold for regulated project size and potential new Green Street requirements. However, current costs to comply with development regulations are not readily available, making calculation of these incremental costs problematic. Regardless, such future development-related incremental costs would likely be small relative to the future costs of trash and PCBs/mercury controls described below. In addition, part or all of development-related incremental costs to local jurisdictions may be recouped via cost-recovery programs (e.g., plan review and inspection fees). Furthermore, the PCBs/mercury controls future cost estimates include retrofitting Green Streets throughout San Mateo County (see Section 3.2 below).

#### **3.1. Estimated Costs to Comply with Future Trash Control Requirements**

As part of developing long-term trash control plans under the current municipal stormwater permit, each municipal agency in San Mateo County has recently identified trash generation areas within its jurisdiction. Table 30 provides the area in acres of currently untreated trash generation area identified in each jurisdiction; the total combined estimated area in San Mateo County is 11,360 acres. Costs to comply with anticipated trash control requirements under the next municipal regional stormwater permit were estimated based on the assumption that these areas in each jurisdiction would be treated by full-capture devices. Although other controls may be used to partly or fully address trash generated in these areas, the extent to which such alternate methods could be used is unknown at this time. Thus, the assumption was made that the currently untreated trash generation areas would be entirely addressed via installation and maintenance of full-capture devices.

Table 31 shows area-based average capital costs for trash full capture devices including materials, construction, and installation costs. Table 31 also provides average annual Operation and Maintenance (O&M) costs for trash full capture devices (BASMAA 2008).

Table 30. Average Capital Costs to Address Currently Untreated Trash Generation Area in Each San Mateo County Jurisdiction Trash Full Capture Devices.

Jurisdiction	Untreated Trash Generation Area (acres) <sup>1</sup>	Average Capital Costs for Trash Full Capture Devices <sup>2</sup>
Atherton	98	\$47,345
Belmont	167	\$80,840
Brisbane	296	\$143,407
Burlingame	346	\$167,544
Colma	113	\$54,906
Daly City	965	\$467,147
East Palo Alto	911	\$440,944
Foster City	850	\$411,570
Half Moon Bay	126	\$61,033
Hillsborough	44	\$21,174
Menlo Park	635	\$307,544
Millbrae	250	\$120,815
Pacifica	333	\$161,019
Portola Valley	71	\$34,327
Redwood City	1667	\$807,367
San Bruno	637	\$308,582
San Carlos	353	\$170,884
San Mateo (City)	1252	\$605,994
SSF	1524	\$737,898
Woodside	23	\$11,172
San Mateo (County)	700	\$339,028
<b>Total:</b>	<b>11,360</b>	<b>\$5,500,540</b>

<sup>1</sup>Includes designated “Very High,” “High” and ½ of “Moderate” trash generation areas per municipal long-term trash control plans currently under development.

<sup>2</sup>Assumes unit cost of \$4,842 per acre and treatment of an additional 1,136 acres each year over a 10-year period for a total of 11,360 acres treated at the end of the 10 year period. Other costs such as reporting and “hot spot” cleanup are considered negligible and are not included.

Table 31. Average Unit Capital and O&M Costs for Trash Full Capture Devices (BASMAA 2008).

Description and Basis	Unit	Cost
Average capital costs per unit area for trash full capture devices including materials, construction, and installation costs.	Per acre treated	\$4,842
Average annual O&M costs per unit area for trash full capture devices.	Per acre treated per year	\$504

Table 30 applies the average capital costs for trash full capture devices to estimate annual capital costs to address currently untreated trash generation areas in each San Mateo County jurisdiction with these devices. The cost estimation model assumes treatment of one-tenth (1,136 acres) of the total combined trash generation area from each jurisdiction is added each year over a 10-year period for a countywide total of 11,360 acres treated at the end of the ten-year period. Spreading total capital costs evenly over 10 years is consistent with the timetable for reaching trash reduction goals in the current permit.<sup>7</sup>

Table 32 shows the assumed area treated and estimated O&M cost to address currently untreated trash generation area in each jurisdiction with full capture devices. The unit O&M cost of \$504 per acre per year from Table 31 was applied in developing these cost estimates. The O&M costs shown in Table 32 are for the first five years of the above-described 10 year period, since five years is the anticipated term of the next municipal stormwater permit. Table 32 illustrates that O&M costs would increase each year as the assumed total area treated increases each year.

