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**VIA CSM DROPBOX**

Heather Hasley  
Executive Director  
Commission on State Mandates  
980 9th Street, Suite 300  
Sacramento, CA 95814

Re: County of San Diego, Cities of Carlsbad, Del Mar, Imperial Beach, Lemon Grove, Poway, San Marcos, Santee, Solana Beach, Chula Vista, Coronado, El Cajon, Encinitas, Escondido, La Mesa, National City, Oceanside, San Diego, and Vista Rebuttal to Draft Proposed Decision and Parameters and Guidelines, Test Claim 07-TC-09-R

Dear Ms. Hasley:

The County of San Diego and the Cities of Carlsbad, Del Mar, Imperial Beach, Lemon Grove, Poway, San Marcos, Santee, Solana Beach, Chula Vista, Coronado, El Cajon, Encinitas, Escondido, La Mesa, National City, Oceanside, San Diego, and Vista (collectively, “Municipal Claimants”)<sup>1</sup> respectfully submit this rebuttal to the responses submitted by the State Water Resources Control Board (“State Water Board”) and California Regional Water Quality Control Board, San Diego Region (“San Diego Water Board”) (collectively, “Water Boards”), the Department of Finance (“Finance”) and the State Controller’s Office (collectively, the “State”). The Municipal Claimants appreciate the opportunity to respond to the State Comments, and also appreciate the time and significant work that the Commission on State Mandates (“Commission”) has invested over the past many years on Test Claim 07-TC-09-R (“Test Claim”).<sup>2</sup>

The Municipal Claimants submitted comments on the Draft Proposed Decision and Parameters and Guidelines (“Municipal Comments”) and, as part of those comments, requested that the Commission adopt reasonable reimbursement methodologies (“RRMs”) for the mandated programs or activities. In response, the Water Boards, State Controller’s Office, and Finance each

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<sup>1</sup> The term “Co-Permittee” refers to County of San Diego, Cities of Carlsbad, Del Mar, Imperial Beach, Lemon Grove, Poway, San Marcos, Santee, Solana Beach, Chula Vista, Coronado, El Cajon, Encinitas, Escondido, La Mesa, National City, Oceanside, San Diego, Vista, San Diego County Regional Airport Authority, and the San Diego Unified Port District.

<sup>2</sup> The Test Claim is a challenge to the requirements of Order No. R9-2007-0001, issued by the San Diego Regional Water Quality Control Board (“2007 Permit”).

drafted comments on the Draft Proposed Decisions Parameters and Guidelines for Test Claim 07-TC-09-R (“State Responses”), including questions and comments on the proposed RRM.

The Municipal Claimants submit this rebuttal to address the issues raised in the State Responses. First, the Municipal Claimants clarify how the RRM process would work. Second, the rebuttal explains that the Municipal Claimants have a right to propose, and properly proposed, the RRM for these mandated activities or programs, which are all well-suited for RRM. Last, the Municipal Claimants address the State Responses relating to the timing of the mandated activities, and provide proposed revisions to the RRM to address these issues.

## I. HOW AN RRM WORKS

The Municipal Claimants can propose a methodology or reimbursement that would streamline the timing and process to get reimbursed.<sup>3</sup> At this stage, the Municipal Claimants are asking for approval of the formulas that would then be used by each Co-Permittee<sup>4</sup> to request reimbursement for the mandated activities or programs. Thus, if the Commission approves the RRM, the Co-Permittees will then submit information to complete the specific formula and request the appropriate reimbursement. Only after this additional information based on the approved formulas is submitted will the disbursement of the subvention occur.

For example, the formula for Conveyance System Cleaning is:

$$\begin{aligned}
 \textit{Reimbursement} &= \\
 &= \sum_{t=\textit{FY07/08}}^{\textit{FY14/15}} [(\textit{Unit Cost})_S(\#S)]_t + \sum_{t=\textit{FY07/08}}^{\textit{FY14/15}} [(\textit{Unit Cost})_P(P)]_t \\
 &+ \sum_{t=\textit{FY07/08}}^{\textit{FY14/15}} [(\textit{Unit Cost})_C(C)]_t
 \end{aligned}$$

As stated in the Municipal Comments, the term “ $(\textit{Unit Cost})_S$ ” refers to the cost to clean one inlet or storm basin adjusted annually by the CPI; the term “ $(\textit{Unit Cost})_P$ ” refers to the cost to clean one linear foot of the pipe adjusted annually by the CPI; “ $(\textit{Unit Cost})_C$ ” refers to the cost to clean one linear foot of the channel adjusted annually by the CPI; the term “ $\#S$ ” refers to the number of inlets or storm basins cleaned in a year by a Co-Permittee; the term “ $P$ ” refers to the distance of the pipe cleaned in linear feet by a Co-Permittee; and the term “ $C$ ” refers to the distance of the channel cleaned in linear feet by a Co-Permittee.<sup>5</sup>

<sup>3</sup> Gov’t Code § 17518.5(a).

<sup>4</sup> The Municipal Claimants understand that the Port of San Diego and San Diego Airport are contending they are able to recover, since they are Co-Permittees and are subject to the mandated activities. The Municipal Claimants therefore use Co-Permittee here to refer all parties subject to the 2007 Permit and the mandated activities.

<sup>5</sup> Declaration of John Quenzer in Support of the Rebuttal to State Comments on the Reasonable Reimbursement Mythology 07-TC-09-R (“Quenzer Decl.”) ¶ 13.c.

In this example, the Municipal Claimants are requesting the Commission to adopt to general formula on Conveyance System Cleaning, the various Unit Costs articulated in this formula, and the time for which the formula will apply. To get its specific reimbursement, each Co-Permittee will need to submit proof of the number of inlets or storm basins cleaned in a year , the distance of the pipe cleaned in linear feet , and the distance of the channel cleaned in linear feet.

In the Municipal Comments, the Municipal Claimants provided an overall expected reimbursement for each RRM for all of the Co-Permittees. This total number included the individual Co-Permittee inputs for the formulas; these inputs are included in Claimants' Comments on the Draft Proposed Decision and Parameters and Guidelines Volumes filed on February 20, 2024 Volumes<sup>6</sup> 2-13 attached to the Permittee Proposed RRM. These documents are Jurisdictional Urban Runoff Management Program ("JURMP") Annual Reports, Water Quality Improvement Project ("WQIP") Annual Reports, Watershed Urban Runoff Management Program ("WURMP") Annual Reports which were submitted by the Co-Permittees to the Regional Board during the duration of the 2007 Permit. All other documents were provided by D-Max or the County and properly authenticated. However, these were just estimated amounts. As noted above, each individual Co-Permittee will need to submit the inputs to the formulas and seek its individual subvention for the mandated activities. Appendix A to John Quenzer's Declaration has tables that explain what information the Co-Permittees will need to enter to get the reimbursement allocation.

To reiterate, the Municipal Claimants are asking the Commission to adopt each RRM formula, the Unit Costs associated with each formula, and the time for which the formula will apply. The revised formulas and unit costs are located on pages 16-20.

## **II. THE MUNICIPAL CLAIMANT PROPOSED RRM IS PROPER**

As stated in the original Municipal Comments, the RRM is proper under Government Code section 17518.5. These RRMs are based on detailed information from the Co-Permittees relating to the costs they incurred to perform the state mandated activities. Specifically, the RRMs were based off of the County 2011 Co-Permittee Surveys, Co-Permittee Declarations, JURMP Annual Reports, WQIP Annual Reports, WURMP Annual Reports, County Fiscal Analysis Documents, MOUs, County Watershed Workgroup Expenditure Records, Regional Cost Sharing Documentation, and D-Max proposal records relating to Jurisdictional Runoff Management Programs ("JRMP") annual reporting services ("D-Max Files").<sup>7</sup>

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<sup>6</sup> Citations to the Claimants' Comments on the Draft Proposed Decision and Parameters and Guidelines Volumes filed on February 20, 2024 will be referred as "Volume".

<sup>7</sup> Declaration of Lara Barrett in Support of Reasonable Reimbursement Mythology 07-TC-09-R ¶ 9, Declaration of John Quenzer in Support of Reasonable Reimbursement Mythology 07-TC-09-R ¶¶ 7-8, Municipal Claimants Supporting Documents Volumes 1-14; Quenzer Decl. ¶¶ 7-8; Declaration of Lara Barrett in Support of the Rebuttal to State Comments on the Reasonable Reimbursement Mythology 07-TC-09-R ("Barrett Declaration") ¶ 9.

As described in further detail below, the RRM was based on a representative sample of the eligible claimants as required by Government Code section 17518.5(b).<sup>8</sup> Nothing in the State Responses refutes that fact. Instead, the State Responses assert that there is insufficient information to recreate the RRM or determine which Co-Permittees were considered in the representative sample.<sup>9</sup> However, the State Responses cite to no legal authority requiring the RRM to explicitly indicate which entities were considered in the representative sample.<sup>10</sup> The information to recreate the RRM was provided in the Volumes concurrently submitted with the Municipal Comments.<sup>11</sup> For each item for which reimbursement is proper, the Municipal Claimants used all available applicable information to create the RRM.

Given that the RRM is a formula where each Co-Permittee would need to submit specific information to get the reimbursement, the RRMs inherently consider variation in costs among the local agencies.<sup>12</sup> The State Responses do not properly characterize how an RRM works. The general use and applicability of an RRM properly considers variation between the Co-Permittees as the allocation of each Co-Permittee would adequately incorporate the variation in costs between the Permittees. Nothing in the State Responses refutes this inherent variation created by the use of an RRM.<sup>13</sup>

Furthermore, the Municipal Comments included the “documentation or assumption[s] relied upon to develop the proposed methodology.”<sup>14</sup> As stated previously, for each item for which reimbursement is proper, the Municipal Claimants used all available applicable information to create the RRM. All of the documentation was properly authenticated and much of it was already provided in this matter. The rationale for these RRMs and the documentation needed to support them was adequately explained in the Declaration of John Quenzer in Support of Reasonable Reimbursement Mythology 07-TC-09-R. With that established, the Municipal Claimants provided additional explanation for the cost formula format used for each individual RRM in the concurrently filed Quenzer Declaration.

Lastly, the RRM is an efficient and fair way to permit the Municipal Claimants to finally receive the money that the California Constitution, this Commission and two Courts of Appeal have found they are entitled to receive. The activities required by the 2007 Permit that are challenged in the Test Claim occurred starting in 2007. The State Responses indicate that the only reasonable way to handle the reimbursement is through receipts. The Municipal Claimants wish to remind the Commission that due to the State’s decision to contest all possible legal issues through years of unnecessary litigation, fourteen years have passed since the 2007 Permit and its unfunded mandates were adopted. Requiring Municipal Claimants to come up with receipts

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<sup>8</sup> Gov’t Code § 17518.5(b).

<sup>9</sup> Regional Water Board Response, Section I.A.

<sup>10</sup> *Id.*

<sup>11</sup> The Municipal Claimants inadvertently missed the County 2011 County Survey 2 in the original submission. This has been attached and authenticated in the Barrett Declaration.

<sup>12</sup> Gov’t Code § 17518.5(c).

<sup>13</sup> Regional Water Board Response, Section I.B.

<sup>14</sup> Cal. Code Regs., tit. 2, § 1183.12.

fourteen years after the work began is unreasonable in light of the RRM and improperly incentivizes the state to continue challenging unfunded mandates. The total cost of the 2007 Permit's mandated activities does not change the fact that these activities were required and that the Municipal Claimants were not properly reimbursed for these activities. Using the RRM process would be a fair way to finally provide the Municipal Claimants with reimbursement for funds that the State required them to expend years ago.

