

Attachment B - County  
COST IMPLICATIONS OF MUNICIPAL REGIONAL PERMIT (MRP) COMPONENT HIGHLIGHTS

Provision	Components	Current	Proposed	Implementation Dates	Current Cost	Estimated Cost by Year					Policy Implications
						FY09/10	FY10/11	FY11/12	FY12/13	FY13/14	
<b>C.2</b>	<b>MUNICIPAL OPERATIONS</b>										
C.2.a	STREET SWEEPING	Public curbed streets swept once a month.	Street sweeping requirement removed (but still implicitly required to reduce pollutants to the maximum extent practicable as well as explicitly in C.11 and C.12). All wash water is prohibited from being discharged to the stormdrain system, and must be captured on site and disposed of through other means.	N/A	\$160,000	\$160,000	\$160,000	\$160,000	\$160,000	\$160,000	Sections C.11.d and C.12.d imply that continuing street sweeping is expected, though it is no longer explicitly required by the permit. Since current levels of street sweeping contribute to current levels of water quality, this permit implicitly requires that the County continue to conduct this activity.  The County will presumably continue to provide current levels of street sweeping service.
C.2.b	SIDEWALK/PLAZA CLEANING	Use BMP's Bay Area Stormwater Management Agencies Association (BASMAA) mobile surface cleaning certification program to reduce pollutants.	Coordinate with sanitary sewer agencies to determine if disposal to sanitary sewer is available.		\$0	\$40,000	\$40,000	\$40,000	\$40,000	\$40,000	May result in reduction in cleaning of public spaces.
C.2.c	BRIDGE AND STRUCTURE MAINTENANCE AND GRAFFITI REMOVAL		(1) Implement BMPs to prevent polluted stormwater and non-stormwater discharge from bridges and structural maintenance activities directly over water or into storm drains  (2) Implement BMPs to prevent pollution associated with graffiti removal.		\$0	\$40,000	\$40,000	\$40,000	\$40,000	\$40,000	
C.2.f	CATCH BASIN CLEANING	Inspect and clean (if necessary) once a year.	Catchbasin cleaning requirement removed (but still implicitly required).	N/A	\$775,000	\$775,000	\$775,000	\$775,000	\$775,000	\$775,000	Sections C.11.d and C.12.d imply that continuing catch basin cleaning is expected, though it is no longer explicitly required by the permit. Since current levels of catch basin cleaning contribute to current levels of water quality, this permit implicitly requires that the County continue to conduct this activity.  The County will presumably continue to provide current levels of catch basin cleaning.
C.2.d	STORMWATER PUMP STATIONS	Inspect and clean at least once a year.	(1) Establish inventory of all pump stations in jurisdiction (2) Inspect and collect dissolved oxygen data from all pump stations twice a year during the dry season beginning 2010; (3) If dissolved oxygen content is at or below 3 mg/L apply corrective actions; (4) Inspect pump stations in the first business day after ¼-inch within 24 hour and larger storm events.	Inventory 11/1/2009 Inspections 2010	\$45,000	\$75,000	\$90,000	\$90,000	\$90,000	\$90,000	Assumes that sanitary districts will be willing/able to cooperate.
C.2.e	RURAL PUBLIC WORKS CONSTRUCTION AND MAINTENANCE	None	(1) Consider potential impacts water quality (erosion potential, slope steepness, stream habitat resources) when prioritizing projects. road project, consistent with Provision C.3 requirements of this Order. (2) Develop BMPs for erosion and sediment control during and post construction for rural roads. (a) Implement a pre-rainy season inspection program for rural roads to prevent impacts on water quality. (b) Increase maintenance on rural roads adjacent to streams and riparian habitat to prevent impacts to water quality. (c) Ensure that replaced/new culverts and bridge crossings do not impede fish passage or impact natural stream geomorphology.		\$260,000	\$350,000	\$350,000	\$350,000	\$350,000	\$350,000	If new/additional funding is not developed, will result in reduction in the number of annual road maintenance projects (more deferred maintenance).
