SAN MATEO COUNTYWIDE
Water Pollution Prevention Program
Clean Water. Healthy Community.

SMCWPPP Cost Reporting Workshop
July 24, 2024

Stormwater Permit Cost Reporting Requirements and Framework Tool

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Presentation Overview

- Background and MRP Requirements
- Approach to Bay Area Cost Reporting Framework
- Structure of Framework
- Overview of Guidance Manual
- Key Guidance and Considerations
- Annual Reporting
- Questions & Answers

Drivers of Requirements for Cost Reporting

- EPA Clean Water Act requires fiscal analyses of permit implementation costs
- State Audit Report in 2018 found it was difficult to obtain and compare costs of stormwater permit implementation
- Guidance issued by State Water Board's Office of Water Research, Planning and Performance in 2020
  - Used as basis for new permit requirements in the LA Region, City of Salinas, and the SF Bay Area
- State Water Board has begun effort to standardize cost reporting for all municipal stormwater permittees statewide

Bay Area Municipal Regional Permit (MRP)

- Regional Phase I stormwater NPDES permit for urban areas (79 permittees):
  - San Mateo, Santa Clara, Alameda, and Contra Costa Counties, Fairfield-Suisun, and Vallejo
- Third reissuance “MRP 3.0” was adopted on May 11, 2022, and took effect on July 1, 2022
- Provision C.20 includes new cost reporting requirements

MRP 3.0 Provision C.20 Requirements

- Report costs annually, beginning with FY 2024-25.
- Specific requirements for cost reporting framework/method:
  - Report costs by program area and in specified cost categories
  - Identify costs solely to comply with MRP requirements
  - Report consistently to allow comparisons over time
  - Describe sources of funds used to meet necessary expenditures
  - Identify funding resources shared on a regional or countywide basis
  - Estimate costs for the upcoming fiscal year

MRP 3.0 Provision C.20 Requirements

Required Program Areas	
• Program management	• Pesticides control (C.9)
• Municipal operations (C.2)	• Trash load reduction (C.10)
• New development and redevelopment (C.3)	• Mercury controls (C.11)
• Industrial and commercial site controls (C.4)	• PCBs controls (C.12)
• Illicit discharge detection and elimination (C.5)	• Copper controls (C.13)
• Construction site controls (C.6)	• Bacteria controls (C.14)
• Public information and outreach (C.7)	• Discharges from unsheltered homeless populations (C.17)
• Water quality monitoring (C.8)	• Asset management plan (C.21)

Required Cost Categories
• Total cost
• Capital expenditures
• Land costs
• Personnel costs
• Consultant costs
• Overhead costs
• Construction costs
• Operation and maintenance costs
• Other costs

Bay Area Framework Development

- Bay Area MRP permittees worked together in a BAMSC* Regional Cost Reporting Work Group to develop the approach/framework
- The Bay Area Cost Reporting Framework and Guidance Manual were submitted to the Regional Water Board in June 2023
- Water Board staff has been supportive; provided minor comments
- Framework and Guidance Manual were revised to address comments, resubmitted in March 2024, and approved June 2024
- Work Group is continuing to coordinate with State Water Board staff as State Policy is developed

* BAMSC = Bay Area Municipal Stormwater Collaborative

Bay Area Framework Approach

- Approach objectives:
  - Meet MRP requirements
  - Balance detail vs. level of effort (costs are estimates)
  - Provide information in a regionally consistent but flexible manner
  - Provide value to stormwater program managers
- Tools include Excel workbook ("Framework") and Guidance Manual describing methodology, assumptions, etc.
- Uses a "build-up" approach: estimate various categories of costs by program area, then sum up to estimate total costs

Grouping of Cost Categories

Required Cost Categories
• Total cost
• Capital expenditures
• Land costs
• Personnel costs
• Consultant costs
• Overhead costs
• Construction costs
• Operation and maintenance costs
• Other costs

Proposed Cost Category Groupings
• Personnel & Overhead Costs
• External Professional Services (Consultant and Contractor)/Other Costs

• Capital Expenditures
  • Planning, Design, Construction & Permitting
  • Land Acquisition Costs