### **III. ALTHOUGH THE PERMITTEES SATISFIED THE REQUIREMENTS TO CREATE AN RRM, MUNICIPAL CLAIMANTS ARE PROVIDING ADDITIONAL DETAIL AND REVISIONS TO THE RRMS TO ADDRESS THE STATE RESPONSES**

The documentation needed to create the RRMs was previously submitted to the Commission.<sup>15</sup> The Municipal Claimants provided references to the relevant document types for the Commission to understand the basis and evidence supporting the RRM. These documents were submitted in the Volumes attached to the Municipal Comments.

The State Responses primarily complain that the RRM is based on too many documents and that they cannot recreate the RRM. Despite this, the State Responses did not provide a reference to any statute or regulation that required the State Board or the Commission to be able to exactly recreate the RRM. As stated previously, the documentation to create the RRM was included in the original submission. Many of the documents submitted were documents already submitted to the Regional Water Board and included in the record to the various aspects of litigation for this matter. Little, if any, of this information was new. However, to address the State Responses, the Municipal Claimants have provided more specific references to the previously submitted documents.<sup>16</sup>

Additionally, in response to the State Responses, the Municipal Claimants have made a few minor proposed revisions to the RRMs. The Municipal Claimants revised all of the reimbursement periods to be more clearly articulated in fiscal years.<sup>17</sup> Most of these revisions relate to the time when reimbursement was proper and the format of the time for which the summation is applied.<sup>18</sup> Although the 2007 Permit was finalized in 2007, the Municipal Claimants acknowledge that some tasks were not required immediately. Given that many of 2007 Permit activities were required beyond the date the Regional Board issued Order No. R9-2013-0001, as

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<sup>15</sup> See footnote 12, above, relating to the County 2011 County Survey 2.

<sup>16</sup> The Permittees note that the State Responses' complaints about the number of documents and inability to acknowledge and understand those documents fail to note that most of Volumes 2-13 including the JURMP Annual Reports, Water Quality Improvement Project Annual Reports, and WURMP Annual Reports were all documents submitted to the Regional Board as required by the 2007 Permit. The Regional Board should have known what information was provided in these documents considering they had all been previously submitted.

<sup>17</sup> Municipal Claimants note that the original RRMs were in fiscal years as well. Declaration of John Quenzer in Support of Reasonable Reimbursement Mythology 07-TC-09-R ¶ 11 ("the year refers to the fiscal year where the mandate applied (i.e., 2007 shall refer to fiscal year ("FY") 2006/2007).")

<sup>18</sup> Quenzer Decl. ¶ 11.e.

amended (“2013 Permit”), the Municipal Claimants did not adjust the RRM to include only the time frame for which the 2007 Permit was in place.

The Municipal Claimants believe that cut-off years should be interpreted in the following ways. FY 2006/2007 claimed costs should be reduced to 43.29% of the total cost for the year to reflect that 158 of the 365 days in FY 2006/2007 were on or after January 24, 2007, which is the effective date of the 2007 Permit.<sup>19</sup> FY 2007/2008 claimed costs should be 27.05% of the total cost for the year to reflect that 99 days of the 366 days in FY 2007/2008 were on or after March 24, 2008, which is the date that Co-Permittees were required to begin implementing JURMP developed per the 2007 Permit requirements.<sup>20</sup> FY 2012/2013 claimed costs should be 98.90% of the total cost for the year to reflect that 361 of the 365 days in FY 2012/2013 were on or before June 26, 2013, which is the day before the effective date of the 2013 Permit.<sup>21</sup> FY 2014/2015 claimed cost should be 98.90% of the total cost for the year which reflects that 361 of the 365 days in FY 2014/2015 were on or before June 26, 2015, which is the day before Co-Permittees were required to submit and begin implementing JRMPs that reflected requirements of the 2013 Permit.<sup>22</sup> The time frame of reimbursement has been adjusted for the relevant RRM as needed as explained in more detail in the Quenzer Declaration under each particular RRM.

Where the RRM unit costs are unchanged, the numeric unit costs will not be explained again. Additionally, no Volume citations will be provided for information that would be submitted by each Co-Permittee in the reimbursement submission.

**A. Revisions to RRM for Reporting on Street Sweeping and Conveyance System Cleaning (Part J.3.a.(3)(c) (iv)-(viii), (x)-(xv))**

The Municipal Claimants proposed the following reasonable approximation of the local costs mandated by the state as suggested by Government Code section 17518.5<sup>23</sup> for reporting on street sweeping and conveyance system cleaning. The RRM has been revised to modify the applicable timeframe for reimbursement.<sup>24</sup>

$$\begin{aligned}
 & \textit{Reimbursement} \\
 &= \sum_{t=\textit{FY07/08}}^{\textit{FY12/13}} [\textit{Conveyance Reporting Cost}]_t \\
 &+ \sum_{t=\textit{FY07/08}}^{\textit{FY12/13}} [\textit{Sweeping Reporting Cost}]_t
 \end{aligned}$$

<sup>19</sup> See e.g. Quenzer Decl. ¶ 14.a.

<sup>20</sup> See e.g. Quenzer Decl. ¶ 12.a.

<sup>21</sup> See e.g. *Id.*

<sup>22</sup> See e.g. Quenzer Decl. ¶ 13.a.

<sup>23</sup> Quenzer Decl. ¶ 12.

<sup>24</sup> *Id.* at ¶ 12.a.

The term “*Conveyance Reporting Cost*” refers to the annual reporting cost per Co-Permittee to cover the conveyance system cleaning adjusted annually by the San Diego-Carlsbad Consumer Price Index for all urban consumers, not seasonally adjusted (“CPI”).<sup>25</sup> The Conveyance Reporting Cost standard unit cost represents the median of the permittee’s average annual conveyance system cleaning reported costs between FY 2007/2008 to FY 2009/2010 as reported by the Co-Permittees in submitted 2011 Co-Permittee Surveys focused on conveyance system cleaning located in Vol. 1, pp. 22-239 and the County 2011 County Survey 2 attached and authenticated in the Barrett Declaration.<sup>26</sup> The median was selected as a representative value for a standard unit cost for this unfunded mandate as it is a more conservative value than that obtained by utilizing the average of costs reported by the subset of Co-Permittees.<sup>27</sup>

The term “*Sweeping Reporting Cost*” refers to the annual cost per Co-Permittee to cover street sweeping reporting adjusted annually by the CPI.<sup>28</sup> The standard unit cost for Sweeping Reporting Cost represents the median of the permittee’s average annual reporting costs to cover street sweeping reporting between FY 2007/2008 to FY 2009/2010 as reported by the subset of Co-Permittees that prepared and submitted 2011 Co-Permittee Surveys focused on street sweeping located in Vol. 1, pp. 240-376.<sup>29</sup> The median was selected as a representative value for a standard unit cost for this unfunded mandate as it is a more conservative value than that obtained by utilizing the average of costs reported by the subset of Co-Permittee.<sup>30</sup>

**B. Revisions to RRM for Conveyance System Cleaning (Part D.3.a.(3)(b)(iii))**

The Municipal Claimants propose the following revised reasonable approximation of the local costs mandated by the state for conveyance system cleaning.<sup>31</sup> The conveyance system includes the inlet or storm basins, pipes, and channels. This RRM has been revised to modify the applicable timeframe.<sup>32</sup>

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<sup>25</sup> *Id.* at ¶ 12.c.

<sup>26</sup> *Id.* If the Commission decides not to consider the County Flood Control Co-Permittee Survey 2 attached and authenticated in the Barrett Declaration, the unit cost of the Conveyance Reporting Cost would be \$8,431.02 instead of the previously stated \$5,784.85. *Id.*

<sup>27</sup> *Id.*

<sup>28</sup> *Id.* at ¶ 12.d.

<sup>29</sup> *Id.*

<sup>30</sup> *Id.*

<sup>31</sup> Quenzer Decl. ¶ 13.

<sup>32</sup> *Id.* at ¶ 13.a.

*Reimbursement*

$$\begin{aligned}
 &= \sum_{t=\substack{FY07/08 \\ FY14/15}}^{FY14/15} [(Unit\ Cost)_S(\#S)]_t + \sum_{t=FY07/08}^{FY14/15} [(Unit\ Cost)_P(P)]_t \\
 &+ \sum_{t=FY07/08} [(Unit\ Cost)_C(C)]_t
 \end{aligned}$$

The term “(Unit Cost)<sub>S</sub>” refers to the cost to clean one inlet or storm basin adjusted annually by the CPI; the term “(Unit Cost)<sub>P</sub>” refers to the cost to clean one linear foot of the pipe adjusted annually by the CPI; “(Unit Cost)<sub>C</sub>” refers to the cost to clean one linear foot of the channel adjusted annually by the CPI ; the term “#S” refers to the number of inlets or storm basins cleaned in a year by a Co-Permittee; the term “P” refers to the distance of the pipe cleaned in linear feet by a Co-Permittee; and the term “C” refers to the distance of the channel cleaned in linear feet by a Co-Permittee.<sup>33</sup> #S, P, and C will all be supplied by the Co-Permittees while making a claim for reimbursement.

The (Unit Cost)<sub>S</sub>, (Unit Cost)<sub>P</sub>, and (Unit Cost)<sub>C</sub> are collectively referred to as the “Unit Costs” and were developed based on reported costs in the 2011 Co-Permittee Surveys located in Vol. 1, pp. 22-239, Co-Permittee Declarations located in Vol. 1, pp. 377-743, data included JRMP Annual Reports located in Vols. 2-11, and the County 2011 County Survey 2 attached and authenticated in the Barrett Declaration.<sup>34</sup> Each Unit Cost is the median cost to clean during FY 2007/2008.<sup>35</sup> The median was selected as a representative value for a standard unit cost for this unfunded mandate as it is a more conservative value than that obtained by utilizing the average of costs reported by the subset of Co-Permittees.<sup>36</sup>

The Municipal Claimants provided the 2005 State Survey to compare the unit costs supported by the 2005 State Survey and the those proposed under the RRM.<sup>37</sup> To reiterate, the 2005 State Survey values are not being directly used in the proposed reimbursement calculation approach.<sup>38</sup> The fact that the State Survey values for other Southern California municipalities from a few years before the period used to calculate Co-Permittees’ proposed standard unit costs are comparable to the unit costs calculated above based on data from Co-Permittees in the San Diego region supports that the unit costs are reasonable estimates.<sup>39</sup>

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<sup>33</sup> *Id.* at ¶ 13.c.

<sup>34</sup> *Id.* If the Commission decides not to consider the County Flood Control Co-Permittee Surveys attached and authenticated in the Barrett Declaration, the unit cost of the (Unit Cost)<sub>S</sub> would be \$124.46. *Id.*

<sup>35</sup> *Id.* at ¶ 13.d.-e.

<sup>36</sup> *Id.*

<sup>37</sup> *Id.* at ¶ 13.e.