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<sup>7</sup>This first-order cost estimate does not include complexities such as net present worth cost adjustments.



Table 32. Assumed Area Treated and Estimated O&M Cost to Address Currently Untreated Trash Generation Area in Each San Mateo County Jurisdiction with Trash Full Capture Devices.

Jurisdiction	Year 1		Year 2		Year 3		Year 4		Year 5	
	Area Treated (acres)	O&M Cost	Area Treated (acres)	O&M Cost	Area Treated (acres)	O&M Cost	Area Treated (acres)	O&M Cost	Area Treated (acres)	O&M Cost
Atherton	9.8	\$4,928	19.6	\$9,856	29.3	\$14,784	39.1	\$19,713	48.9	\$24,641
Belmont	16.7	\$8,415	33.4	\$16,829	50.1	\$25,244	66.8	\$33,658	83.5	\$42,073
Brisbane	29.6	\$14,927	59.2	\$29,854	88.9	\$44,781	118.5	\$59,708	148.1	\$74,636
Burlingame	34.6	\$17,439	69.2	\$34,879	103.8	\$52,318	138.4	\$69,758	173.0	\$87,197
Colma	11.3	\$5,715	22.7	\$11,430	34.0	\$17,145	45.4	\$22,861	56.7	\$28,576
Daly City	96.5	\$48,625	193.0	\$97,250	289.4	\$145,875	385.9	\$194,500	482.4	\$243,125
East Palo Alto	91.1	\$45,898	182.1	\$91,795	273.2	\$137,693	364.3	\$183,590	455.3	\$229,488
Foster City	85.0	\$42,840	170.0	\$85,680	255.0	\$128,520	340.0	\$171,360	425.0	\$214,200
Half Moon Bay	12.6	\$6,353	25.2	\$12,706	37.8	\$19,059	50.4	\$25,412	63.0	\$31,765
Hillsborough	4.4	\$2,204	8.7	\$4,408	13.1	\$6,612	17.5	\$8,816	21.9	\$11,020
Menlo Park	63.5	\$32,012	127.0	\$64,024	190.5	\$96,036	254.1	\$128,048	317.6	\$160,060
Millbrae	25.0	\$12,576	49.9	\$25,151	74.9	\$37,727	99.8	\$50,302	124.8	\$62,878
Pacifica	33.3	\$16,760	66.5	\$33,521	99.8	\$50,281	133.0	\$67,041	166.3	\$83,802
Portola Valley	7.1	\$3,573	14.2	\$7,146	21.3	\$10,719	28.4	\$14,292	35.4	\$17,865
Redwood City	166.7	\$84,038	333.5	\$168,076	500.2	\$252,114	667.0	\$336,153	833.7	\$420,191
San Bruno	63.7	\$32,120	127.5	\$64,240	191.2	\$96,360	254.9	\$128,480	318.7	\$160,600
San Carlos	35.3	\$17,787	70.6	\$35,574	105.9	\$53,362	141.2	\$71,149	176.5	\$88,936
San Mateo (City)	125.2	\$63,077	250.3	\$126,155	375.5	\$189,232	500.6	\$252,310	625.8	\$315,387
SSF	152.4	\$76,807	304.8	\$153,614	457.2	\$230,422	609.6	\$307,229	762.0	\$384,036
Woodside	2.3	\$1,163	4.6	\$2,326	6.9	\$3,489	9.2	\$4,652	11.5	\$5,815
San Mateo (County)	70.0	\$35,289	140.0	\$70,578	210.1	\$105,868	280.1	\$141,157	350.1	\$176,446
<b>Total</b>	<b>1,136</b>	<b>\$572,547</b>	<b>2,272</b>	<b>\$1,145,094</b>	<b>3,408</b>	<b>\$1,717,641</b>	<b>4,544</b>	<b>\$2,290,188</b>	<b>5,680</b>	<b>\$2,862,735</b>

### 3.2. Estimated Costs to Comply with Future PCB/Mercury Control Requirements

To estimate level of effort and associated costs for PCBs/mercury control requirements, best professional judgment was used to model hypothetical but plausible scenarios of future implementation of enhanced control actions under the next municipal regional stormwater permit. The scenario modeling methodology is briefly summarized below. SMCWPPP (2014) provides further details and documentation.