• Operation and Maintenance (O&M) Costs
• Total Costs for Current Reporting Year

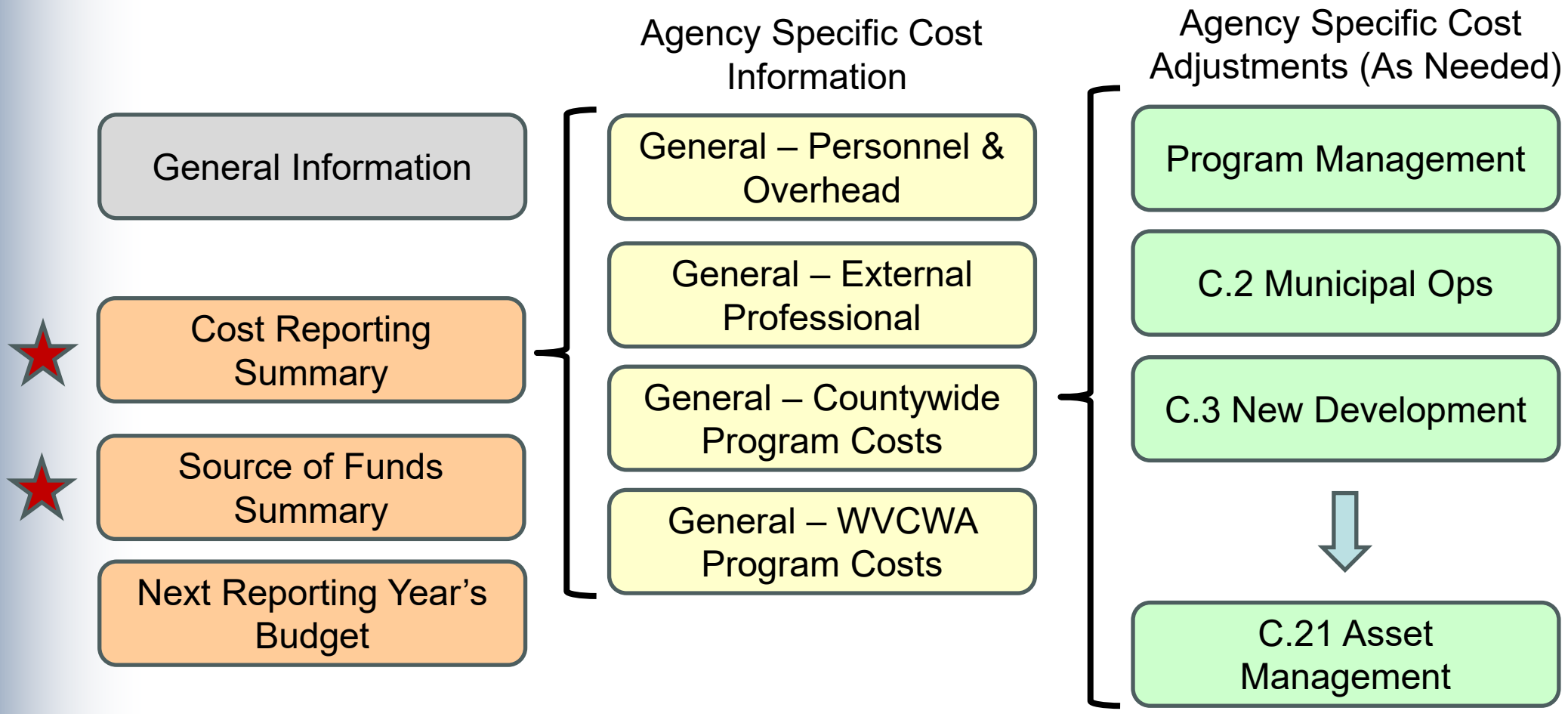
Cost Category	Definition	Assumptions	
Personnel	Cost of Permittee staff labor on stormwater permit-related activities	Labor rates or dollar amounts that include direct labor cost and cost of benefits	**Personnel and Overhead Costs**
Overhead	Cost of maintaining the infrastructure of the organization such as management, finance support services, janitorial, motor pool, etc.	Added to Personnel costs.	
Consultant	Consultant or contractor services used by the individual Permittee	Does not include countywide program consultant services.	**External Professional Services (Consultant and Contractor) and Other Costs**
Other	Costs not included in the other categories	Includes the Permittee's contribution to the countywide program budget (by provision/program area).	

Cost Category	Definition	Assumptions
Capital Expenditures	Expenditures related to the planning, design, and construction of stormwater quality related assets	Only applies to the following provisions: C.2, C.3, C.10, and C.12.
Construction	Cost of construction of stormwater quality related assets	Included in Capital Expenditures.
Land Acquisition	One time cost of real property, exclusive of the cost of any constructed assets on the property, necessary to be acquired for projects	Part of Capital Expenditures but reported separately. Applies to the purchase of land for construction of stormwater quality assets if land is not already owned by Permittee.
Operation and Maintenance (O&M)	Costs related to the O&M of publicly owned assets constructed for stormwater permit compliance	Includes personnel, contractor, equipment, materials, and disposal costs related solely to O&M.