<sup>38</sup> *Id.*

<sup>39</sup> *Id.*



**C. Revisions to RRM for the Educational Component (Parts D.5.a.(1), D.5.a.(2), D.5.b.(1)(a), D.5.b.(1)(b)(iii.-vi.), D.5.b.(1)(c), D.5.b.(1)(d), D.5.b.(2), D.5.b.(3))**

The Municipal Claimants propose the following revised RRM for the education component which includes regional outreach shared costs for the residential education program development and implementation and jurisdictional educational programs.<sup>40</sup> This RRM is a combination of a reasonable approximation of the local costs mandated by the state as suggested by Government Code section 17518.5 and the actual shared costs where no reasonable approximation was applicable.<sup>41</sup> This RRM has been revised to modify the applicable timeframe.<sup>42</sup>

*Reimbursement*

$$= \sum_{t=FY06/07}^{FY12/13} [(County\ Education\ Costs)(MOU)]_t$$

$$+ \sum_{t=FY07/08}^{FY14/15} [(Education\ Costs)(Total)]_t$$

The term “*County Education Costs*” refers to the actual annual shared costs for developing and implementing the Residential Education Program and “*MOU*” is the Co-Permittees’ proportional share of the cost per the applicable cost sharing agreement.<sup>43</sup> The yearly County Education Costs were reported in the Co-Permittee Declarations for FY2007/2008 to FY 2011/2012 located in Vol. 1, pp. 377-743.<sup>44</sup> For FY 2012/2013, the County Education Costs were determined by reviewing Regional Cost Sharing Documentation located in Vol. 13, pp. 10,917-13,074.<sup>45</sup> The data from both sources were summarized by year to calculate total annual regional education program development and implementation cost incurred by the Co-Permittees.<sup>46</sup>

The term “*Education Costs*” is the standard percentage of the total stormwater budget reported that is spent on jurisdiction education programs and “*Total*” is a Co-Permittee’s total stormwater expenditures in a particular year.<sup>47</sup> The value of Education Costs was determined by compiling a dataset of the total stormwater expenditures as reported by a subset of Co-Permittees as education costs. The expenditures listed in the JRMP annual reports located in Vols. 2-11, the jurisdictional education program expenditures as reported in JRMP annual reports located in Vols. 2-11, WURMP Annual Reports located in Vol. 13 pp. 1-10,756, and D-Max Proposal Documents located in Vol. 14, pp. 8-189 were used to calculate the percentage of each years

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<sup>40</sup> Quenzer Decl. ¶ 14.

<sup>41</sup> *Id.*

<sup>42</sup> *Id.* at ¶ 14.a.i. and ¶ 14.b.i.

<sup>43</sup> *Id.* at ¶ 14.a.iii.

<sup>44</sup> *Id.* at ¶ 14.a.iv.

<sup>45</sup> *Id.*

<sup>46</sup> *Id.*

<sup>47</sup> *Id.* at ¶ 14.b.iii.

reported total stormwater expenditures each Co-Permittee spent on jurisdictional educational costs.<sup>48</sup>

**D. Revisions to RRM for the Watershed Activities and Collaboration in the Watershed Urban Runoff Management Program (Part E.2.f & E.2.g)**

The Municipal Claimants propose the following revised RRM for the watershed activities and collaboration in the Watershed Urban Runoff Management Program. This includes the watershed workgroup cost share contributions, the jurisdictional watershed activities, the regional watershed activities such as the WURMP, and watershed workgroup activities.<sup>49</sup> This RRM is a combination of a reasonable approximation of the local costs mandated by the state as suggested by Government Code section 17518.5 and the actual costs where no reasonable approximation was applicable.<sup>50</sup> This RRM has been revised to modify the applicable timeframe.<sup>51</sup> Additionally, the RRM for the jurisdictional watershed activities was modified given feedback from the State Responses.<sup>52</sup>

*Reimbursement*

$$\begin{aligned}
 &= \sum_{t=FY06/07}^{FY12/13} [(Watershed Lead Costs)(MOUs)]_t \\
 &+ \sum_{t=FY07/08}^{2013} [4 * Watersheds * Jurisdictional Activities]_t \\
 &+ \sum_{t=2007}^{FY12/13} [(WURMP Costs)(MOU)]_t \\
 &+ \sum_{t=FY07/08} [(\text{Rate})(\# Attendees)(\# Meetings)]_t
 \end{aligned}$$

The term “*Watershed Lead Costs*” refers to the actual annual shared costs for the Watershed Workgroup and “*MOU*” is the Co-Permittees’ proportional share of the cost per the applicable cost sharing agreement.<sup>53</sup> The yearly Watershed Lead Costs that for the Watershed Workgroup lead Co-Permittee were determined by reviewing the County of San Diego costs included in the County Watershed Workgroup Expenditure Records located in Vol. 13, p. 10908

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<sup>48</sup> *Id.* at ¶ 14.b.iv.

<sup>49</sup> Quenzer Decl. ¶ 15.

<sup>50</sup> *Id.*

<sup>51</sup> *Id.* at ¶ 15.a.i., ¶ 15.b.i., ¶ 15.c.i. and ¶ 15.d.i.

<sup>52</sup> *Id.* at ¶ 15.b.iv.

<sup>53</sup> *Id.* at ¶ 15.a.iii.

and dividing the reported County costs by the percent of watershed costs that the County was responsible for in a given year to find the total watershed lead costs.<sup>54</sup>

The formula for jurisdictional watershed activities has changed to include the number of watersheds.<sup>55</sup> Now, the term “*Jurisdictional Activities*” refers to the cost to perform one jurisdictional activity per Co-Permittee adjusted annually for the CPI and “*Watersheds*” refers to the number of watersheds in which a Co-Permittee is located.<sup>56</sup> The original formula incorrectly did not account for the number of watersheds in which a Co-Permittee would be required to implement jurisdiction watershed activities, and thus would underestimate the costs for Co-Permittees that span multiple watersheds and overestimate the costs for Co-Permittees that are in one watershed.<sup>57</sup> Following consideration of the San Diego Water Board’s comments, the Permittees reevaluated the calculation of a standard unit cost per jurisdiction watershed activity.<sup>58</sup> The previous *Jurisdictional Activities* unit cost was \$8,125.00.<sup>59</sup> The reevaluated *Jurisdictional Activities* unit cost is \$2,500.<sup>60</sup> The value of the *Jurisdictional Activities* represents the median cost to perform one jurisdictional activity in FY07/08 based on implementation costs reported in Co-Permittee Declarations located in Vol. 1, pp. 377-743.<sup>61</sup> The median was selected because it was a more conservative estimate of a reasonable unit cost given the range of jurisdictional activities costs reported by the Claimants.<sup>62</sup> This revision is based on the followed changes to the analysis method in response to comments received and does not increase the expected reimbursement.<sup>63</sup> First, the revised calculation excludes the expected costs and considers only the actual costs Co-Permittees reported in their surveys.<sup>64</sup> Second, the revised calculation divides the total watershed activity cost by 4 times the number of WURMPs the agency is included in to incorporate the fact that Co-Permittees in multiple watersheds implemented different or duplicative activities in different watersheds.<sup>65</sup>

The term “*WURMP Costs*” refers to the actual annual costs for the Regional WURMP Working Group costs to develop and maintain the Regional Watershed Activities Database and “*MOU*” is the Co-Permittees’ proportional share of the cost per the applicable cost sharing agreement.<sup>66</sup> The Regional Cost Sharing Documentation located in Vol. 13, pp. 10,917-13,074 was used to create the WURMP Costs.<sup>67</sup>

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<sup>54</sup> *Id.*

<sup>55</sup> *Id.* at ¶ 15.b.iii.

<sup>56</sup> *Id.*

<sup>57</sup> *Id.*

<sup>58</sup> *Id.*

<sup>59</sup> *Id.*

<sup>60</sup> *Id.*

<sup>61</sup> *Id.*

<sup>62</sup> *Id.*

<sup>63</sup> *Id.*

<sup>64</sup> *Id.*

<sup>65</sup> *Id.*

<sup>66</sup> *Id.* at ¶ 15.c.iii.

<sup>67</sup> *Id.*

The term “*Rate*” refers to the cost of the Co-Permittee employee time per regional workgroup meeting; “# *Attendees*” is the number of representatives for each Co-Permittee that attended the watershed workgroup meeting; and “# *Meetings*” is the number of Watershed Workgroup meetings attended by a Co-Permittee.<sup>68</sup> The *Rate* represents the average cost for a Municipal Claimant employee to attend a meeting in FY07/08 and is based on the average of hourly rate data for Municipal Claimant employees who attend meetings reported in the Co-Permittee Declarations located in Vol. 1, pp. 377-743 and the typical duration (meeting plus travel time and preparation) of three hours reflected in the declarations.<sup>69</sup> The average and median are approximately the same, but the average was used because it is a slightly more conservative estimate than the median value.<sup>70</sup>

**E. RRM for the Regional Urban Runoff Management Program (Parts F.1., F.2. & F.3).**

The Municipal Claimants propose the following RRM for the Regional Urban Runoff Management Program (“RURMP”). This RRM is the actual costs of implementation as there was no reasonable applicable approximation.<sup>71</sup>

$$Reimbursement = \sum_{t=FY06/07}^{FY12/13} [(Cost\ Share)(MOU)]_t$$

The term “*Cost Share*” refers to the actual annual cost share values for the RURMP as invoiced by County and “*MOU*” is the Co-Permittees’ proportional share of the cost per the applicable cost sharing agreement.<sup>72</sup> RURMP costs are Regional Workgroup Expenditures specifically designated as allocated for RURMP annual reporting as reported by the following workgroups: Fiscal, Reporting, and Assessment (FRA); Industrial and Commercial Sources (ICS), Monitoring (MON), Municipal (MUNI), WURMP, Education and Regional Sources (ERS), and Land Development (LD).<sup>73</sup> The RURMP expenditures reported by these workgroups were removed from the workgroup expenditures presented for some of these workgroups in other categories (e.g., FRA expenses in item 17.b) to avoid double counting.<sup>74</sup> Expenditures data can be found in the County Watershed Workgroup Expenditure Records located in Vol. 13, pp. 10,908-10,916 and the Regional Cost Sharing documentation located in Vol. 13, pp. 19,017-13,074.<sup>75</sup>

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<sup>68</sup> *Id.* at ¶ 15.d.iii.

<sup>69</sup> *Id.* at ¶ 15.d.iv.

<sup>70</sup> *Id.*

<sup>71</sup> Quenzer Decl. ¶ 16.

<sup>72</sup> *Id.* at ¶ 16.c.

<sup>73</sup> *Id.*

<sup>74</sup> *Id.*

<sup>75</sup> *Id.*

**F. RRM for the Program Effectiveness Assessment (Parts I.1 & I.2).**

The Municipal Claimants propose the following RRM for the program effectiveness assessment which includes the jurisdictional program effectiveness assessments and the regional fiscal, reporting, and assessment workgroup activities.<sup>76</sup> This RRM is a combination of a reasonable approximation of the local costs mandated by the state as suggested by Government Code section 17518.5 and the actual costs where no reasonable approximation was applicable.<sup>77</sup> This RRM has been revised to modify the applicable timeframe.<sup>78</sup>

*Reimbursement*

$$= \sum_{t=FY07/08}^{FY12/13} [(Effectiveness)(Total)]_t$$

$$+ \sum_{t=FY06/07}^{FY12/13} [(FRA Workgroup Costs)(MOU)]_t$$

The term “*Effectiveness*” refers to the percentage of the total stormwater budget for all Co-Permittees spent on assessing if the jurisdiction program was effective and “*Total*” is a Co-Permittee’s total stormwater expenditures in a particular year.<sup>79</sup> The standard percentage of total stormwater budget spent by Co-Permittees on assessing jurisdictional program effectiveness was determined by evaluating the actual costs charged to several Co-Permittees for work completed by D-Max to fulfill the program effectiveness assessment requirements located in Vol. 14, pp. 8-189 and costs for program effectiveness assessment implementation reported by Co-Permittees in JRMP annual reports where available located in Vols. 2-11.<sup>80</sup>

The term “*FRA Workgroup Costs*” are the shared costs for developing and implementing the Regional Fiscal, Reporting, Assessment Workgroup Expenditures and “*MOU*” is the Co-Permittees’ proportional share of the cost per the applicable cost sharing agreement.<sup>81</sup> The County Watershed Workgroup Expenditure Records located in Vol. 13, pp. 10,908-10,916 were used to provide the *FRA Workgroup Costs*.<sup>82</sup> The yearly *FRA Workgroup Costs* do not include costs reported by the FRA Workgroup to be associated with RURMP review.<sup>83</sup>

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<sup>76</sup> Quenzer Decl. ¶ 17.