			<b>Subtotal</b>		<b>\$1,080,000</b>	<b>\$1,280,000</b>	<b>\$1,295,000</b>	<b>\$1,295,000</b>	<b>\$1,295,000</b>	<b>\$1,295,000</b>	

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C.3	NEW DEVELOPMENT AND REDEVELOPMENT				† These estimates only account for additional costs associated with MRP (excludes cost of public projects under current permit). Project costs vary. No projects incorporating permanent stormwater management facilities have been completed to date.						
C.3.b	REGULATED PROJECTS	(1) Public and private projects that create and/or redevelop at least 10,000 square feet of impervious surface area to install permanent stormwater management facilities (PSWMFs) to treat runoff and control its flow rate, and requires the operation and maintenance of the PSWMFs in perpetuity. 2) Exception for most road re-construction.	(1) Threshold for PSWMF requirements reduced to 5,000 square feet of new/redeveloped impervious surface area for certain projects. (2) Expanded requirement for some "new" road projects to install PSWMFs; eliminates requirement for road reconstruction projects to install PSWMFs. (3) Private projects will be "grandfathered" only if all "final, staff-level discretionary approvals" have been granted prior to effective dates in NPDES permit. (4) Public projects will be "grandfathered" only if funds have been committed and project is scheduled to begin prior to effective dates in NPDES permit.	7/1/10 ("Special Land Uses" dropped to 5,000 square foot threshold)  Immediate ("New Road Projects")	currently limited to planning and design stage; the County has yet to install any PSWMFs).  Estimated annual costs of designing and installing PSWMFs as required by the current permit are provided at right.  This only evaluates costs for Public Works Projects (excludes General Services Department projects, which will vary more than Public Works Department costs).  *Private development related costs borne by developers.	Estimated Cost Under Current Permit: \$2,300,000  MRP: \$2,800,000	Estimated Cost Under Current Permit: \$2,900,000  MRP: \$3,400,000	Estimated Cost Under Current Permit: \$2,600,000  MRP: \$2,900,000	Estimated Cost Under Current Permit: \$3,300,000  MRP: \$3,600,000	Estimated Cost Under Current Permit: \$3,300,000  MRP: \$3,700,000	Increased development costs. More new projects will incorporate permanent stormwater management facilities; owners will be required to maintain the facilities in perpetuity.  Increased public project design/construction costs. Will result in decrease in "new" road construction projects (this includes expansions), if additional funding is not developed. Provides disincentives to providing bicycle lanes and sidewalks for some projects.  Higher percentage of road construction and expansion projects will be required to incorporate permanent stormwater management facilities; the County will be required to maintain these facilities in perpetuity. "Regulated Projects" (that meet definitions/thresholds for requirement to comply with Provision C.3) that have already been deemed complete, but have not received "final, staff-level discretionary approval," will be required to comply with C.3. This will affect projects that have yet to receive final discretionary approval, including those projects that have been working toward compliance with C.3 pursuant to the existing permit, and projects that were "grandfathered" under the existing permit because they were deemed complete prior to the effective date of C.3 (existing permit). This will require the County to modify recommended conditions of approval for projects that have already received final recommended conditions but have not been granted final discretionary approval, and to require compliance for projects that are "grandfathered" under the current permit.  Will result in decrease in road construction and rehabilitation projects, if additional funding is not developed. Increased cost for design and construction of stormwater management facilities for public projects that have already been scheduled by effective date, but have not been scheduled to begin by the effective date.