All geographic areas within San Mateo County were assumed to fall within one of three PCBs/mercury load reduction opportunity categories with the following characteristics:

1. **High Opportunity** – areas mainly within old industrial land uses with known PCBs/mercury sources or where PCBs/mercury were used or recycled. High opportunity areas have relatively high concentrations of PCBs/mercury in street dirt, sediment removed from the Municipal Separate Storm Sewer System (MS4), or in stormwater runoff. These areas have relatively high PCBs/mercury loading yields and provide relatively high opportunity for cost-effective controls.
2. **Moderate Opportunity** – land uses in the moderate opportunity category include old urban land uses and old industrial areas that do not fall into the high opportunity category and have not been redeveloped. Moderate opportunity areas have moderate concentrations of PCBs/mercury in street dirt, sediment removed from the MS4, or in stormwater runoff. These areas have moderate PCB/mercury loading yields and provide moderate opportunity for cost-effective controls.
3. **Low/No Opportunity** – land uses in the low/no opportunity category include newly urbanized areas, open spaces, and parks where PCBs/mercury were unlikely to have been used, transported or recycled. PCBs/mercury concentrations in street dirt, sediment removed from the MS4, or in stormwater runoff from these areas are near, at, or below analytical detection limits. These areas have relatively low PCB/mercury loading yields and provide low or no opportunity for cost-effective controls.

Five-percent of old industrial land use areas (i.e., areas that appeared to be industrial in 1968 based on an aerial photograph GIS analysis) in San Mateo County jurisdiction was assumed to be high opportunity. The land area assumed to be moderate opportunity for the control measures implementation scenarios is comprised of the remaining 95% of the old industrial area (i.e., the old industrial area that was not assumed to be high opportunity) and 20% of the older urban land use area. The basis for assuming that 20% of the old urban area is moderate opportunity is that approximately 80% of the old urban land use area in San Mateo County is comprised of residential, school, and university land uses and this area was assumed to be low opportunity. The remaining 20% of the old urban land use area was assumed to be moderate opportunity.

In addition, 30% of the area within the Pulgas Creek Pump Station watershed (all in the City of San Carlos) was assumed to be high opportunity and the remaining 70% was assumed to be moderate opportunity. This watershed is a well-studied urban drainage in San Carlos comprised mainly of old industrial land uses and known to have relatively high levels of PCBs in sediments from street and stormwater conveyances in comparison to other Bay Area watersheds. All other land uses (e.g., new urban and open space) were assumed to be low/no opportunity. Figure 1 illustrates the assumptions

made for this process of assigning geographic areas within San Mateo County to the PCBs/mercury load reduction opportunity categories.