<sup>77</sup> *Id.*

<sup>78</sup> *Id.* at ¶ 17.a.i. and ¶ 17.b.i.

<sup>79</sup> *Id.* at ¶ 17.a.iii.

<sup>80</sup> *Id.* at ¶ 17.a.iv.

<sup>81</sup> *Id.* at ¶ 17.b.iii.

<sup>82</sup> *Id.*

<sup>83</sup> *Id.*

**G. RRM for the Long-Term Effectiveness Assessment (Part I.5).**

The Municipal Claimants propose the following RRM for the long-term effectiveness assessment. This RRM is the actual costs of implementation as there was no reasonable applicable approximation.<sup>84</sup>

$$Reimbursement = \sum_{t=FY06/007}^{FY12/13} [(Contractor Costs)(MOU)]_t$$

The term “*Contractor Costs*” are the actual annual costs of the contractors needed to assess the long-term effectiveness of the projects as reported by County and “*MOU*” is the Co-Permittees’ proportional share of the cost per the applicable cost sharing agreement.<sup>85</sup> The Regional Cost Sharing Documentation located in Vol. 13, pp. 10,917-13,074 was used to determine the *Contractor Costs*.<sup>86</sup>

**H. RRM for the All-Permittee Collaboration (Part L.1.a.(3)-(6)).**

The Municipal Claimants propose the following RRM for the all-permittee collaboration. As explained above, the RRM has been revised to modify the applicable timeframe. All Co-Permittee collaboration includes support for regional workgroup meetings, regional workgroup meetings, and workgroup expenditures. This RRM is the actual costs of implementation as there was no reasonable applicable approximation.<sup>87</sup> This RRM has been revised to modify the applicable timeframe.<sup>88</sup>

$$\begin{aligned}
 Reimbursement &= \sum_{t=FY06/07}^{FY12/13} [(County Cost)(MOU)]_t \\
 &+ \sum_{t=FY06/07}^{FY12/13} [(Rate)(\# Meeting Attendances)]_t \\
 &+ \sum_{t=FY06/07} [(Workgroup Cost)(MOU)]_t
 \end{aligned}$$

The term “*County Cost*” refers to the actual costs spent to support the various all Co-Permittee meetings and “*MOU*” is the Co-Permittees’ proportional share of the cost per the

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<sup>84</sup> Quenzer Decl. ¶ 18.

<sup>85</sup> *Id.* at ¶ 18.c.

<sup>86</sup> *Id.*

<sup>87</sup> Quenzer Decl. ¶ 19.

<sup>88</sup> *Id.* at ¶ 19.a.i., ¶ 19.b.i., and ¶ 19.c.i.

applicable cost sharing agreement.<sup>89</sup> The *County Costs* in this formula are Regional Workgroup Expenditures specifically designated as meeting support; these expenses do not overlap and are not included in other reimbursement formulae (e.g., FRA Workgroup expenses in Section 17.b).<sup>90</sup> These expenditures were reported by the following workgroups: ERS, FRA, ICS, LD, MON, MUNI, PPS, WURMP.<sup>91</sup> Expenditures data can be found in the County Watershed Workgroup Expenditure Records located in Vol. 13, pp. 10,908-10,916 and the Regional Cost Sharing documentation located in Vol. 13, pp. 19,017-13,074.<sup>92</sup>

The term “*Rate*” refers to the cost of the Municipal Claimant employee time per regional workgroup meeting and “*# Meeting Attendances*” is the number of times a representative of a Co-Permittee attended a regional workgroup meeting.<sup>93</sup> The way the Rate was determined is identical to the Rate in the watershed workgroup activities RRM.<sup>94</sup>

The term “*Workgroup Cost*” refers to the actual costs of activities performed by the workgroup and “*MOU*” is the Co-Permittees’ proportional share of the cost per the applicable cost sharing agreement.<sup>95</sup> The Regional Workgroup Expenditure Records located in Vol. 13, pp. 10,917-13,074 were used to determine the *Workgroup Cost*.<sup>96</sup>

#### **I. The Municipal Claimants Request the Commission to Adopt the RRMs**

The Municipal Claimants respectfully request that the Commission adopt the RRMs described above and in the D-Max Declaration. For convenience, all formulas have been gathered and listed in the below tables for adoption.

The Municipal Claimants also respectfully request the Commission to allow the Municipal Claimants to recover any owed interest from the reimbursements, as well as recoverable legal and expert costs to process the Test Claim.

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<sup>89</sup> *Id.* at ¶ 19.a.iii.

<sup>90</sup> *Id.*

<sup>91</sup> *Id.*

<sup>92</sup> *Id.*

<sup>93</sup> *Id.* at ¶ 19.b.iii.

<sup>94</sup> *Id.* at ¶ 19.b.iv.

<sup>95</sup> *Id.* at ¶ 19.c.iii.

<sup>96</sup> *Id.*

Item to be Reimbursed	Proposed Reasonable Reimbursement Method
Reporting on Street Sweeping and Conveyance System Cleaning (Part J.3.a.(3)(c) (iv)-(viii), (x)-(xv))	$Reieimbursement = \sum_{t=FY07/08}^{FY12/13} [Conveyance Reporting Cost]_t + \sum_{t=FY07/08}^{FY12/13} [Sweeping Reporting Cost]_t$
Conveyance System Cleaning (Part D.3.a.(3)(b)(iii))	$Reimbursement = \sum_{t=FY07/08}^{FY14/15} [(Unit Cost)_S(\#S)]_t + \sum_{t=FY07/08}^{FY14/15} [(Unit Cost)_P(P)]_t + \sum_{t=FY07/08}^{FY14/15} [(Unit Cost)_C(C)]_t$
Educational Component (Parts D.5.a.(1)-(2), D.5.b.(1)(a), D.5.b.(1)(b)(iii.-vi.), D.5.b.(1)(c), D.5.b.(1)(d), D.5.b.(2), D.5.b.(3))	$Reimbursement = \sum_{t=FY06/07}^{FY12/13} [(County Education Costs)(MOU)]_t + \sum_{t=FY07/08}^{FY14/15} [(Education Costs)(Total)]_t$
Watershed activities and collaboration in the Watershed Urban Runoff Management Program (Part E.2.f & E.2.g)	$Reimbursement = \sum_{t=FY06/07}^{FY12/13} [(Watershed Lead Costs)(MOUs)]_t + \sum_{t=FY07/08}^{FY12/13} [4 * Watersheds * Jurisdictional Activities]_t$ $+ \sum_{t=FY07/08}^{FY12/13} [(WURMP Costs)(MOU)]_t + \sum_{t=FY06/07}^{FY12/13} [(Rate)(\# Attendees)(\# Meetings)]_t$
Regional Urban Runoff Management Program (Parts F.1., F.2. & F.3)	$Reimbursement = \sum_{t=FY06/07}^{FY12/13} [(Cost Share)(MOU)]_t$
Program Effectiveness Assessment (Parts I.1 & I.2)	$Reimbursement = \sum_{t=FY07/08}^{FY12/13} [(Effectivness)(Total)]_t + \sum_{t=FY06/07}^{FY12/13} [(FRA Workgroup Costs)(MOU)]_t$
Long-term Effectiveness Assessment (Part I.5)	$Reimbursement = \sum_{t=FY07/08}^{FY12/13} [(Contractor Costs)(MOU)]_t$
All Permittee Collaboration (Part L.1.a.(3)-(6))	$Reimbursement = \sum_{t=FY06/07}^{FY12/13} [(County Cost)(MOU)]_t + \sum_{t=FY06/07}^{FY12/13} [(Rate)(\# Meeting Attendances)]_t$ $+ \sum_{t=FY06/07}^{FY12/13} [(Workgroup Cost)(MOU)]_t$



Item to be Reimbursed	Proposed Reasonable Reimbursement Method With Unit Costs <sup>97</sup>
Reporting on Street Sweeping and Conveyance System Cleaning (Part J.3.a.(3)(c) (iv)-(viii), (x)-(xv))	$Reieimbursement = \sum_{t=FY07/08}^{FY12/13} [\$5,784.85^*]_t + \sum_{t=FY07/08}^{FY12/13} [\$6,143.67^*]_t$
Conveyance System Cleaning (Part D.3.a.(3)(b)(iii))	$Reimbursement = \sum_{t=FY07/08}^{FY14/15} [\$150.66^*(\#S)]_t + \sum_{t=FY07/08}^{FY14/15} [\$6.77^*(P)]_t + \sum_{t=FY07/08}^{FY14/15} [\$8.52^*(C)]_t$
Educational Component (Parts D.5.a.(1)-(2), D.5.b.(1)(a), D.5.b.(1)(b)(iii.-vi.), D.5.b.(1)(c), D.5.b.(1)(d), D.5.b.(2), D.5.b.(3))	$Reimbursement = \sum_{t=FY06/07}^{FY12/13} [(County\ Education\ Costs)(MOU)]_t + \sum_{t=FY07/08}^{FY14/15} [0.0216(Total)]_t$
Watershed activities and collaboration in the Watershed Urban Runoff Management Program (Part E.2.f & E.2.g)	$Reimbursement = \sum_{t=FY06/007}^{FY12/13} [(Watershed\ Lead\ Costs)(MOUs)]_t + \sum_{t=FY07/08}^{FY12/13} [4 * Watersheds * \$2,500^*]_t$ $+ \sum_{t=FY07/08}^{FY12/013} [(WURMP\ Costs)(MOU)]_t + \sum_{t=FY06/07}^{FY12/13} [(\$262.88^*)(\# Attendees)(\# Meetings)]_t$
Regional Urban Runoff Management Program (Parts F.1., F.2. & F.3)	$Reimbursement = \sum_{t=FY06/07}^{FY12/13} [(Cost\ Share)(MOU)]_t$
Program Effectiveness Assessment (Parts I.1 & I.2)	$Reimbursement = \sum_{t=FY07/08}^{FY12/13} [0.0372(Total)]_t + \sum_{t=FY06/07}^{FY12/13} [(FRA\ Workgroup\ Costs)(MOU)]_t$
Long-term Effectiveness Assessment (Part I.5)	$Reimbursement = \sum_{t=FY07/08}^{FY12/13} [(Contractor\ Costs)(MOU)]_t$
All Permittee Collaboration (Part L.1.a.(3)-(6))	$Reimbursement = \sum_{t=FY07}^{FY12/13} [(County\ Cost)(MOU)]_t + \sum_{t=FY06/07}^{FY12/13} [(\$262.88^*)(\# Meeting\ Attendances)]_t$ $+ \sum_{t=FY06/07}^{FY12/13} [(Workgroup\ Cost)(MOU)]_t$

<sup>97</sup> Numbers with an asterisk are those unit costs that adjust with time due to CPI adjustments.