C.3.e	ALTERNATIVE COMPLIANCE with PROVISION C.3.b	Allows for a wide variety of projects to provide "alternative compliance" with C.3, including offsite treatment of equivalent amounts of runoff, and contributing to regional treatment projects. Some require review and approval of alternative compliance regime (by the Water Board).	Facilitates alternative compliance for certain Transit-Oriented Development, Affordable Housing, and Infill Projects (but with severe restrictions).  Disallows alternative compliance for all other project types.	7/1/10	N/A	*See note (right column)	*See note (right column)	*See note (right column)	*See note (right column)	*See note (right column)	Eliminates a potentially more economic means of complying with C.3 for many public and private projects. Disallowing alternative compliance does not necessarily benefit water quality any more.  Will cause severe problems with complying with C.3 for certain road projects, by effectively requiring needlessly complicated engineering to treat stormwater from the impervious surface being created, and requiring on-site treatment. This will be especially problematic in urbanized areas, areas without any drainage infrastructure, and areas with severe topographic constraints.  It is not possible at this time to provide a reasonable estimate of the cost increase for County road projects due to the elimination of the alternative compliance option. Some projects C.3 compliance costs (in C.3 tables below) will be dramatically increased; some projects may become physically or financially infeasible.

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C.3.h	OPERATION AND MAINTENANCE OF STORMWATER TREATMENT SYSTEMS	<p>All Permanent Stormwater Management Facilities (PSWMFs) must be operated and maintained in perpetuity.</p> <p>County is required to verify that PSWMFs serving privately development projects are adequately operated and maintained by the property owners; Community Facilities District (CFD) No. 2007-1 will provide a funding source for County oversight of the maintenance of private PSWMFs.</p> <p>The County will be responsible for operation and maintenance of PSWMFs installed on County projects.</p>	No significant changes.		<p>†*County has not installed any PSWMFs to date.</p> <p>Estimated annual costs of operating and maintaining PSWMFs as required by the current permit are provided at right.</p> <p>Solely inclusive of costs relative to PSWMFs developed by the Public Works Department (see note regarding General Services District, above (C.3.b)).</p>	<p>Estimated Cost Under Current Permit: \$0</p> <p>MRP: \$0</p>	<p>Estimated Cost Under Current Permit: \$45,000</p> <p>MRP: \$55,000</p>	<p>Estimated Cost Under Current Permit: \$130,000</p> <p>MRP: \$150,000</p>	<p>Estimated Cost Under Current Permit: \$160,000</p> <p>MRP: \$190,000</p>	<p>Estimated Cost Under Current Permit: \$180,000</p> <p>MRP: \$220,000</p>	<p>Requirement to install more PSWMFs and more complicated PSWMFs (per other sections of C.3) will increase costs of operating and maintaining PSWMFs. As the County installs more PSWMFs, the increased expense of operating and maintaining the PSWMFs will be magnified.</p>
C.3.i	REQUIRED SITE DESIGN MEASURES FOR SMALL PROJECTS AND DETACHED SINGLE-FAMILY HOME PROJECTS	<p>Incorporate stormwater treatment to "maximum extent practical."</p>	<p>Provides a list of 6 site design measures, one of which must be incorporated into every development project (requiring permits) that create and/or replace between 2,500 and 10,000 square feet of impervious surface.</p>	7/1/12	<p>\$0</p> <p>*Private development related costs to be borne by developers.</p>	\$0	\$0	\$75,000	\$75,000	\$75,000	<p>Adds a potentially expensive requirement to many private development projects. None of the listed site design measures may be feasible for certain development sites.</p> <p>Site design features presumably must be inspected.</p>
Subtotals				* Current cost shown as average	\$2,983,000	\$2,800,000	\$3,455,000	\$3,125,000	\$3,865,000	\$3,995,000	
C.4 INDUSTRIAL AND COMMERCIAL SITE CONTROLS											