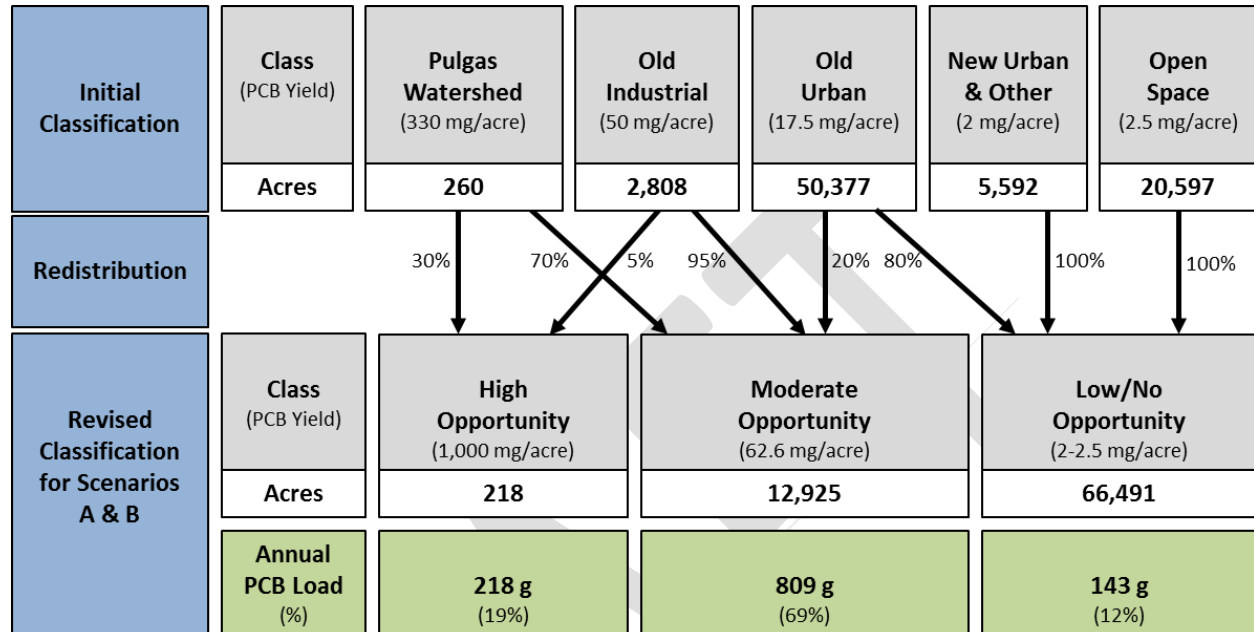


Figure 1. San Mateo County Land Use Acres, PCB Load Rates, and Assigned Opportunity Categories (SMCWPPP 2014).

SMCWPPP (2014) presents a number of scenarios for control measure implementation in high opportunity areas. For each scenario presented, cost-benefit calculations were made based on implementation of a given control measure in a fixed percentage of the high opportunity area each year. The costing results from Scenario A-3, the most costly of the high opportunity area scenarios, were applied for the purposes of this funding initiative needs analysis. This scenario assumes the following controls are applied in the following portions of high opportunity areas:

- Source Property Identification and Abatement - 100% of high opportunity area (with 10% identified as a source property for subsequent abatement).
- Stormwater Treatment Retrofits - 90% of high opportunity area.

Thus 100% percent of the high opportunity area in each San Mateo County jurisdiction was multiplied by a 20-year annualized unit cost for Source Property Identification and Abatement (\$28/acre investigated-year). In addition, 90% was multiplied by a 20-year annualized unit cost for stormwater treatment (\$28,300/acre treated-year). These values were summed to represent the total estimated annual cost to implement future PCBs/mercury controls in each jurisdiction’s high opportunity area.

The costing results from a second scenario from SMCWPPP (2014), designated Scenario B, were additionally applied for the purposes of this funding initiative needs analysis. This scenario assumes that

additional PCBs/mercury load reductions would be achieved opportunistically via retrofitting of Green Street projects into public roadways in moderate opportunity areas (95% of old industrial land uses and old urban land uses excluding residential, school and university land uses) over a 50-year period of time. It was assumed that 20% of the moderate opportunity area in each San Mateo County jurisdiction (i.e., the approximate amount of land surface covered by non-freeway roadways) would be treated by retrofitted Green Streets. This area in each jurisdiction was multiplied by a 50-year annualized unit cost for Green Street retrofitting (\$6,520/acre treated-year) to represent the total estimated annual cost to implement future PCBs/mercury controls in each jurisdiction’s moderate opportunity area.

Finally, the total estimated future PCBs/mercury annual cost for each jurisdiction was determined by summing the results of the above calculations for the high opportunity and moderate opportunity scenarios.