Actual Costs included in the RRM:

<b>Fiscal Year</b>	<b>County Education Costs</b>
FY 2006/2007	-
FY 2007/2008	\$219,226.90
FY 2008/2009	\$438,452.75
FY 2009/2010	\$876,907.50
FY 2010/2011	\$920,752.90
FY 2011/2012	\$966,791.36
FY 2012/2013	\$138,040.00

<b>Watershed</b>	<b>Fiscal Year</b>	<b>Watershed Lead Costs</b>
Carlsbad	FY06-07	\$32,010.99
	FY07-08	\$24,438.85
	FY08-09	\$24,727.44
	FY09-10	\$25,964.27
	FY10-11	\$28,625.74
	FY11-12	\$30,054.97
	FY12-13	\$23,053.00
Los Peñasquitos	FY06-07 <sup>2</sup>	-
	FY07-08	\$2,400.37
	FY08-09	\$24,291.01
	FY09-10	\$23,739.33
	FY10-11	\$26,294.38
	FY11-12	\$25,469.18
	FY12-13	\$24,504.30
San Diego Bay	FY06-07 <sup>2</sup>	-
	FY07-08 <sup>2</sup>	-
	FY08-09 <sup>2</sup>	-
	FY09-10 <sup>2</sup>	-
	FY10-11 <sup>2</sup>	-
	FY11-12	\$14,927.71
	FY10-11	\$14,608.03
	FY12-13	\$14,927.71
San Diego River	FY06-07	-
	FY07-08	\$19,909.78
	FY08-09	\$29,633.49

	FY09-10	\$29,633.49
	FY10-11	\$29,633.49
	FY11-12	\$32,075.07
	FY12-13	\$15,035.09
San Dieguito	FY06-07 <sup>2</sup>	-
	FY07-08	\$1,723.40
	FY08-09	\$11,318.16
	FY09-10	\$17,799.59
	FY09-10	\$3,546.64
	FY10-11	\$23,668.87
	FY11-12	\$18,125.64
	FY12-13	\$24,176.21

Fiscal Year	WURMP Costs
FY 2008/2009	\$2,737.91
FY 2009/2010	\$3,287.23

Fiscal Year	Cost Share
FY 2008/2009	\$2,928.91
FY 2009/2010	\$5,230.98
FY 2010/2011	\$1,926.50

Fiscal Year	FRA Workgroup Costs
FY 2008/2009	\$24,466.92
FY 2009/2010	\$32,423.11
FY 2010/2011	\$72,983.57

Fiscal Year	Contractor Costs
FY 2010/2011 (FRA Workgroup)	\$132,212.21
FY 2010/2011 (Monitoring Workgroup)	\$212,327.00

Fiscal Year	County Costs
FY 2008/2009	\$57,285.40

FY 2009/2010	\$69,576.92
FY 2010/2011	\$44,665.30
FY 2011/2012	\$56,311.45

Fiscal Year	Workgroup Costs
FY 2008/2009	\$270.97
FY 2009/2010	\$147.13

#### IV. CONCLUSION

For the foregoing reasons, the Municipal Claimants respectfully request removal of the references to SB 231 and adoption of the RRM and Unit Costs proposed for all reimbursable state mandated activities. If the Commission does not adopt the suggested RRM, the Municipal Claimants respectfully request that the Commission revise the Proposed Decision to include all activities that are reasonably necessary to implement the state mandated activities as described in the Municipal Comments.

Pursuant to Title 2, section 1183.8 and section 1183.3 of the California Code of Regulations, I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my personal knowledge, information, or belief, and that this declaration is executed on this 16th day of December 2024, at San Diego, California.

Sincerely,



Shawn D. Hagerty  
of BEST BEST & KRIEGER LLP

cc: Anya Kwan  
93939.30001\42983226.8

**DECLARATION OF LARA BARRETT  
IN SUPPORT OF THE REBUTTAL TO STATE COMMENTS ON  
THE REASONABLE REIMBURSEMENT METHODOLOGY  
FOR 07-TC-09-R**

I, Lara Barrett, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth below and, if called as a witness, I could testify competently to all of the facts set forth herein.
2. Except as otherwise stated, the facts set forth herein are known to me personally or have been determined by my review of public records or official records maintained by the County of San Diego (“County”) in the ordinary course of business. All records reviewed were maintained by authorized personnel of the County, or persons acting under their control, in the ordinary course of business at or near the time of the act, condition, or event described therein. If called to testify as a witness, I could and would testify competently thereto.
3. I have worked for the County for six years. I currently work in the County’s Watershed Protection Program as a Land Use/Environmental Planner III.
4. I received education and training for my various positions with the County. Generally, all of my training taught me to perform my job consistent with applicable federal, state and local laws. I successfully completed all of my required education and training.
5. As a Land Use/Environmental Planner III, my responsibilities include: grant tracking and reporting, various compliance efforts, and support on legal cases. I have been in this role for approximately three years. Previously I worked in the Land Use and Environment Group Executive Office as a Chief Administrative Office Staff Officer for three years. My responsibilities in that role included preparation of documents and presentations for County Board of Supervisor (“Board”) meetings and assisting departments in implementing Board direction.
6. In my role with the County, I have become familiar with Order No. R9-2007-0001, issued by the San Diego Regional Water Quality Control Board (“2007 Permit”) as well as Order No. R9-2013-0001, as amended (“2013 Permit”).
7. On December 11, 2023, I was asked to gather records to support the creation of reasonable reimbursement methodologies to support reimbursement for the stormwater mandates from the 2007 Permit. The records I found, reviewed, and provided to D-Max Engineering included the County 2011 Co-Permittee Surveys. The County 2011 Co-Permittee Surveys included those surveys completed by the County.
8. The 2011 County Co-Permittee Surveys include three surveys created by County personnel to memorialize the costs actually incurred at the time the costs were incurred. The first survey covers meeting attendance, time spent at meetings, and the costs relating to attendance including employee salaries. The second survey covers the actual and reporting costs of the structure cleaning. The third survey covers the actual and reporting costs of the street sweeping.

9. The second survey for the County (“County 2011 County Permittee Survey 2”) was completed in two portions by two different County groups (respectively, County Roads and County Flood Control). All other County 2011 Co-Permittee Surveys were included in the Municipal Claimants Supporting Documents Volume 1, pages 1-376. However, neither portion of County 2011 County Permittee Survey 2 was not included in the submission. Therefore, true and correct copies of the County Flood Control portion of County 2011 County Permittee Survey 2 is attached to this declaration as Exhibit A and the County Roads portion of the County 2011 County Permittee Survey 2 is attached to this declaration as Exhibit B.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

12/12/2024, County Operations Center  
Date and Place

**Lara Barrett** Digitally signed by Lara Barrett  
Date: 2024.12.12 13:13:39 -08'00'

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Lara Barrett

## General Explanation and Instructions for the Completion of “Conveyance System Inspection and Cleaning - Reasonable Reimbursement Methodology Unit Cost Survey”

### *Tab A. Instructions and Notes*

1. **Please return the completed survey by January 19, 2011.** Once completed, the file should be returned via email to Jon Van Rhyn (Jon.vanrhyn@sdcountry.ca.gov) with a cc to Leonard Kaye (Lkaye14765@aol.com) no later than 5:00 p.m., Wednesday January 19, 2011. If you have questions or need assistance please contact Jon by email or at 858-495-5133.
2. **Please name the completed file as follows:** The file provided to you contains the word JURISDICTION in its name. Please substitute your individual jurisdiction name for JURISDICTION; there is no need to make any additional changes.
3. **Fill in only the blue highlighted cells.** All other cells have been protected to prevent any inadvertent loss of data. Each of the blue cells should be completed regardless of whether or not it applies. For any that do not, fill in either a “zero” or “N/A” as applicable.
4. **Costs Not Included.** This RRM survey does not include the following costs: (1) reimbursable costs for parking signage and enforcement, which will be claimed as actual costs, (2) vehicle and equipment costs, which will be claimed as actual costs, and (3) costs of materials disposal, which are not reimbursable because they were required under the 2001 permit.  
inspection or maintenance of open channels, which will be claimed as actual costs. Results for any facilities considered to be within the category of
6. **Inclusion of "First" Inspections and Cleanings.** Although actual claims may not include the "first" annual inspection and cleaning of each catch basin and inlet (these were required in the 2001 permit), your survey results should count these activities. The purpose of the survey is to quantify the typical cost of these activities on a unit basis. It is therefore simpler to include all inspections and cleanings in the survey, and ensures a larger sample size.
7. **Claiming of Costs Applicable to the Mandate.** In some instances (i.e., fuel, or equipment maintenance), Copermittee costs may apply to activities other than those subject to the mandate. In such cases, only the proportion of the cost that applies to the mandate should be claimed.

### *Tab B. Cost Summary Sheet*

8. Based on the information you input in Worksheet C (in-house inspection costs), Worksheet D (In-house cleaning costs), and Worksheet E (Contractor Costs), the Tab B. 2.A. (Cost Summary) spreadsheet will auto-calculate.
9. The only information that needs to be input in Worksheet B is the contact information in Part 1 (General Information).

### *Tab C. In-house Inspection Costs*

10. **Note 1 (Conveyance System Inspection and Related Costs).** Please report only the portion of costs allocated to conveyance system inspection or related functions. If these costs are intermingled with cleaning-related costs, please estimate the proportion allocated to inspection functions, and describe the assumptions used to derive this estimate under "Source of Information" (see Note 6)  
inspection functions.
12. **Note 3 (Annual Salary).** Please report the salary earned by an employee during 2007-08.

13. **Note 4 (Benefit Rate)**. Please indicate the percentage of salary provided by your employer as an employee benefit rate during 2007-08.
14. **Note 5 (Indirect Cost Rate)**. Please use the annual indirect cost or overhead rate as a percentage of salary for FY 2007-08. If none is available use 10%, the State's default rate.
15. **Note 6 (Source of Information)**. Please indicate the documents and assumptions used for reported costs. Also document any assumptions used to derive the reported values.
16. **Note 7 (Source of Inspection Results)**. Please indicate the documents and assumptions used for reported costs.
17. **Note 8 (Reporting)**. Generally includes (1) Reporting and tracking policies and procedures, (2) data tracking and analysis, (3) report writing, and (4) associated supervision and management. For additional explanation, see Section IV.D. of the Copermittees' revised Parameters and Guidelines (11/15/10).
18. **Note 9 (Supervision and Management)**. Time spent by supervisory and management personnel supervising personnel directly responsible for performing the mandated activities.
19. **Note 10 (Employee and Vendor Training)**. The claimant's costs to develop, update, and conduct training on street sweeping policies, procedures, to develop and produce documentation (manuals, forms, etc.), and the training costs of all claimant and vendor employees who perform tasks necessary to implement conveyance system inspection and cleaning and related functions during the life of the Permit.
20. **Note 11 (Equipment Maintenance)**. Annual equipment maintenance costs, including parts, supplies (e.g., water), and personnel costs. This also includes the cost of operating, renting, leasing, or contracting for facilities to store and maintain equipment and supplies.
21. **Note 12 (Contract Management Costs)**. The costs of preparing requests for proposals or requests for bids, negotiating or drafting third party contracts, and subsequently administering service contracts for the time they are performing these tasks. For Worksheets C and D, contract management costs should only include those necessary to carry out the Copermittees' in-house conveyance system inspection and cleaning activities (e.g., contracted equipment use, waste disposal, etc.). Contract costs associated with contractor inspection and cleaning activities are included in Worksheet E (See Note 19).
22. **Note 14 (Vehicle and Equipment Maintenance)**. Annual maintenance costs, including parts, supplies (e.g., water), and personnel costs. This also includes the cost of operating, renting, leasing, or contracting for facilities to store and maintain vehicles, equipment, and supplies.
23. **Note 15 (Fuel)**. The actual cost of fuel necessary to run the conveyance system inspection and cleaning equipment and equipment used to transport collected materials.