C.4.a	LEGAL AUTHORITY FOR EFFECTIVE SITE MANAGEMENT	<p>Inspect restaurants and auto related business at least once every five years. Work with them to improve practices. Enforcement for blatant violators is handled by the DA's office.</p>	<p>(1) Legal authority to oversee, inspect, and require expedient compliance and pollution abatement at all industrial and commercial sites which may be reasonably considered to cause or contribute to pollution of stormwater runoff.</p> <p>(2) Violations corrected prior to next rain event or within 10 business days after violations are noted.</p> <p>(3) Develop and implement a prioritized inspection workplan.</p> <p>(4) Annually update and maintain a list of priority facilities to inspect.</p> <p>(5) Develop and implement an Enforcement Response Plan for inspection staff to take consistent actions to achieve compliance from all public and private construction site operators.</p> <p>(6) Train inspectors annually.</p>	<p>10/15/2010 Inspection Plan</p> <p>Subsequent increased inspections.</p>	\$400,000	\$450,000	\$550,000	\$550,000	\$550,000	\$550,000	<p>Requires County to enforce State General Permit provisions. Expands County responsibility to include businesses that already have coverage under the State General Permit.</p>
Cost Totals					\$400,000	\$450,000	\$550,000	\$550,000	\$550,000	\$550,000	



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<b>C.5</b>	<b>ILLCIT DISCHARGE DETECTION AND ELIMINATION</b>										
			(1) Legal authority to prohibit and control illicit discharges and escalate stricter enforcement to achieve compliance. (2) Defines a range of illicit discharges to be addressed (though County responsibility is not limited to those discharges. (3) Perform routine inspections in an attempt to locate violators or potential violators. Conduct dry weather surveys (at least one per square mile , excluding open space) in an effort to locate illicit discharges. Create a map and a report of all investigations (including dry weather surveys) and make information available to the public. (4) Develop Enforcement Response Plan defining procedures for responding to illicit discharges, providing for escalating enforcement responses. (5) Develop a database (or "tabular system") to record illicit discharge control activities. (6) Increases oversight of Mobile Sources (i.e. power washing, carpet cleaning).	4/1/10	\$200,000	\$300,000	\$350,000	\$350,000	\$350,000	\$350,000	County role will shift from oversight and assistance to enforcement, punishment, and cleanup.  County may need to expand authority to utilize escalating penalties for illicit discharges, and may need to change procedures to require cease and desist.  Requires County to regularly patrol for NPDES violations.
		Respond to reports of illicit discharges and conduct enforcement activities. Report to RWQCB.									
					<b>\$200,000</b>	<b>\$300,000</b>	<b>\$350,000</b>	<b>\$350,000</b>	<b>\$350,000</b>	<b>\$350,000</b>	
<b>C.6</b>	<b>CONSTRUCTION SITE CONTROL</b>										
		(1) Require erosion and sediment controls on active construction sites between October 1st and April 30th. Inspection conducted in conjunction with grading operations; (2) Require plans for erosion and sediment controls (stormwater pollution prevention plan – SWPPP). Inspect construction sites (as part of normal business) to make sure no sediment is discharged at the construction site (as needed).	(1) Requires seasonally- and project-appropriate pollution controls (in six categories, not only erosion and sediment control) be in place at construction sites. (2) Requires development of prescriptive Enforcement Response Plan detailing procedures for escalating enforcement activities on sites that do not provide adequate construction site pollution control. (3) Provides for designation of high-priority sites (which may be designated by the Water Board), with increased inspection requirements. (4) Detailed reporting requirements.		*\$0  *Excluded - currently funded entirely by development permit fees; anticipated additional costs shown at right.	\$30,000	\$20,000	\$20,000	\$20,000	\$20,000	Increases costs for public and private construction projects (primarily to be borne by developers).  Increases tracking/reporting expenses for County.