Capital Expenditures

Operation and Maintenance

Framework – Tool Structure



★ Summary submitted as a part of the Annual Report

Personnel & Overhead Costs

Cost Reporting Framework

Personnel and Overhead Costs

To read this tab's Purpose and General Instructions (hover over)

Permittee Name	City of Campbell
Current Reporting FY	2024-2025

	Check Only One Box	
Option 1: Available FTE	**Instructions:** 1. Click on the checkbox. 2. Provide the estimated number of working hours per year (Cell J9). 3. Fill in columns E and F with the estimated average FTE and estimated fully loaded rate(s) per staff group(s) or individual positions. 4. Allocate the estimated fractions of FTE in the corresponding Provisions (training and direct costs need to be included into the fully	☐
Option 2: Dollar Amount	**Instructions:** 1. Click on the checkbox. 2. (Optional) Allocate the estimated dollar amounts for the line items "Training" and "Direct Cost Allocation". 3. Allocate the estimated dollar amounts per staff group(s) or individual positions in the corresponding Provisions.	☑

Purpose: This tab is used to introduce cost of Permittee staff labor on stormwater permit-related activities. The white cells with red text should be filled out; apportioning, automatically, the costs among the various permit provisions.

General Instructions:

1. Staff labor costs can be introduced using the following two options:
   - Option 1: Available FTE. This option use fully loaded rates (including overhead) for labor and Full Time Equivalent (FTEs) fractions to represent level of effort.
   - Option 2: Dollar Amount. This option use costs in dollar amounts (including overhead) for labor by directly allocated by provision.
2. Choose one of these options by clicking on the corresponding checkbox.
3. Follow the instructions indicated for the chosen Option.

Notes:

1. "O&M" means maintenance of the permittee's water quality hard assets related to C.2, C.3, C.10, and C.12 (O&M costs associated with both C.3 and C.12 compliance [i.e., GSI] must be reported under provision C.3).
2. O&M should not include the costs associated with implementing O&M verification inspection programs that are focused on ensuring the O&M of privately owned stormwater treatment systems.
3. For "O&M only" columns, report estimated fractions of FTE or dollar amounts associated only with internal staff performing O&M activities.

Additional information can be found in the Cost Reporting Guidance Manual, pages 6, 7, 8, 10 and 11.

Personnel & Overhead (FTE Option)

	Check Only One Box	
Option 1: Available FTE	**Instructions:** 1. Click on the checkbox. 2. Provide the estimated number of working hours per year (Cell J9). 3. Fill in columns E and F with the estimated average FTE and estimated fully loaded rate(s) per staff group(s) or individual positions. 4. Allocate the estimated fractions of FTE in the corresponding Provisions (training and direct costs need to be included into the fully loaded rate).	☑

Hourly rate

Fully Loaded Rate Multiplier: 2,080

Category	Notes [Optional]	Available FTE for Stormwater Program	Fully Loaded Rate (Average for Groups)	Program Mgmt.	C.2 (Don't include O&M-related costs)	C.2 (O&M Only)	C.3 (Don't include O&M-related costs)	C.3 (O&M Only)	C.4	C.5	C.6	C.7
Stormwater Program Coordinator	Jane Doe	1.00	$ 100.00	1.00								
Environmental Services Aide	Terry Tan	0.50	$ 40.00	0.20					0.10			0.20
Environmental Services Associate	John Smith	1.00	$ 70.00	0.20	0.10		0.10		0.20	0.20	0.10	0.10
Planning Department Associate	Corey Kalb	0.25	$ 70.00				0.25					
Corp Yard Maintenance Staff	6 staff	1.50	$ 50.00		1.00	0.50						
Construction Site Inspectors	5 staff	5.00	$ 60.00								5.00	
Parks Department Maintenance Staff	10 staff	1.00	$ 50.00					1.00				
Public Works Department Staff	5 staff	1.00	$ 80.00	0.20			0.80					

Personnel & Overhead (FTE Option)

	Check Only One Box	
Option 1: Available FTE	**Instructions:** 1. Click on the checkbox. 2. Provide the estimated number of working hours per year (Cell J9). 3. Fill in columns E and F with the estimated average FTE and estimated fully loaded rate(s) per staff group(s) or individual positions. 4. Allocate the estimated fractions of FTE in the corresponding Provisions (training and direct costs need to be included into the fully loaded rate).	☑