#### ***Tab D. In-house Cleaning Costs***

24. **Note 16 (Conveyance System Cleaning Operations and Related Costs)**. Please report only the portion of costs allocated to conveyance system cleaning or related functions. If these costs are intermingled with inspection-related costs, please estimate the proportion allocated to cleaning functions, and describe the assumptions used to derive this estimate under "Source of Information" (see Note 6)
25. **Note 2 (Staff Person)**. Indicate, by names if possible, and by job classifications, the numbers of your staff persons who perform the indicated inspection functions.
26. **Note 3 (Annual Salary)**. Please report the salary earned by an employee during 2007-08.
27. **Note 4 (Benefit Rate)**. Please indicate the percentage of salary provided by your employer as an employee benefit rate during 2007-08.



28. **Note 5 (Indirect Cost Rate)**. Please use the annual indirect cost or overhead rate as a percentage of salary for FY 2007-08. If none is available use 10%, the State's default rate.
29. **Note 6 (Source of Information)**. Please indicate the documents and assumptions used for reported costs. Also document any assumptions used to derive the reported values.
30. **Note 7 (Source of Cleaning Results)**. Please indicate the documents and assumptions used to derive the reported values.

**Tab E. Contractor Costs**

31. **Note 17 (Contractor Costs)**. Please allocate a portion of the cost associated with conveyance system inspections and a portion with conveyance system cleaning functions. If these costs are intermingled, please estimate the proportion allocated to each, and describe the assumptions used to derive these estimates under "Source of Contract Cost Information" (see Note 6). Also please note that contract costs do not allow for itemization of specific costs (e.g., fuel, equipment maintenance, etc.). For the purposes of this survey, it is assumed that such costs are included within the broader categories of "Conveyance System Inspection" and "Conveyance System Cleaning." If such itemization is part of your contract activities, please indicate
32. **Note 18 (Supplemental In-house Costs)**. This section includes in-house personnel and non-personnel costs incurred in supporting contractors' mandated services. Note: It is not intended to replace Worksheets C and D, which correspond to all activities related to in-house inspections and cleaning. Worksheet E should describe only those supplemental activities related to contract inspection and cleaning.
33. **Note 10 (Contract Management Costs)**. Costs of managing conveyance system inspection and cleaning contracts.
34. **Note 6 (Source of Information)**. Please indicate the documents and assumptions used for reported costs. Also document any assumptions used to derive the reported values.

**Worksheet B: Unit Cost Summary Sheet**

<b>Part 1: General Information</b>					
Jurisdiction :	City or County		Alternate:	Susan Jones	
Contact Person :	John Smith		Phone:	619-123-1237	
Phone :	619-123-1234		E-Mail:	Susan.Jones@city.gov	
E-Mail :	John.smith@city.gov				

	FY 2007-08		FY 2008-09		FY 2009-10	
	Inspections	Cleanings	Inspections	Cleanings	Inspections	Cleanings
<b>Part 2: Cost Information</b>						
<b>A. In-house Costs (complete Worksheets C and D)</b>						
<u>Personnel Costs</u>						
Conveyance System Inspection	\$99,893		\$91,506		\$59,736	
Conveyance System Cleaning Operations		\$278,664		\$440,176		\$307,904
Reporting	\$0	\$0	\$0	\$0	\$0	\$0
Employee Supervision and Management	\$16,703	\$0	\$28,331	\$0	\$16,241	\$0
Employee and Vendor Training	\$0	\$0	\$0	\$0	\$0	\$0
Equipment Maintenance	\$0	\$0	\$0	\$0	\$0	\$0
Contract Management	\$0	\$0	\$0	\$0	\$0	\$0
<u>Non-personnel Costs</u>						
Equipment Maintenance	\$0	\$0	\$0	\$0	\$0	\$0
Fuel	\$0	\$0	\$0	\$0	\$0	\$0
Training Materials and Supplies	\$0	\$0	\$0	\$0	\$0	\$0
<b>Total In-house Costs</b>	<b>\$116,596</b>	<b>\$278,664</b>	<b>\$119,837</b>	<b>\$440,176</b>	<b>\$75,977</b>	<b>\$307,904</b>
<b>B. Contractor Costs (complete Worksheet E)</b>						
Conveyance System Inspection Contract	\$0		\$2		\$2	
Conveyance System Cleaning Operations Contract		\$0		\$0		\$0
Reporting	\$0	\$0	\$2	\$0	\$2	\$0
Contract Management	\$0	\$0	\$0	\$3	\$0	\$0
Employee and Vendor Training	\$0	\$1	\$0	\$0	\$0	\$0
Vehicle and Equipment Maintenance	\$0	\$2	\$2	\$2	\$2	\$2
<u>Non-personnel Costs</u>						
Vehicle and Equipment Maintenance	\$0	\$0	\$0	\$0	\$0	\$0
Fuel	\$0	\$0	\$1	\$0	\$0	\$1
Training Equipment and Supplies	\$1	\$1	\$0	\$1	\$1	\$0
<b>Total Contract Costs</b>	<b>\$1</b>	<b>\$4</b>	<b>\$7</b>	<b>\$6</b>	<b>\$7</b>	<b>\$3</b>
<b>Total Costs (In-house + Contractor)</b>	<b>\$116,597</b>	<b>\$278,668</b>	<b>\$119,844</b>	<b>\$440,182</b>	<b>\$75,984</b>	<b>\$307,907</b>

<b>Part 3: Inspection and Cleaning Totals (Note 3)</b>						
<b>Inspection Results</b>						
<b>a. In-house Results</b>						
Number of Inspections	2298		2391		2198	
Unit Cost per Inspection	\$50.73		\$50.11		\$34.56	
<b>b. Contract Results</b>						
Number of Inspections	450		450		450	
Unit Cost per Inspection	\$0.00		\$0.02		\$0.02	
<b>c. Combined Results</b>						
Number of Inspections	2748		2841		2648	
Unit Cost per Inspection	\$42.43		\$42.18		\$28.69	
<b>Cleaning Results</b>						
<b>a. In-house Results</b>						
Number of Cleanings		189		179		191
Unit Cost per Cleaning		\$1,474.41		\$2,459.08		\$1,612.06
<b>b. Contract Results</b>						
Number of Cleanings		0		0		\$0.00
Unit Cost per Cleaning		\$0.00		\$0.00		\$0.00
<b>c. Combined Results</b>						
Number of Cleanings		0		0		0
Unit Cost per Cleaning		\$0.00		\$0.00		\$0.00

**Worksheet C: In-house Conveyance System Inspection Costs and Results**

Annualized FY 2007-08 Salary Information							Personnel Cost Calculations						Source of Information (Note 6)
							FY 2007-08 Personnel Costs		FY 2008-09 Personnel Costs		FY 2009-10 Personnel Costs		
<u>Staff Person</u> (Note 2)	<u>Job Classification</u>	<u>Number</u> <u>in Class</u>	<u>Annual Salary</u> (Note 3)	<u>Benefit rate (%)</u> (Note 4)	<u>Indirect cost rate (%)</u> (Note 5)	<u>Salaries, Benefits, Indirect Totals</u>	<u>% of time dedicated to inspections</u>	<u>Annual cost for inspections</u>	<u>% of time dedicated to inspections</u>	<u>Annual cost for inspections</u>	<u>% of time dedicated to inspections</u>	<u>Annual cost for inspections</u>	
<b>Part 1: Conveyance System Inspection Costs (Note 1)</b>													
Use lines 1-20 if auto-calculating annual inspection costs for each year													
1	Enter Name	Equip. Operator (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
2	Multiple	Enter Job Classification	4	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
6	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
7	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
8	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
9	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
10	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
11	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
12	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
13	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
14	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
15	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
16	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
17	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
18	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
19	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
20	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
21	Use line 21 if inserting total inspection costs for each year							\$0		\$0		\$0	
<b>TOTALS</b>								\$0		\$0		\$0	
<b>Part 2: Other Personnel Costs Related to Conveyance System Inspections (Note 1)</b>													

**Source of Inspection Cost Information**  
Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.

Note: Only report statistics for catch basins and inlets. Do not include inspections of open channels.

**Worksheet C: In-house Conveyance System Inspection Costs and Results**

Annualized FY 2007-08 Salary Information							FY 2007-08 Personnel Costs		FY 2008-09 Personnel Costs		FY 2008-09 Personnel Costs		Source of Information (Note 6)	
<u>Staff Person (Note 1)</u>	<u>Job Classification</u>	<u>Number in Class</u>	<u>Annual Salary (Note 2)</u>	<u>Benefit rate (%) (Note 3)</u>	<u>Indirect cost rate (%) (Note 4)</u>	<u>Salaries, Benefits, Indirect Totals</u>	<u>% of time dedicated to function</u>	<u>Annual cost of function</u>	<u>% of time dedicated to function</u>	<u>Annual cost of function</u>	<u>% of time dedicated to function</u>	<u>Annual cost of function</u>		
<b>a. Reporting (Note 8)</b>														
Use lines 1-5 to auto-calculate annual reporting costs for each year														
1	Enter Name	Analyst (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	Source of Reporting Cost Information Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.
2	Multiple	Enter Job Classification	4	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
6	Use line 6 to insert total reporting costs for each year							\$0		\$0		\$0		
<b>Reporting Totals</b>							<b>\$0</b>		<b>\$0</b>		<b>\$0</b>		<b>\$0</b>	
<b>b. Supervision and Management (Note 9)</b>														
Use lines 1-5 if auto-calculating annual supervision and management costs for each year														
1	Enter Name	Program Mgr (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	Source of Supervision & Management Cost Information Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
6	Use line 6 if inserting total supervision and management costs for each year							\$0		\$0		\$0		
<b>Supervision and Management Totals</b>							<b>\$0</b>		<b>\$0</b>		<b>\$0</b>		<b>\$0</b>	
<b>c. Employee and Vendor Training (Note 10)</b>														
Use lines 1-5 if auto-calculating annual training costs for each year														
1	Enter Name	Supervisor (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	Source of Training Cost Information Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	

Note: Only report statistics for catch basins and inlets. Do not include inspections of open channels.

**Worksheet C: In-house Conveyance System Inspection Costs and Results**

6	Use line 6 if inserting total training costs for each year											\$0	\$0	\$0
<b>Training Totals</b>											<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	
<b>d. Vehicle and Equipment Maintenance (Note 11)</b>														
Use lines 1-5 if auto-calculating annual equipment maintenance costs for each year														
1	Enter Name	Equip. Operator (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
6	Use line 6 if inserting total equipment maintenance costs for each year											\$0	\$0	\$0
<b>Equipment Maintenance Totals</b>											<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	

**Source of Equipment Maintenance Cost Information**  
Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.

<b>e. Contract Management (Note 12)</b>														
Use lines 1-5 if auto-calculating annual contract management costs for each year														
1	Enter Name	Analyst II (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
6	Use line 6 if inserting total contract management costs for each year											\$0	\$0	\$0
<b>Contract Management Totals</b>											<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	

**Source of Contract Management Cost Information**  
Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.

<b>Part 3: Non-Personnel Costs Related to Conveyance System Inspections (Note 1)</b>														
1		Vehicle and Equipment Maintenance (Note 14)												
2		Fuel (Note 15)												
3		Training Materials and Supplies (Note 10)												
		<b>Total</b>												

**Source of Non-personnel Cost Information**  
Describe source of non-personnel cost information. Also use this space to document any assumptions used to determine non-personnel costs.

<b>Part 4: Total Costs (Personnel + Non-personnel)</b>														

Note: Only report statistics for catch basins and inlets. Do not include inspections of open channels.