			<b>Cost Totals</b>			<b>\$30,000</b>	<b>\$20,000</b>	<b>\$20,000</b>	<b>\$20,000</b>	<b>\$20,000</b>	
<b>C.7</b>	<b>PUBLIC INFORMATION AND OUTREACH</b>										
		(1) 90% of public stormdrain inlets need to be marked "no dumping" and markers shall be maintained as necessary. (2) No Requirement (3) Participate in or conduct at least eight outreach events per year. (4) Unchanged. (5) No requirement, but we do currently fund and promote this.	(1) 80% of municipally-maintained stormdrain inlets shall be marked by end of permit. 80% of inlet markers shall be inspected and maintained at least once every 5 years. (2) Two advertising campaigns (trash and pesticides) with pre- and post-campaign surveys of the public. (3) Annually participate in and/or host 5 public outreach events and 2 citizen involvement events. (4) Encourage and support watershed stewardship collaborative efforts of community groups. (5) Annually conduct outreach activities targeted towards school age children.	(1) 10/15/2013 Completion (2) 7/1/2009-end of permit (3) 7/1/2009 (4) 7/1/2009 (5) 7/1/2009	\$460,000	\$500,000	\$500,000	\$500,000	\$500,000	\$500,000	
			<b>Cost Totals</b>		<b>\$460,000</b>	<b>\$500,000</b>	<b>\$500,000</b>	<b>\$500,000</b>	<b>\$500,000</b>	<b>\$500,000</b>	



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C.8	WATER QUALITY MONITORING										
		None (Current volunteer monitoring program fulfills future bioassessment requirements).	Requires San Francisco Estuary Receiving Water Monitoring contribution to Regional Monitoring Program Requires Status Monitoring of 8 watershed in CCCounty including: (1) 10 bioassessments w/physical habitat and general water chemistry per year (2) Chlorine at 10 sites twice per year. (3) Nutrients at 10 sites 3 times per year in conjunction w/ algae & water column toxicity (4) General water quality at 2 sites / year at 15 min. intervals from June - Sept. (5) Temperature at 4 sites / year at 60 min. intervals from April - Sept. (6) Diazinon and chlorpyrifos at two sites twice per year. (7) Toxicity in bedded sediment five sites per year. (8) Pollutants in bedded sediment five sites per year. (9) Pathogen indicators five sites per year. (10) Stream survey six stream miles per year. Long Term Monitoring of Kirker or Walnut Creek to include metals, organics, suspended sediments, toxicity and Monitoring Projects: (1) Stressor/Source identification (2) BMP Effectiveness Investigation (3) Geomorphic Project Pollutants of Concern Monitoring to develop waste load allocations for TMDL's at Rheem Creek and Walnut Creek four times per year for Copper, Mercury, Methyl Mercury, PCB's, Suspended Sediments, Total Organic Carbon and twice in Years 2 and 4 for Selenium, PBDE's, PAH, Chlordane, DDT's, Dieldrin, Nitrate, Pyrethroids, Phosphorous and Speical Projects: (1) Sediment Delivery Estimate/Budget	Various deadlines for different requirements.	\$15,000	\$275,000	\$350,000	\$325,000	\$360,000	\$330,000	Developing data for potential future TMDLs (Total Maximum Daily Loads); traditionally a State responsibility.  Significant costs placed upon County that would traditionally have been borne by the Water Board.
			Cost Totals		\$15,000	\$275,000	\$350,000	\$325,000	\$360,000	\$330,000	
C.9	PESTICIDES TOXICITY CONTROL										
		Integrate IPM to the Maximum Extend Practicable (MEP).	(1) Adopt Integrated Pest Management (IPM) Policy or Ordinance (2) Require use of IPM in municipal operations (3) Train County employees in IPM (4) Require County-hired contractors to implement IPM (5) Track and Participate in Regulatory Processes (6) Require agricultural businesses to implement IPM (7) Evaluate source control actions (8) Conduct additional public outreach promoting IPM	7/1/2010 IPM Policy and Ordinances  7/1/2010 County/Contractors Implement IPM	\$25,000	40000	\$120,000	\$120,000	\$120,000	\$120,000	Review IPM ordinance/policies for compliance with new requirements.  Require IPM-certified contractors.  Outreach to pesticide sellers/users.
