Working Draft Proposed Standardized Cost Reporting Categories for Statewide Phase II Small MS4 NPDES Stormwater Permit Reissuance

For the Phase II Small MS4 NPDES Stormwater Permit reissuance (now under development), State Water Board's Strategy to Optimize Resource Management of Stormwater (STORMS) unit proposes a simple cost reporting program ONLY for traditional Phase II permittees. No standardized cost reporting method is proposed for non-traditional Phase II permittees at this time.

Below are proposed standardized cost reporting categories for traditional Phase II permittees and description of each categories.

Table 1: Cost Reporting Categories for Traditional Phase I	I Permittees

Cost Category	Cost Type
Overall stormwater program	Personnel Cost
management and administration	Consultant Cost
cost	Overhead Cost
Capital cost	Personnel Cost
	Consultant cost
	Equipment cost
	Land cost
	Materials cost
	Overhead Cost
Operation and maintenance cost	Personnel cost
	Consultant cost
	Overhead cost
Water quality monitoring cost	Sampling Cost (Personnel and Consultant)
	Sample Analysis Cost
Miscellaneous cost	-

1. Overall stormwater program management and administration cost

This category should include costs associated with permit compliance administration and management activities; development of a stormwater management plan; stormwater program budget planning and management; asset management; reporting activities required by permits, including annual report preparation and submission; GIS mapping and database; staff training; and overall program effectiveness assessment. Additionally, expenditures related to coordination with program stakeholders, including regional water boards, State Water Board, and co-permittees should be reported under this category. Costs should be divided into personnel costs, consultant costs, and overhead costs.

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2. Capital cost

Costs associated with building new structural stormwater control measures or other tangible assets required to comply with the permits should be included under this category. Such costs should be divided into personnel cost, consultant costs, equipment cost, land costs, and materials cost.

3. Operation and maintenance cost

Costs associated with carrying out permit-mandated routine operational and maintenance activities should be reported here. Such activities include implementing minimum control measures, including non-structural best management practices, public engagement and outreach, illegal discharge detection and elimination, spill prevention and response, structural BMP maintenance, industrial and commercial facilities management, construction site management, trash management, and any other special programs triggered by the MS4 permit. The costs should be divided into personnel costs, consultant costs, and overhead costs.

4. Water quality monitoring

All expenditures related to permit-mandated monitoring should be reported under this category. This may include receiving water monitoring, TMDL monitoring, ASBS monitoring, stormwater BMP monitoring, or outfall monitoring. Monitoring costs should be divided into personnel cost, consultant cost for sampling (if applicable), and sample analysis costs (laboratory analysis, data analysis, and quality assurance).

Miscellaneous cost

Expenditures that are directly related to permit implementation but do not fall under any of the categories described above should be reported as miscellaneous costs.

Cost reported under each category must be mutually exclusive and directly related to permit implementation. For program activities that fulfill multiple-purposes, then permittees should use best professional judgement to estimate the portion of the expenditures directly related to the permit requirements. Similar discretion should be used when estimating personnel costs for staff who are assigned job responsibilities beyond stormwater permit implementation.

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