### 3.3. Summary of Future Costs

Table 33 summarizes estimated countywide annual costs using the scenarios developed for future implementation of enhanced trash and PCB/mercury control actions under the next regional stormwater permit (Sections 3.1 and 3.2). Table 33 illustrates that the cost estimation models allocate the capital costs for trash and all costs for PCB/mercury controls evenly over each year of the future permit term. However, trash control O&M costs increase each year with the assumed increase in total area treated from year to year in each jurisdiction (see Section 3.1).

Table 33. Summary of Estimated Countywide Annual Costs Based on Scenarios for Future Implementation of Enhanced Trash and PCB/Mercury Control Actions under the Next Regional Stormwater Permit

Description	Year of Next Regional Stormwater Permit Term				
	Year 1	Year 2	Year 3	Year 4	Year 5
Trash Controls Capital	\$5,500,540	\$5,500,540	\$5,500,540	\$5,500,540	\$5,500,540
Trash Controls O&M	\$572,547	\$1,145,094	\$1,717,641	\$2,290,188	\$2,862,735
PCB and Mercury Controls	\$22,592,497	\$22,592,497	\$22,592,497	\$22,592,497	\$22,592,497
<b>Total</b>	<b>\$28,665,584</b>	<b>\$29,238,131</b>	<b>\$29,810,678</b>	<b>\$30,383,225</b>	<b>\$30,955,772</b>

## 4.0 SUMMARY OF EXPENDITURES, DEDICATED REVENUE, AND PROJECTED SHORTFALLS

Table 34 provides a summary of annual estimates for current and projected future expenditures, dedicated revenue, and projected shortfalls for SMCWPPP and each member agency. For agencies lacking data, current expenditures were extrapolated based on average per capita expenditures of the agencies for which data were available (see Sections 2.1 through 2.21). Future trash control annual O&M costs were averaged over a five-year period. The projected shortfalls were calculated by summing estimated existing expenditures and future costs and then subtracting estimated dedicated revenues.

Table 34. Summary of Current and Projected Future Expenditures, Dedicated Revenue, and Projected Shortfalls for SMCWPPP and Each Member Agency