Annual rate

Fully Loaded Rate Multiplier: 1

Category	Notes [Optional]	Available FTE for Stormwater Program	Fully Loaded Rate (Average for Groups)	Program Mgmt.	C.2 (Don't include O&M-related costs)	C.2 (O&M Only)	C.3 (Don't include O&M-related costs)	C.3 (O&M Only)	C.4	C.5	C.6	C.7
Stormwater Program Coordinator	Jane Doe	1.00	$ 208,000.00	1.00								
Environmental Services Aide	Terry Tan	0.50	$ 83,200.00	0.20					0.10			0.20
Environmental Services Associate	John Smith	1.00	$ 145,600.00	0.20	0.10		0.10		0.20	0.20	0.10	0.10
Planning Department Associate	Corey Kalb	0.25	$ 145,600.00				0.25					
Corp Yard Maintenance Staff	6 staff	1.50	$ 104,000.00		1.00	0.50						
Construction Site Inspectors	5 staff	5.00	$ 124,800.00								5.00	
Parks Department Maintenance Staff	10 staff	1.00	$ 104,000.00					1.00				
Public Works Department Staff	5 staff	1.00	$ 166,400.00	0.20			0.80					

Personnel & Overhead Example (FTE Option)

			Fully Loaded Rate Multiplier:	2,080								
Category	**Notes [Optional]**	**Available FTE for Stormwater Program**	**Fully Loaded Rate (Average for Groups)**	**Program Mgmt.**	**C.2 (Don't include O&M-related costs)**	**C.2 (O&M Only)**	**C.3 (Don't include O&M-related costs)**	**C.3 (O&M Only)**	**C.4**	**C.5**	**C.6**	**C.7**
Stormwater Program Coordinator	Jane Doe	1.00	$ 100.00	1.00								
Environmental Services Aide	Terry Tan	0.50	$ 40.00	0.20					0.10			0.20
Environmental Services Associate	John Smith	1.00	$ 70.00	0.20	0.10		0.10		0.20	0.20	0.10	0.10
Planning Department Associate	Corey Kalb	0.25	$ 70.00				0.25					
Corp Yard Maintenance Staff	6 staff	1.50	$ 50.00		1.00	0.50						
Construction Site Inspectors	5 staff	5.00	$ 60.00								5.00	
Parks Department Maintenance Staff	10 staff	1.00	$ 50.00					1.00				
Public Works Department Staff	5 staff	1.00	$ 80.00	0.20			0.80					

Program Mgmt.	**C.2 (Don't include O&M-related costs)**	**C.2 (O&M Only)**	**C.3 (Don't include O&M-related costs)**	**C.3 (O&M Only)**	**C.4**	**C.5**	**C.6**	**C.7**
$ 208,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
$ 16,640	$ -	$ -	$ -	$ -	$ 8,320	$ -	$ -	$ 16,640
$ 29,120	$ 14,560	$ -	$ 14,560	$ -	$ 29,120	$ 29,120	$ 14,560	$ 14,560
$ -	$ -	$ -	$ 36,400	$ -	$ -	$ -	$ -	$ -
$ -	$ 104,000	$ 52,000	$ -	$ -	$ -	$ -	$ -	$ -
$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 624,000	$ -
$ -	$ -	$ -	$ -	$ 104,000	$ -	$ -	$ -	$ -
$ 33,280	$ -	$ -	$ 133,120	$ -	$ -	$ -	$ -	$ -

Personnel & Overhead (Dollar Amount Option)

Check Only One Box		
Option 2: Dollar Amount	**Instructions:** 1. Click on the checkbox. 2. (Optional) Allocate the estimated dollar amounts for the line items "Training" and "Direct Cost Allocation". 3. Allocate the estimated dollar amounts per staff group(s) or individual positions in the corresponding Provisions.	☑

Category	Notes [Optional]	Total Personnel & Overhead Costs per Provision										Total Personnel Cost
		Program Mgmt.	C.2 (Don't include O&M-related costs)	C.2 (O&M Only)	C.3 (Don't include O&M-related costs)	C.3 (O&M Only)	C.4	C.5	C.6	C.7	[...]	
Training												$ -
Direct Cost Allocation												$ -
Stormwater Program Coordinator	Jane Doe	$ 208,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		$ 208,000
Environmental Services Aide	Terry Tan	$ 16,640	$ -	$ -	$ -	$ -	$ 8,320	$ -	$ -	$ 16,640		$ 41,600
Environmental Services Associate	John Smith	$ 29,120	$ 14,560	$ -	$ 14,560	$ -	$ 29,120	$ 29,120	$ 14,560	$ 14,560		$ 145,600
Planning Department Associate	Corey Kalb	$ -	$ -	$ -	$ 36,400	$ -	$ -	$ -	$ -	$ -		$ 36,400
Corp Yard Maintenance Staff	6 staff	$ -	$ 104,000	$ 52,000	$ -	$ -	$ -	$ -	$ -	$ -		$ 156,000
Construction Site Inspectors	5 staff	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 624,000	$ -		$ 624,000
Parks Department Maintenance Staff	10 staff	$ -	$ -	$ -	$ -	$ 104,000	$ -	$ -	$ -	$ -		$ 104,000
Public Works Department Staff	5 staff	$ 33,280	$ -	$ -	$ 133,120	$ -	$ -	$ -	$ -	$ -		$ 166,400