			Cost Totals		\$25,000	\$25,000	\$120,000	\$120,000	\$120,000	\$120,000	

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C.10	TRASH REDUCTION										
			(1) Identify 5 Trash Hot Spots within creeks in the County's jurisdiction (subject to review/approval by Water Board). Conduct 2 annual trash surveys to monitor trash levelsat each Trash Hot Spot. Reduce level of trash impairment at Trash Hot Spots to below 100 pieces of trash within 100 foot assessment reach of creek.  (2) Install "Full Trash Capture Devices" (FTCD) which must trap all particles retained by a 5mm (0.2 inch) mesh screen. FTCDs must be installed to capture trash from 157 acre catchment area (MRP specifies an area equivalent to 30% of the County's Retain/Wholesale Commercial Land (per ABAG 2005 Land Use Survey)). Operate and maintain FTCDs.  (3) Prepare a plan to entirely eliminate trash impacts on waterways by 2024.	7/1/2012 Trash Hot Spots' level of trash impairment must be reduced to below 100 pieces of trash per 100 foot assessment reach.  2/1/2010 Propose Trash Hot Spots  7/1/13 FTCD Installation Complete  10/15/2013 Report on Long Term Plan to Eliminate Trash Impacts							Substantial costs to County associated with implementing FTCDs; ongoing costs of maintaining FTCDs.  Increased costs to businesses and increased enforcement.  Encourages passage of new ordinances to reduce trash (i.e. litter control, illegal dumping, bans on styrofoam / plastic bags.)  Implicitly encourages County to eliminate homeless persons' contribution to trash impacts (i.e. removal of homeless encampments near waterways).  Requires development of an unachievably ambitious plan to entirely eliminate trash impacts, which would require require activity by the County well in excess of what is possible.  Does not adequately address the facts that trash sources within one jurisdiction may cause a waterway within a neighboring jurisdiction to become impaired with trash, and that it may not be possible for the trash-receiving municipality to address trash sources located outside of its jurisdiction.
		None			\$225,000	\$360,000	\$450,000	\$1,850,000	\$1,750,000	\$350,000	
			Cost Totals		\$225,000	\$360,000	\$450,000	\$1,850,000	\$1,750,000	\$350,000	
C.11	MERCURY CONTROLS										
			Implement urban runoff requirments of the mercury TMDL to reduce mercury loads. Develop allocation sharing scheme with Caltrans. Conduct pilot projects to evaluate on-site stormwater treatment via retrofit. Conduct pilot projects to evaluate and enhance municipal sediment removal and management practices. Divert dry weather and first flush flows to POTWs. Conduct fate and Transport Study of Mercury in urban run-off. Develop a risk reduction program throughout the region. Conduct pilot projects to investigate and abate mercury sources in drainages. Develop and implement a mercury collection and recycling program.	7/1/09	\$0	\$10,000	\$15,000	\$25,000	\$25,000	\$25,000	Requires cooperation with sanitary sewer districts and CalTrans (and potentially ties our compliance with their willingness to cooperate).
		None									
			Cost Totals		\$0	\$10,000	\$15,000	\$25,000	\$25,000	\$25,000	
C.12	PCB CONTROLS										
			Implement urban runoff requirments of the PCB TMDL to reduce PCB loads. Implement regional project for PCB containing equipment identification and reporting during industrial inspections. Conduct pilot projects to evaluate management of PCB containing wastes during demolition and renovation. Conduct pilot projects to investigate and abate on-land locations w/elevated PCBs. Conduct pilot projects to evaluate and enhance municipal sediment removal and management practices. Divert dry weather and first flush flows to POTWs. Conduct Fate and Transport Study of PCBs in urban run-off. Develop a risk reduction program throughout the region.	7/1/09	\$0	\$20,000	\$25,000	\$30,000	\$30,000	\$30,000	Requires cooperation with sanitary sewer districts and CalTrans (and potentially ties our compliance with their willingness to cooperate).