Agency	Population	Estimated Existing Annual Compliance Expenditures <sup>1</sup>	Population-Extrapolated Existing Annual Compliance Expenditures	Estimated Future Trash Control Annual Capital Costs	Estimated Future Trash Control Annual O&M Costs	Estimated Future PCB/Mercury Annual Control Costs	Estimated Annual Dedicated Revenue <sup>1</sup>	Estimated Annual Shortfall
SMCWPPP	NA <sup>2</sup>	\$ 2,752,320	NA	NA	NA	NA	\$ 2,220,000	\$ 532,320
Atherton	6,917	UA <sup>3</sup>	\$ 122,504	\$ 47,345	\$ 14,784	\$ 113,634	\$ 80,000	\$ 218,267
Belmont	26,031	\$ 1,146,346	NA	\$ 80,840	\$ 25,244	\$ 487,114	\$ 427,726	\$ 1,311,818
Brisbane	4,328	\$ 288,109	NA	\$ 143,407	\$ 44,781	\$ 939,169	\$ 148,442	\$ 1,267,025
Burlingame	29,009	\$ 453,460	NA	\$ 167,544	\$ 52,318	\$ 1,558,660	\$ 329,841	\$ 1,902,141
Colma	1,805	\$ 175,833	NA	\$ 54,906	\$ 17,145	\$ 289,996	\$ 37,500	\$ 500,380
Daly City	101,920	\$ 848,752	NA	\$ 467,147	\$ 145,875	\$ 803,770	\$ 837,507	\$ 1,428,037
East Palo Alto	28,366	UA	\$ 502,376	\$ 440,944	\$ 137,693	\$ 516,774	\$ 218,967	\$ 1,378,820
Foster City	30,790	UA	\$ 545,306	\$ 411,570	\$ 128,520	\$ 364,068	\$ 75,000	\$ 1,374,464
Half Moon Bay	11,415	UA	\$ 202,165	\$ 61,033	\$ 19,059	\$ -	\$ 37,500	\$ 244,757
Hillsborough	10,927	UA	\$ 193,523	\$ 21,174	\$ 6,612	\$ 45,116	\$ 117,436	\$ 148,988
Menlo Park	32,319	\$ 644,000	NA	\$ 307,544	\$ 96,036	\$ 1,973,609	\$ 401,649	\$ 2,619,540
Millbrae	21,714	\$ 870,000	NA	\$ 120,815	\$ 37,727	\$ 539,542	\$ 330,932	\$ 1,237,152
Pacifica	37,526	UA	\$ 664,604	\$ 161,019	\$ 50,281	\$ 3,749	\$ 322,515	\$ 557,138
Portola Valley	4,391	UA	\$ 77,767	\$ 34,327	\$ 10,719	\$ 59,324	\$ 75,000	\$ 107,137
Redwood City	77,712	\$ 550,000	NA	\$ 807,367	\$ 252,114	\$ 2,293,382	\$ 338,278	\$ 3,564,585
San Bruno	41,842	\$ 587,760	NA	\$ 308,582	\$ 96,360	\$ 1,001,989	\$ 593,279	\$ 1,401,412
San Carlos	28,615	\$ 611,076	NA	\$ 170,884	\$ 53,362	\$ 2,981,893	\$ 550,676	\$ 3,266,538
San Mateo	97,966	\$ 741,051	NA	\$ 605,994	\$ 189,232	\$ 2,600,889	\$ 612,922	\$ 3,524,244
SSF	64,067	\$ 1,274,067	NA	\$ 737,898	\$ 230,422	\$ 4,272,080	\$ 629,858	\$ 5,884,609
Woodside	5,336	\$ 20,728	NA	\$ 11,172	\$ 3,489	\$ 285,187	\$ 75,000	\$ 245,576
SM County	61,706	\$ 2,959,411 <sup>4</sup>	NA	\$ 339,028	\$ 105,868	\$ 1,462,555	\$ 612,166	\$ 4,254,695
<b>TOTALS</b>	<b>724,702</b>	<b>\$ 13,922,913</b>	<b>\$ 2,308,246</b>	<b>\$ 5,500,540</b>	<b>\$ 1,717,641</b>	<b>\$ 22,592,497</b>	<b>\$ 9,072,194</b>	<b>\$ 36,969,643</b>

- Notes:
- Information based on interviews with and documentation provided by Permittee staff. Current street sweeping costs included (not applicable to SMCWPPP).
  - NA – Not Applicable
  - UA – Unavailable.
  - Includes estimated future expenditures associated with Area of Special Biological Significance (ASBS) and Total Maximum Daily Load (TMDL) compliance.

## 5.0 REFERENCES

BASMAA 2008. Municipal Regional Stormwater NPDES Permit - comment letter from Donald Freitas, Chair of BASMAA Board of Directors, to Bruce Wolfe, Executive Officer of the SFBRWQCB. February 29, 2008.

Schilling, J.G. 2005. *Street Sweeping – Report No. 1, State of the Practice*. Prepared for Ramsey-Washington Metro Watershed District. North St. Paul, Minnesota. June 2005.

SMCWPPP 2014. *Integrated Monitoring Report, Part C: Pollutants of Concern Load Reduction*. Prepared for the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) by EOA, Inc. March 15, 2014.

DRAFT

**STORMWATER QUALITY FUNDING INITIATIVE**

**TASK 1 REPORT:  
CURRENT AND FUTURE PROGRAM COST ANALYSIS**

**APPENDIX A**

Stormwater Quality Funding Initiative Project  
Municipal Interview

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The following questions are provided as a guideline to prepare staff for the types of questions that will be asked during the interview process.

**Stormwater Program Funding and Accounting**

1. Funding Sources

- What are sources of funding for your local stormwater program? Please name them and the amount(s) that you receive from them.
- Does your agency currently assess property-related fees associated with stormwater management? How are collected fees allocated to different elements of your program? Describe the prioritization process and its relationship to MRP requirements.
- Do you collect fees associated with stormwater related plan review? Are inspection fees collected?
- Are fees collected for conducting industrial/commercial facility inspections?
- Are fees collected for erosion control plan review and inspection?