External Professional Services

Consultant or Contract Services	Contract Type (Optional)	Total Contract Amount Invoiced this FY	Program Mgmt.	C.2 (Don't include O&M-related costs)	C.2 (O&M Only)	C.3 (Don't include O&M-related costs)	C.3 (O&M Only)	C.4	C.5	C.6	C.7	C.8
Consulting Firm ABC, Inc.	Program Mgmt Services	$ 100,000.00	0.25	0.05		0.20		0.10	0.10	0.10	0.20	
Consulting Firm DEF, Inc.	Monitoring Services	$ 70,000.00										1.00
West County Fire District	Stormwater Inspections	$ 50,000.00						1.00				
GHI Landscaping	GSI Maintenance	$ 25,000.00					1.00					

Program Mgmt.	C.2 (Don't include O&M-related costs)	C.2 (O&M Only)	C.3 (Don't include O&M-related costs)	C.3 (O&M Only)	C.4	C.5	C.6	C.7	C.8
$ 25,000	$ 5,000	$ -	$ 20,000	$ -	$ 10,000	$ 10,000	$ 10,000	$ 20,000	$ -
$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 70,000
$ -	$ -	$ -	$ -	$ -	$ 50,000	$ -	$ -	$ -	$ -
$ -	$ -	$ -	$ -	$ 25,000	$ -	$ -	$ -	$ -	$ -

Countywide Program Costs

Cost Reporting Framework

Countywide Program Costs

To read this tab's Purpose and General Instructions (hover over)

Back to Cost Reporting Summary

Total for Program FY	2024-2025	$2,993,420

Provision	Countywide Program Cost	Permittee Cost
Program Mgmt	$408,095	$ 56,888
C.2	$25,833	$ 3,601
C.3	$388,996	$ 54,226
C.4	$36,669	$ 5,112
C.5	$23,441	$ 3,268
C.6	$21,755	$ 3,033
C.7	$235,527	$ 32,832
C.8	$943,648	$ 131,545
C.9	$27,971	$ 3,899
C.10	$448,102	$ 62,465
C.11	$31,113	$ 4,337
C.12	$288,371	$ 40,199
C.13	$0	$ -
C.14	$0	$ -
C.15	$28,692	$ 4,000
C.16	$0	$ -
C.17	$37,437	$ 5,219
C.18	$0	$ -
C.19	$0	$ -
C.21	$47,770	$ 6,659
	Total	**$ 417,283**

Permittee	Share	Program
San Mateo	13.94%	SMCWPPP

Dropdown Menu with Permittee Names and % Share

Example Program Area Tab
C.7: Public Information and Outreach

Cost Reporting Framework

Provision C.7 - Public Information and Outreach

Back to Cost Reporting Summary

Provision C.7 - Summary (Linked to "Cost Reporting Summary")

Permit Provision	Category	Operation & Maintenance (O&M)			Personnel & Overhead Costs (Not O&M related)	External Professional Services / Other Costs (Not O&M related)	Capital Expenditures		Total Expenditures for Current Reporting Year
		Personnel & Overhead Costs	External Professional Services/ Other Costs	Miscellaneous			Planning, Design, Permitting, Equipment Acquisition, Construction	Land Acquisition Costs	
C.7	Public Information and Outreach				$ 41,600	$ 20,000			$ 61,600
---	Countywide Program Costs					$ 15,150			$ 15,150
---	Other Costs					$ 16,500			$ 16,500
	Total Expenditures by Category				**$ 41,600**	**$ 51,650**			
								Total Expenditures for Stormwater Program	**$ 93,250**
						See Detailed Costs			

Example Program Area Tab
C.3: New and Redevelopment Controls

Cost Reporting Framework

Provision C.3 - Development and Redevelopment

Back to Cost Reporting Summary

Provision C.3 - Summary (Linked to "Cost Reporting Summary")