		None									
			Cost Totals		\$0	\$20,000	\$25,000	\$30,000	\$30,000	\$30,000	



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C.13	COPPER CONTROLS										
		None	Ensure proper management of wastewater from copper features and discharges from pools, spas and fountains. Ensure that construction projects and industrial facilities do not discharge copper. Requirement to participate in non-profit Brake Pad Partnership (intended to phase copper out of brake pads). Conduct technical studies of copper toxicity in sediments and on samonids.	7/1/2010 Report to certify adequate legal authority	\$0	\$30,000	\$20,000	\$20,000	\$20,000	\$20,000	Increased development costs. Requires adoption of ordinance. Increased restrictions on use of private property. Increased enforcement.
			Cost Totals		\$0	\$30,000	\$20,000	\$20,000	\$20,000	\$20,000	
C.14	PDBE'S, LEGACY PESTICIDES AND SELENIUM										
		None	Gather concentration and loading information on pollutants of concern for which TMDLs are planned including PBDEs, DDT, dieldrin, chlordane, selenium. Develop a program to identify, and manage controllable sources of these contaminants found in urban runoff.	7/01/09 w/progress report in 2010 Annual Report	\$0	\$10,000	\$15,000	\$20,000	\$20,000	\$20,000	Increased costs to businesses that utilize identified chemicals. May increase County's level of involvement in business and residential activities that involve these chemicals.
			Cost Totals		\$0	\$10,000	\$15,000	\$20,000	\$20,000	\$20,000	
C.15	EXEMPTED AND CONDITIONALLY EXEMPTED DISCHARGES										
C.15. b	CONDITIONALLY EXEMPTED DISCHARGES	Non-specific requirements to oversee conditionally-exempt discharges.  (*Interim guidance released by the Water Board has established oversight of potable water discharges.)	Sets forth categories of conditionally exempt non-stormwater discharges that may only be allowed by the County if the County ensures that required BMP's and control measures are implemented: (1) Pumped groundwater, foundation drains, water from crawl space pumps and footing drains. (2) Air conditioning condensate (3) Discharges of potable water (requires oversight of Water Agencies). (4) Emergency discharges (requires over site of Fire District). (5) Swimming Pools and Irrigation Requires the County to track, monitor, and report these discharge types.	7/1/10	\$10,000	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000	Restrictions on use of private property. The County is expected to regulate existing and new facilities (foundation drains, pools, etc.); the County has not developed comprehensive records of which properties have such facilities.  Expands County oversight/regulation/enforcement responsibility for homeowners and businesses, as well as fire districts and water providers.  (1, 2, 5) Requires County to oversee/regulate several types of previously exempted discharges that are now conditionally exempted.  (3, 4) Requires County to develop authority to oversee discharges by the Fire Districts and Water Agencies, and to subsequently exercise this authority.  Onerous requirements, with no implementation dates (assumed that implementation must be immediate).
			Cost Totals		\$0	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000	
Misc*	COUNTY WATERSHED PROGRAM ADMINISTRATION	Inclusive of all activities currently conducted through County Watershed Program (i.e. NPDES permit administration, tracking activities, serving as clearinghouse for NPDES compliance information, preparation of annual reports to RWQCB, drafting NPDES-related ordinances, etc.)	Heightened levels of activities conducted by County Watershed Program required to maintain compliance with MRP.		\$500,000	\$1,000,000	\$1,000,000	\$1,000,000	\$1,000,000	\$1,000,000	



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TOTAL ESTIMATED MRP COSTS					\$5,888,000	\$7,190,000	\$8,265,000	\$9,330,000	\$10,005,000	\$8,705,000	\$43,495,000

NOTES:

- \* Note costs listed above as excluded from cost calculations.
- \* All future costs estimated in 2008 dollars, with no adjustment for inflation.
- \* Capital costs annualized when not specified by implementation dates.
- \* Costs are specific to NPDES compliance-related portions of County activities.
- \* For provisions where implementation dates are not specified, assume implementation date of July 1,2008 or upon issuance of permit.
- \* Assume for costs near high end of anticipated range.
- \* Excluded are a number of pilot projects (that would occur in one or more municipalities) that are required to be conducted either on a County-level or a Region-wide level. It is not known whether any of these projects would be undertaken by the County; if so, grant funding will be pursued.