2. Program Accounting

- In what manner does your agency account for and track funding used for stormwater management?
- Does your agency account for funding related to stormwater management separately from other municipal activities/programs? Does your agency account/track based on specific types of stormwater elements/activities (e.g., corporation yard maintenance, catch basin cleaning, street sweeping, development plan review and inspection, etc.)?

3. Stormwater Program Expenditures

- What were the expenditures for a program year?
- What were the expenditures for each program element for a program year?
- How much do you spend on your annual reporting effort?
- How is street sweeping funded?



Stormwater Quality Funding Initiative Project  
Municipal Interview

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**Costs Specific to Permit Provisions**

Municipal Operations (C.2)

1. Do you have a budget line item for Public Works/Maintenance expenses specifically related to stormwater NPDES permit implementation?
2. Does your agency account for staff hours and/or costs for implementing Municipal Operation BMPs and associated training (street and road repair and maintenance, sidewalk/plaza maintenance and pavement washing, bridge and structure maintenance and graffiti removal)?
3. What are the costs associated with implementing rural road BMPs (Including tracking and maintaining)?
4. Does your agency account for staff hours or costs associated with pump station requirements (dry and wet weather monitoring and inspections)?
5. Have you budgeted for potential capital or maintenance expenses to implement corrective actions arising from DO data collection results?
6. Is there a separate budget for implementing the corporation yard SWPPP and inspections?
7. Do you coordinate with sanitary sewer agencies to dispose of wastewater from municipal activities?
8. How many storm drain inlets are in your jurisdiction?
9. How are inlet markings accomplished? Can the previous/current level of effort be estimated?
10. Is there an added cost for inspecting and maintaining storm drain inlet markers and tracking these activities?

New Development and Construction Controls (C.3)

1. Has your agency updated development application forms/information provided to project applicants in order to address new requirements in the MRP? What was the budget/estimate for that?
2. How are stormwater reviews of development applications for private projects funded?
  - a. Were new fees adopted or were related application fees increased?
  - b. How many hours/FTEs are estimated for C.3 compliance review?
  - c. Do you have a specific C.3 review fee or is a portion of the development fees applicable to C.3?
3. Can you estimate the hours spent by planning counter staff educating applicants about the C.3 requirements?
4. How do you budget for and perform plan review and site inspections of the construction of C.3 facilities, for private development projects and for capital projects?
5. How does your agency fund review of municipal public works projects for C.3 compliance? Can you estimate the hours/FTEs for this?

Stormwater Quality Funding Initiative Project  
Municipal Interview

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6. Is your agency implementing any Green Streets projects? How are they funded and does that funding include the costs of grant writing, managing the project, and long-term maintenance of the stormwater treatment measures?
7. Has your municipality considered tracking and "banking" impervious area that has been provided with LID retrofit, which could be used for alternative compliance for public works projects or possibly for private projects? What are the obstacles to alternative compliance?
8. How is your O&M inspection and verification program budgeted and paid for? Please describe any fees your agency has that are used for this purpose. If costs are projected to increase, due to increasing numbers of treatment facilities being constructed, how does the agency plan to cover increasing costs?
9. What method or system do you use to track O&M verification inspections? Are there plans to amend your agency's O&M verification inspection tracking system? If so, how will the effort be budgeted?
10. How is the agency implementing plan review of small projects subject to Provision C.3.i site design requirements? Is a fee planned, or will it be absorbed into the current budget? What do you anticipate the level of effort will be?

Industrial and Commercial Site Controls (C.4)

1. How many industrial and commercial sites in your jurisdiction receive stormwater inspections?
2. Does your agency contract for industrial/commercial inspections? If so, does your agency contract for all inspections or are there still businesses your agency must inspect?
3. If your agency contracts for industrial/commercial inspections, what are the services contracted for and the budget allocated?
4. How many staff hours are required for managing the list of facilities and planning future inspections?
5. How many business inspection activities are tracked and what is the cost of the tracking and reporting?
6. Has incorporating PCBs into businesses inspections affected the cost?