Permit Provision	Category	Operation & Maintenance (O&M)			Personnel & Overhead Costs (Not O&M related)	External Professional Services / Other Costs (Not O&M related)	Capital Expenditures		Total Expenditures for Current Reporting Year
		Personnel & Overhead Costs	External Professional Services/ Other Costs	Miscellaneous			Planning, Design, Permitting, Equipment Acquisition, Construction	Land Acquisition Costs	
C.3	Development and Redevelopment	$ 116,480	$ 25,000	$ 114,500	$ 300,560	$ 20,000	$ 425,000	$ 800,000	$ 1,801,540
---	Countywide Program Costs					$ 8,619			$ 8,619
---	Other Costs					$ 16,500			$ 16,500
	Total Expenditures by Category			**$ 255,980.00**	**$ 300,560**	**$ 45,119**	**$ 425,000**	**$ 800,000**	
								Total Expenditures for Stormwater Program	**$ 1,826,659**
						See Detailed Costs			

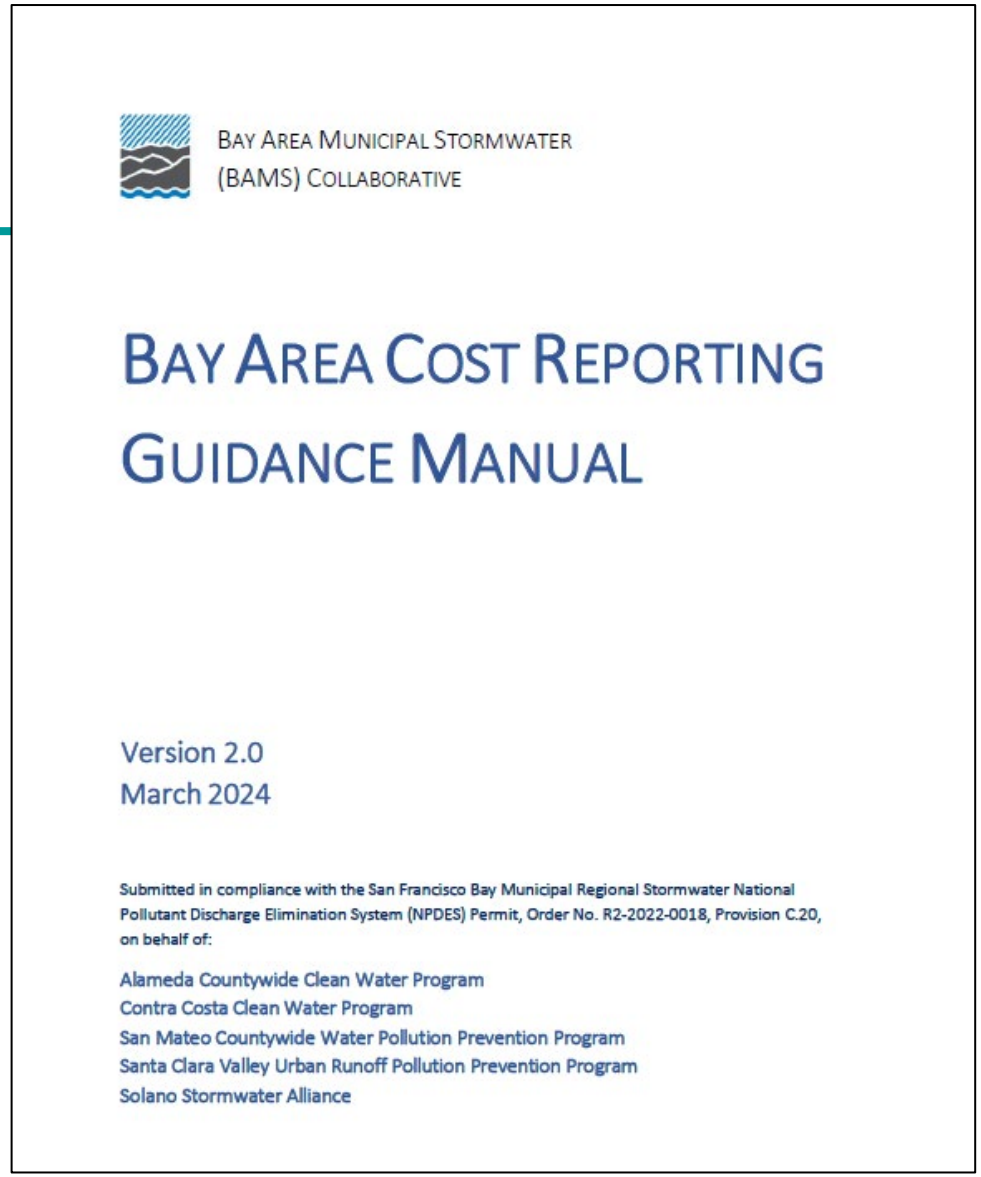
Example Cost Reporting Summary Table

Permit Provision	Program Area	Estimated Cost by Category: Personnel[b] & Overhead Costs[c] (Not O&M related)	External Professional Services/Other Costs[d] (Not O&M related)	Capital Expenditures[e]: Planning, Design, Permitting & Construction[f]	Capital Expenditures[e]: Land Acquisition Costs[g]	Operation and Maintenance (O&M) Costs[h]	Estimated Total Expenditures for Current Reporting Year	Estimated Total Expenditures for Next Reporting Year
---	Program Management[a]	$ 2,983,000	$ 85,000				$ 3,068,000	$ 3,148,000
---	Stormwater Permit Fees		$ 10,000				$ 10,000	$ 10,000
C.2	Municipal Operations	$ 310,000	$ 25,000	$ 425,000	$ 800,000	$ 268,000	$ 1,828,000	$ 1,828,000
C.3	New Development and Redevelopment	$ 301,000	$ 45,000	$ 425,000	$ 800,000	$ 256,000	$ 1,827,000	$ 1,827,000
C.4	Industrial and Commercial Site Controls	$ 37,000	$ 77,000				$ 114,000	$ 114,000
C.5	Illicit Discharge Detection and Elimination	$ 29,000	$ 28,000				$ 57,000	$ 57,000
C.6	Construction Site Control	$ 639,000	$ 34,000				$ 673,000	$ 673,000
C.7	Public Information and Outreach	$ 73,000	$ 49,000				$ 122,000	$ 122,000
C.8	Water Quality Monitoring	$ 50,000	$ 112,000				$ 162,000	$ 162,000