**Worksheet C: In-house Conveyance System Inspection Costs and Results**

	\$0	\$0	\$0
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**Part 5: Inspection Results**

	FY 2007-08	FY 2008-09	FY 2009-10	Source of Inspection Results (Note 7)
Number of Inspections	2	2	2	Identify the source of inspection results. Also use this space to document any assumptions used to calculate inspection results.
Unit Cost per Inspection	\$ -	\$ -	\$ -	

Note: Only report statistics for catch basins and inlets. Do not include inspections of open channels.

**Worksheet D: In-house Conveyance System Cleaning Costs and Results**

Annualized FY 2007-08 Salary Information							Personnel Cost Calculations						Source of Information (Note 6)
							FY 2007-08 Personnel Costs		FY 2008-09 Personnel Costs		FY 2009-10 Personnel Costs		
Staff Person (Note 2)	Job Classification	Number in Class	Annual Salary (Note 3)	Benefit rate (%) (Note 4)	Indirect cost rate (%) (Note 5)	Salaries, Benefits, Indirect Totals	% of time dedicated to inspections	Annual cost for inspections	% of time dedicated to inspections	Annual cost for inspections	% of time dedicated to inspections	Annual cost for inspections	
1	Enter Name	Equip. Operator (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
2	Multiple	Enter Job Classification	4	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
6	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
7	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
8	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
9	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
10	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
11	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
12	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
13	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
14	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
15	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
16	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
17	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
18	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
19	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
20	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
21	Use line 21 if inserting total inspection costs for each year							\$0	\$0	\$0	\$0		
<b>TOTALS</b>							\$0	\$0	\$0	\$0			

**Source of Cleaning Cost Information**  
Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.

**Part 2: Other Personnel Costs Related to Conveyance System Cleaning (Note 16)**

Note: Only report statistics for catch basins and inlets. Do not include cleaning of open channels.

**Worksheet D: In-house Conveyance System Cleaning Costs and Results**

Annualized FY 2007-08 Salary Information							Personnel Cost Calculations						Source of Information (Note 6)	
							FY 2007-08 Personnel Costs		FY 2008-09 Personnel Costs		FY 2009-10 Personnel Costs			
Staff Person (Note 2)	Job Classification	Number in Class	Annual Salary (Note 3)	Benefit rate (%) (Note 4)	Indirect cost rate (Note 5)	Salaries, Benefits, Indirect Totals	% of time dedicated to inspections	Annual cost for inspections	% of time dedicated to inspections	Annual cost for inspections	% of time dedicated to inspections	Annual cost for inspections		
<b>a. Reporting (Note 8)</b>														
Use lines 1-5 to auto-calculate annual reporting costs for each year														
1	Enter Name	Analyst (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	Source of Reporting Cost Information Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.
2	Multiple	Enter Job Classification	4	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
6	Use line 6 to insert total reporting costs for each year							\$0		\$0		\$0		
<b>Reporting Totals</b>							<b>\$0</b>		<b>\$0</b>		<b>\$0</b>		<b>\$0</b>	
<b>b. Supervision and Management (Note 9)</b>														
Use lines 1-5 if auto-calculating annual supervision and management costs for each year														
1	Enter Name	Program Mgr (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	Source of Supervision & Management Cost Information Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
6	Use line 6 if inserting total supervision and management costs for each year							\$0		\$0		\$0		
<b>Supervision and Management Totals</b>							<b>\$0</b>		<b>\$0</b>		<b>\$0</b>		<b>\$0</b>	
<b>c. Employee and Vendor Training (Note 10)</b>														
Use lines 1-5 if auto-calculating annual training costs for each year														
1	Enter Name	Supervisor (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	Source of Training Cost Information Describe source of salary and personnel cost information. Also use this space to
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	

Note: Only report statistics for catch basins and inlets. Do not include cleaning of open channels.



**Worksheet D: In-house Conveyance System Cleaning Costs and Results**

Annualized FY 2007-08 Salary Information							Personnel Cost Calculations						Source of Information (Note 6)	
							FY 2007-08 Personnel Costs		FY 2008-09 Personnel Costs		FY 2009-10 Personnel Costs			
Staff Person (Note 2)	Job Classification	Number in Class	Annual Salary (Note 3)	Benefit rate (%) (Note 4)	Indirect cost rate (Note 5)	Salaries, Benefits, Indirect Totals	% of time dedicated to inspections	Annual cost for inspections	% of time dedicated to inspections	Annual cost for inspections	% of time dedicated to inspections	Annual cost for inspections	document any assumptions used to calculate costs.	
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0		\$0
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
6	Use line 6 if inserting total training costs for each year								\$0		\$0		\$0	
							<b>Training Totals</b>	<b>\$0</b>		<b>\$0</b>		<b>\$0</b>		
<b>d. Vehicle and Equipment Maintenance (Note 11)</b>														
Use lines 1-5 if auto-calculating annual equipment maintenance costs for each year														
1	Enter Name	Equip. Operator (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	Source of Equipment Maintenance Cost Information Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
6	Use line 6 if inserting total equipment maintenance costs for each year								\$0		\$0		\$0	
							<b>Equipment Maintenance Totals</b>	<b>\$0</b>		<b>\$0</b>		<b>\$0</b>		
<b>e. Contract Management (Note 12)</b>														
Use lines 1-5 if auto-calculating annual contract management costs for each year														
1	Enter Name	Analyst II (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	Source of Contract Management Cost Information Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
6	Use line 6 if inserting total contract management costs for each year								\$0		\$0		\$0	
							<b>Equipment Maintenance Totals</b>	<b>\$0</b>		<b>\$0</b>		<b>\$0</b>		

Note: Only report statistics for catch basins and inlets. Do not include cleaning of open channels.

**Worksheet D: In-house Conveyance System Cleaning Costs and Results**

Annualized FY 2007-08 Salary Information							Personnel Cost Calculations						Source of Information (Note 6)
							FY 2007-08 Personnel Costs		FY 2008-09 Personnel Costs		FY 2009-10 Personnel Costs		
<u>Staff Person</u> (Note 2)	<u>Job Classification</u>	<u>Number in Class</u>	<u>Annual Salary</u> (Note 3)	<u>Benefit rate (%)</u> (Note 4)	<u>Indirect cost rate (%)</u> (Note 5)	<u>Salaries, Benefits, Indirect Totals</u>	<u>% of time dedicated to inspections</u>	<u>Annual cost for inspections</u>	<u>% of time dedicated to inspections</u>	<u>Annual cost for inspections</u>	<u>% of time dedicated to inspections</u>	<u>Annual cost for inspections</u>	
<b>Contract Management Totals</b>													
							<b>FY 2007-08</b>	<b>FY 2008-09</b>	<b>FY 2009-10</b>	<b>Source of Non-personnel Cost Information</b> Describe source of non-personnel cost information. Also use this space to document any assumptions used to determine non-personnel costs.			
1			Vehicle and Equipment Maintenance (Note 14)				\$0	\$0	\$0				
2			Fuel (Note 15)				\$0	\$0	\$0				
3			Training Materials and Supplies (Note 10)				\$0	\$0	\$0				
			<b>Total</b>				\$0	\$0	\$0				
<b>Part 4: Total Costs (Personnel + Non-personnel)</b>							<b>FY 2007-08</b>	<b>FY 2008-09</b>	<b>FY 2009-10</b>				
							\$0	\$0	\$0				
<b>Part 5: Cleaning Results</b>							<b>FY 2007-08</b>	<b>FY 2008-09</b>	<b>FY 2009-10</b>	<b>Source of Cleaning Results (Note 17)</b> Identify the source of inspection results. Also use this space to document any assumptions used to calculate cleaning results.			
Number of Cleanings							1	1	1				
Unit Cost per Cleaning							\$ -	\$ -	\$ -				

Note: Only report statistics for catch basins and inlets. Do not include cleaning of open channels.

**Worksheet E: Contractor Costs and Results**

		FY 2007-08		FY 2008-09		FY 2009-10	
		Inspections	Cleanings	Inspections	Cleanings	Inspections	Cleanings
<b>Part 1: Contract Costs</b>							
<u>Contractor Costs (Note 17)</u>							
1	Conveyance System Inspection (Note 1)	\$0		\$2		\$2	
2	Conveyance System Cleaning (Note 16)		\$0		\$0		\$0
<u>Supplemental In-house Costs (Note 18)</u>							
<i>Personnel Costs</i>							
1	Reporting (Note 8)	\$0	\$0	\$2	\$0	\$2	\$0
2	Contract Management (Note 19)	\$0	\$0	\$0	\$3	\$0	\$0
3	Employee and Vendor Training (Note 10)	\$0	\$1	\$0	\$0	\$0	\$0
4	Vehicle and Equipment Maintenance (Note 14)	\$0	\$2	\$2	\$2	\$2	\$2
<i>Non-personnel Costs</i>							
1	Vehicle and Equipment Maintenance (Note 14)	\$0	\$0	\$0	\$0	\$0	\$0
2	Fuel (Note 15)	\$0	\$0	\$1	\$0	\$0	\$1
3	Training Materials and Supplies (Note 10)	\$1	\$1	\$0	\$1	\$1	\$0
<b>Total Contract Costs</b>		<b>\$1</b>	<b>\$4</b>	<b>\$7</b>	<b>\$6</b>	<b>\$7</b>	<b>\$3</b>

**Source of Contract Cost Information (Note 6)**  
 Describe source of contract cost information. Also use this space to document any assumptions used to calculate costs.

		FY 2007-08		FY 2008-09		FY 2009-10	
		Inspections	Cleanings	Inspections	Cleanings	Inspections	Cleanings
<b>Part 2: Inspection and Cleaning Results</b>							
<b>Inspections</b>							
	Number of Inspections	450		450		450	
	Unit Cost per Inspection	\$ 0.00		\$ 0.02		\$ 0.02	
<b>Cleanings</b>							
	Number of Cleanings		250		225		200
	Unit Cost per Cleaning		\$ 0.02		\$ 0.03		\$ 0.02

**Source of Inspection and Cleaning Results (Note 7)**  
 Describe source of inspection and cleaning results. Also use this space to document any assumptions used to calculate inspection and cleaning results.

## General Explanation and Instructions for the Completion of “Conveyance System Inspection and Cleaning - Reasonable Reimbursement Methodology Unit Cost Survey”

### *Tab A. Instructions and Notes*

1. **Please return the completed survey by January 19, 2011.** Once completed, the file should be returned via email to Jon Van Rhyn (Jon.vanrhyn@sdcounty.ca.gov) with a cc to Leonard Kaye (Lkaye14765@aol.com) no later than 5:00 p.m., Wednesday January 19, 2011. If you have questions or need assistance please contact Jon by email or at 858-495-5133.
2. **Please name the completed file as follows:** The file provided to you contains the word JURISDICTION in its name. Please substitute your individual jurisdiction name for JURISDICTION; there is no need to make any additional changes.
3. **Fill in only the blue highlighted cells.** All other cells have been protected to prevent any inadvertent loss of data. Each of the blue cells should be completed regardless of whether or not it applies. For any that do not, fill in either a “zero” or “N/A” as applicable.
4. **Costs Not Included.** This RRM survey does not include the following costs: (1) reimbursable costs for parking signage and enforcement, which will be claimed as actual costs, (2) vehicle and equipment costs, which will be claimed as actual costs, and (3) costs of materials disposal, which are not reimbursable because they were required under the 2001 permit.
5. **Exclusion of Open Channels.** This RRM survey addresses only "catch basins and inlets"; it does not include costs associated with include the inspection or maintenance of open channels, which will be claimed as actual costs. Results for any facilities considered to be within the category of "catch basins and inlets" should be included in your response.
6. **Inclusion of "First" Inspections and Cleanings.** Although actual claims may not include the "first" annual inspection and cleaning of each catch basin and inlet (these were required in the 2001 permit), your survey results should count these activities. The purpose of the survey is to quantify the typical cost of these activities on a unit basis. It is therefore simpler to include all inspections and cleanings in the survey, and ensures a larger sample size.
7. **Claiming of Costs Applicable to the Mandate.** In some instances (i.e., fuel, or equipment maintenance), Copermittee costs may apply to activities other than those subject to the mandate. In such cases, only the proportion of the cost that applies to the mandate should be claimed.