Illicit Discharge Detection and Elimination (C.5)

1. Who on agency staff is responsible for (1) surveillance, (2) investigation, (3) response, (4) follow-up outreach and enforcement?
2. How is the cost of these activities tracked and budgeted?
3. How are incidents tracked? What is the cost of maintaining these records and of preparing reports?
4. Are administrative fines issued for stormwater violations?
5. Are storm drain surveys conducted as part of public works maintenance activities?

Stormwater Quality Funding Initiative Project  
Municipal Interview

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6. Is the storm drain system mapped and the maps revised as needed?

Construction Inspection (C.6)

1. How many active construction sites are typically located in your jurisdiction each year?
2. Who is responsible for enforcement of compliance with erosion control and other construction site stormwater compliance requirements for private and for public projects? Is staff time separately budgeted for NPDES permit-related work?
3. How are construction site NPDES compliance inspections of private sites funded? Is a portion of construction permit and/or grading permit fees allocated to NPDES permit compliance?
4. Is review of Erosion Control Plans submitted by project applicants budgeted separately? If not, can the level of effort be estimated as a proportion of total FTEs needed perform the project approval process?
5. Are inspections for erosion control/construction site stormwater compliance tracked or budgeted separately? If not, can the level of effort be estimated as a proportion of total FTEs?
6. Has staff estimated the additional effort that is required to track violations and ensure that they are corrected within 10 days?
7. How are construction inspections tracked and included in the annual report?

Public Outreach (C.7)

1. Does your agency have a public outreach coordinator or community liaison? Does part of their work involve stormwater NPDES outreach and education? Is this time separately budgeted or can it be estimated?
2. Does local staff engage in outreach events, including school-age children and creek groups? Is this budgeted separately or can a total FTE be estimated?
3. Does local staff support creek cleanups? Is this effort budgeted separately, or can a number of FTEs be estimated?

Pesticides (C.9)

1. Can the cost of IPM training and certification be estimated?
2. Are there costs associated with the IPM purchasing policy?
3. Are there other costs associated with implementing the IPM Policy or Ordinance?
4. Do you contract out landscape or structural pest control activities?

Stormwater Quality Funding Initiative Project  
Municipal Interview

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Trash (C.10)

1. What are the agency's plans for meeting the trash reduction requirements in the MRP? What types of activities is your agency planning to implement to achieve short and long-term trash load reduction goals?
2. What was the estimated cost for producing the short-term trash reduction Plan?
3. What is the estimated cost estimate for producing the long-term trash reduction plan?
4. Is there a placeholder or other budget figure for the cost of implementing trash reduction actions?
5. What are your agency's costs of selecting, designing, fabricating, and installing/constructing full capture devices designed to meet the MRP full capture treatment requirement? How much of these costs were or will be offset by grant funds (e.g., SFEP/ARRA grant funding)?
6. Does your agency have a budget for installing devices in the future?
7. What were the costs of identifying and selecting trash hot spots? What are the annual costs for cleaning creek/shoreline trash hot spots?

C.13.a (Architectural Copper)

1. Has your agency dedicated any additional staff time to implementing and enforcing implementation of the new BMPs for the installation of architectural copper? If so, is this time budgeted separately?

Exempt Discharges (C.15)

1. Does your agency own or operate any groundwater discharges, and if so, are there costs associated with compliance per Provision C.15.b?
2. Is your agency a water purveyor? If yes, what are the costs associated with monitoring, data tracking and reporting planned and unplanned discharges from your potable water system? (C.15.b.iii)
3. What is the cost of keeping records of the authorized major discharges of dechlorinated pool, hot tubs, spa and fountain water to the storm drain? (C.15.b.v.(2))
4. What is the cost of maintaining records of new pumped groundwater, foundation drains, and water from crawl space pumps and footing drains discharges not related to single family residents that are discharged to the storm drain?