C.9	Pesticides Toxicity Control	$ 58,000	$ 19,000				$ 77,000	$ 77,000
C.10	Trash Load Reduction and Assessment	$ 67,000	$ 26,000	$ 425,000	$ 800,000	$ 177,000	$ 1,495,000	$ 1,495,000
C.11	Mercury Controls	$ 75,000	$ 19,000				$ 94,000	$ 94,000
C.12	PCBs Control	$ 94,000	$ 28,000	$ 425,000	$ 800,000	$ 177,000	$ 1,524,000	$ 1,524,000
C.13	Copper Control	$ 109,000	$ 17,000				$ 126,000	$ 126,000
C.14	Bacteria Control	$ 150,000	$ 17,000				$ 167,000	$ 169,000
C.15	Exempted and Conditionally Exempted Discharges	$ 52,000	$ 17,000				$ 69,000	$ 69,000
C.16	Discharges to Areas of Special Biological Significance	$ 131,000	$ 17,000				$ 148,000	$ 148,000
C.17	Discharges Associated with Unsheltered Homeless	$ 200,000	$ 18,000				$ 218,000	$ 218,000
C.18	Control of Sediment Discharges from Coastal San Mateo County Roads	$ 125,000	$ -				$ 125,000	$ 125,000
C.19	Cities of Antioch, Brentwood, and Oakley, and Unincorporated Contra Costa County and Contra Costa County Flood Control and Water Conservation District	$ 100,000	$ 17,000				$ 117,000	$ 117,000
C.21	Asset Management	$ 116,000	$ 18,000				$ 134,000	$ 134,000
	Estimated Total Expenditures by Category	**$ 5,699,000**	**$ 678,000**	**$ 1,700,000**	**$ 3,200,000**	**$ 878,000**		
						Estimated Total Expenditures for Stormwater Program	**$ 12,155,000**	**$ 12,237,000**

Bay Area Cost Reporting Guidance Manual

1. Background
2. Approach
3. General Guidance and Assumptions
4. Organization and Use of Framework
5. Guidance by MRP Provision
6. Estimating Costs for the Upcoming Fiscal Year
7. Reporting Sources of Funds

App A – Cost Reporting Cover Sheet


BAY AREA MUNICIPAL STORMWATER (BAMS) COLLABORATIVE

BAY AREA COST REPORTING GUIDANCE MANUAL

Version 2.0
March 2024

Submitted in compliance with the San Francisco Bay Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit, Order No. R2-2022-0018, Provision C.20, on behalf of:

Alameda Countywide Clean Water Program
Contra Costa Clean Water Program
San Mateo Countywide Water Pollution Prevention Program
Santa Clara Valley Urban Runoff Pollution Prevention Program
Solano Stormwater Alliance

Key Guidance and Considerations

- Estimating capital costs
  - Capital costs include costs of planning, design, and construction of publicly owned stormwater quality related assets (e.g, green infrastructure (GI) and trash full capture systems), or the estimated proportion of project costs related to those facilities
  - Only report for capital costs for Provisions C.2 (municipal operations), C.3 (new and redevelopment/GI), C.10 (trash) and C.12 (PCBs)
  - All GI projects should be reported under Provision C.3, even if implemented for PCBs control or other requirements

Key Guidance and Considerations

- Estimating capital costs, continued
  - When a capital project is implemented over multiple fiscal years, report total cost of a capital project during the reporting fiscal year in which the project starts
  - Cost can be based on the budgeted amount for the project or the reported actual expenditures (if available)
  - If the capital project budget/expenditures includes personnel/overhead costs or external professional costs, do not also report those costs separately, to avoid double counting

Key Guidance and Considerations

- Estimating operation and maintenance (O&M) costs
  - Reported O&M costs will only be those associated with O&M of publicly owned stormwater quality related assets under C.2, C.3, C.10, and C.12
    - Typically comprised of personnel, consultant/contractor, equipment, supplies, and/or disposal costs
    - Personnel and consultant/contractor costs should be assigned specifically to O&M tasks related to assets in C.2, C.3, C.10, and C.12
    - O&M costs can also be reported as the sum of maintenance work orders for the reporting year that are associated with assets under C.2, C.3, C.10 and C.12
    - O&M costs should not include the costs associated with implementing O&M verification inspection programs that are focused on ensuring the O&M of privately owned stormwater treatment systems

Key Guidance and Considerations

- Estimating the “stormwater portion” of municipal operations and equipment costs
  - Costs reported should only include costs related to MRP required tasks
  - For municipal activities that are integrated and/or coordinated with stormwater compliance programs, only the portion of these costs related to stormwater compliance can be reported. Examples:
    - Street sweeping: Only “enhanced” street sweeping costs can be reported; OK to estimate the percentage of the overall street sweeping program cost
    - Large equipment purchases: Total cost or a portion of costs may be reported if related to stormwater compliance (e.g., a vactor truck used for O&M of trash controls)

Key Guidance and Considerations

- Guidance for specific MRP provisions
  - For each provision, the Guidance Manual provides information on typical activities, assumptions, examples of “other costs”, and how to address activities covering multiple provisions
  - Program management – includes general administration and management of stormwater program, development of the cost report (C.20) and annual report (C.22), and permit renewal activities (C.25)
  - Not all provisions apply to SMCWPPP Permittees – if a provision doesn’t apply, leave it blank

Estimating Costs for Next Reporting Year

- Cost report must include an estimate of costs for the upcoming fiscal year
- Framework tool provides a table for estimating the upcoming year's costs using one of two methods:
  - Use of an estimated multiplier on the program area costs for the current reporting year
  - Direct entry of expected costs for the upcoming year by program area (e.g., based on an adopted budget for that year)
- Estimated costs for the next reporting year are automatically added to the main Cost Reporting Summary Table

Reporting Sources of Funds

- Cost report must include a description of the source(s) of funds used to meet the necessary expenditures to implement the MRP
  - Examples include General Fund, property tax, stormwater utility, sales tax, gas tax, solid waste fees, user fees, grants, etc.
- Not required to provide the amount of funds from each source
- Framework tool contains a table for summarizing the sources of funds specific to the Permittee

Annual Cost Reporting Process

- Permittees will submit their cost reports for FY 24-25 on September 30, 2025, as part of their FY 24-25 Annual Reports
- What to include in Annual Report:
  - Cover sheet (see Appendix A of Guidance Manual for example)
  - Cost Reporting Summary Table (PDF)
  - Source of Funds Summary Table (PDF)
- Annual Reports are submitted in SMARTS (publicly available)
- **Water Board staff may request submittal of the entire spreadsheet if needed**

Appendix A – Template Cover Sheet

- [Permittee Name] has submitted the Cost Reporting Summary and Source of Funds Summary **in good faith, based on the best available stormwater program cost reporting data** compiled from multiple sources and departments within [Permittee Name]. As such, it is **important to recognize the inherent limitations** associated with the summaries including:
- The values provided are compiled from **multiple, internal sources and different cost accounting programs**, and attempt to separate out duties and time that staff spend complying with the numerous requirements in the MRP. As a result, the individual and compiled **values may differ from the adopted budgets**.
- Given the difficulty in accounting for the wide range of staff and expenditures associated with the implementation of the stormwater program throughout the [Permittee Name], **the values in the Cost Summary Table are rounded to the nearest $1,000**.
- Given the diversity of the Bay Area permittee agencies in size, characteristics, and jurisdiction, the **costs presented** for various program areas **may or may not be comparable among permittees**.

Questions?