### *Tab B. Cost Summary Sheet*

8. Based on the information you input in Worksheet C (in-house inspection costs), Worksheet D (In-house cleaning costs), and Worksheet E (Contractor Costs), the Tab B. 2.A. (Cost Summary) spreadsheet will auto-calculate.
9. The only information that needs to be input in Worksheet B is the contact information in Part 1 (General Information).

### ***Tab C. In-house Inspection Costs***

10. **Note 1 (Conveyance System Inspection and Related Costs)**. Please report only the portion of costs allocated to conveyance system inspection or related functions. If these costs are intermingled with cleaning-related costs, please estimate the proportion allocated to inspection functions, and describe the assumptions used to derive this estimate under "Source of Information" (see Note 6)
11. **Note 2 (Staff Person)**. Indicate, by names if possible, and by job classifications, the numbers of your staff persons who perform the indicated inspection functions.
12. **Note 3 (Annual Salary)**. Please report the salary earned by an employee during 2007-08.
13. **Note 4 (Benefit Rate)**. Please indicate the percentage of salary provided by your employer as an employee benefit rate during 2007-08.
14. **Note 5 (Indirect Cost Rate)**. Please use the annual indirect cost or overhead rate as a percentage of salary for FY 2007-08. If none is available use 10%, the State's default rate.
15. **Note 6 (Source of Information)**. Please indicate the documents and assumptions used for reported costs. Also document any assumptions used to derive the reported values.
16. **Note 7 (Source of Inspection Results)**. Please indicate the documents and assumptions used for reported costs.
17. **Note 8 (Reporting)**. Generally includes (1) Reporting and tracking policies and procedures, (2) data tracking and analysis, (3) report writing, and (4) associated supervision and management. For additional explanation, see Section IV.D. of the Copermittees' revised Parameters and Guidelines (11/15/10).
18. **Note 9 (Supervision and Management)**. Time spent by supervisory and management personnel supervising personnel directly responsible for performing the mandated activities.
19. **Note 10 (Employee and Vendor Training)**. The claimant's costs to develop, update, and conduct training on street sweeping policies, procedures, to develop and produce documentation (manuals, forms, etc.), and the training costs of all claimant and vendor employees who perform tasks necessary to implement conveyance system inspection and cleaning and related functions during the life of the Permit.
20. **Note 11 (Equipment Maintenance)**. Annual equipment maintenance costs, including parts, supplies (e.g., water), and personnel costs. This also includes the cost of operating, renting, leasing, or contracting for facilities to store and maintain equipment and supplies.
21. **Note 12 (Contract Management Costs)**. The costs of preparing requests for proposals or requests for bids, negotiating or drafting third party contracts, and subsequently administering service contracts for the time they are performing these tasks. For Worksheets C and D, contract management costs should only include those necessary to carry out the Copermittees' in-house conveyance system inspection and cleaning activities (e.g., contracted equipment use, waste disposal, etc.). Contract costs associated with contractor inspection and cleaning activities are included in Worksheet E (See Note 19).
22. **Note 14 (Vehicle and Equipment Maintenance)**. Annual maintenance costs, including parts, supplies (e.g., water), and personnel costs. This also includes the cost of operating, renting, leasing, or contracting for facilities to store and maintain vehicles, equipment, and supplies.
23. **Note 15 (Fuel)**. The actual cost of fuel necessary to run the conveyance system inspection and cleaning equipment and equipment used to transport collected materials.

### ***Tab D. In-house Cleaning Costs***

24. **Note 16 (Conveyance System Cleaning Operations and Related Costs)**. Please report only the portion of costs allocated to conveyance system cleaning or related functions. If these costs are intermingled with inspection-related costs, please estimate the proportion allocated to cleaning functions, and describe the assumptions used to derive this estimate under "Source of Information" (see Note 6)
25. **Note 2 (Staff Person)**. Indicate, by names if possible, and by job classifications, the numbers of your staff persons who perform the indicated inspection functions.
26. **Note 3 (Annual Salary)**. Please report the salary earned by an employee during 2007-08.
27. **Note 4 (Benefit Rate)**. Please indicate the percentage of salary provided by your employer as an employee benefit rate during 2007-08.
28. **Note 5 (Indirect Cost Rate)**. Please use the annual indirect cost or overhead rate as a percentage of salary for FY 2007-08. If none is available use 10%, the State's default rate.
29. **Note 6 (Source of Information)**. Please indicate the documents and assumptions used for reported costs. Also document any assumptions used to derive the reported values.
30. **Note 7 (Source of Cleaning Results)**. Please indicate the documents and assumptions used to derive the reported values.

#### ***Tab E. Contractor Costs***

31. **Note 17 (Contractor Costs)**. Please allocate a portion of the cost associated with conveyance system inspections and a portion with conveyance system cleaning functions. If these costs are intermingled, please estimate the proportion allocated to each, and describe the assumptions used to derive these estimates under "Source of Contract Cost Information" (see Note 6). Also please note that contract costs do not allow for itemization of specific costs (e.g., fuel, equipment maintenance, etc.). For the purposes of this survey, it is assumed that such costs are included within the broader categories of "Conveyance System Inspection" and "Conveyance System Cleaning." If such itemization is part of your contract activities, please indicate
32. **Note 18 (Supplemental In-house Costs)**. This section includes in-house personnel and non-personnel costs incurred in supporting contractors' mandated services. Note: It is not intended to replace Worksheets C and D, which correspond to all activities related to in-house inspections and cleaning. Worksheet E should describe only those supplemental activities related to contract inspection and cleaning.
33. **Note 10 (Contract Management Costs)**. Costs of managing conveyance system inspection and cleaning contracts.
34. **Note 6 (Source of Information)**. Please indicate the documents and assumptions used for reported costs. Also document any assumptions used to derive the reported values.
35. **Note 7 (Source of Inspection and Cleaning Results)**. Please indicate the documents and assumptions used to derive the reported values.
36. **Note 19 (Contract Management Costs)**. The costs of preparing requests for proposals or requests for bids, negotiating or drafting third party contracts, and subsequently administering service contracts for the time they are performing these tasks. For Worksheet E, contract management costs should only include those necessary to carry out the contracted conveyance system inspection and cleaning activities. Contract costs associated with in-house inspection and cleaning activities (e.g., contracted equipment use, waste disposal, etc.) are included in Worksheets C and D (See Note 12).

**Worksheet B: Unit Cost Summary Sheet**

<b>Part 1: General Information</b>			
Jurisdiction :	City or County	Alternate:	Susan Jones
Contact Person :	John Smith	Phone:	619-123-1237
Phone :	619-123-1234	E-Mail:	Susan.Jones@city.gov
E-Mail :	John.smith@city.gov		

	FY 2007-08		FY 2008-09		FY 2009-10	
	Inspections	Cleanings	Inspections	Cleanings	Inspections	Cleanings
<b>Part 2: Cost Information</b>						
<b>A. In-house Costs (complete Worksheets C and D)</b>						
<u>Personnel Costs</u>						
Conveyance System Inspection	\$324,037		\$445,010		\$572,951	
Conveyance System Cleaning Operations		\$0		\$0		\$0
Reporting	\$3,079	\$0	\$3,171	\$0	\$3,266	\$0
Employee Supervision and Management	\$8,349	\$0	\$10,749	\$0	\$13,286	\$0
Employee and Vendor Training	\$0	\$0	\$0	\$0	\$0	\$0
Equipment Maintenance	\$0	\$0	\$0	\$0	\$0	\$0
Contract Management	\$0	\$0	\$0	\$0	\$0	\$0
<u>Non-personnel Costs</u>						
Equipment Maintenance	\$52,394	\$0	\$82,914	\$0	\$98,900	\$0
Fuel	\$0	\$0	\$0	\$0	\$0	\$0
Training Materials and Supplies	\$0	\$0	\$0	\$0	\$0	\$0
<b>Total In-house Costs</b>	<b>\$387,858</b>	<b>\$0</b>	<b>\$541,844</b>	<b>\$0</b>	<b>\$688,403</b>	<b>\$0</b>
<b>B. Contractor Costs (complete Worksheet E)</b>						
Conveyance System Inspection Contract	\$0		\$2		\$2	
Conveyance System Cleaning Operations Contract		\$0		\$0		\$0
Reporting	\$3,079	\$0	\$2	\$0	\$2	\$0
Contract Management	\$8,349	\$0	\$10,749	\$3	\$13,286	\$0
Employee and Vendor Training	\$0	\$1	\$0	\$0	\$0	\$0
Vehicle and Equipment Maintenance	\$0	\$2	\$2	\$2	\$2	\$2
<u>Non-personnel Costs</u>						
Vehicle and Equipment Maintenance	\$0	\$0	\$0	\$0	\$0	\$0
Fuel	\$0	\$0	\$1	\$0	\$0	\$1
Training Equipment and Supplies	\$1	\$1	\$0	\$1	\$1	\$0
<b>Total Contract Costs</b>	<b>\$11,428</b>	<b>\$4</b>	<b>\$10,756</b>	<b>\$6</b>	<b>\$13,293</b>	<b>\$3</b>
<b>Total Costs (In-house + Contractor)</b>	<b>\$399,286</b>	<b>\$4</b>	<b>\$552,600</b>	<b>\$6</b>	<b>\$701,696</b>	<b>\$3</b>

<b>Part 3: Inspection and Cleaning Totals (Note 3)</b>						
<b>Inspection Results</b>						
<b>a. In-house Results</b>						
Number of Inspections	2		2		2	
Unit Cost per Inspection	\$193,928.87		\$270,921.91		\$344,201.40	
<b>b. Contract Results</b>						
Number of Inspections	450		450		450	
Unit Cost per Inspection	\$25.40		\$23.90		\$29.54	
<b>c. Combined Results</b>						
Number of Inspections	452		452		452	
Unit Cost per Inspection	\$883.38		\$1,222.57		\$1,552.42	
<b>Cleaning Results</b>						
<b>a. In-house Results</b>						
Number of Cleanings		1		1		1
Unit Cost per Cleaning		\$0.00		\$0.00		\$0.00
<b>b. Contract Results</b>						
Number of Cleanings		250		225		200
Unit Cost per Cleaning		\$0.02		\$0.03		\$0.02
<b>c. Combined Results</b>						
Number of Cleanings		251		226		201
Unit Cost per Cleaning		\$0.02		\$0.03		\$0.01

**Worksheet C: In-house Conveyance System Inspection Costs and Results**

Annualized FY 2007-08 Salary Information							Personnel Cost Calculations						Source of Information (Note 6)	
							FY 2007-08 Personnel Costs		FY 2008-09 Personnel Costs		FY 2009-10 Personnel Costs			
<u>Staff Person</u> (Note 2)	<u>Job Classification</u>	<u>Number</u> <u>in Class</u>	<u>Annual</u> <u>Salary</u> (Note 3)	<u>Benefit</u> <u>rate (%)</u> (Note 4)	<u>Indirect</u> <u>cost rate</u> <u>%</u> (Note 5)	<u>Salaries,</u> <u>Benefits,</u> <u>Indirect</u> <u>Totals</u>	<u>% of time</u> <u>dedicated to</u> <u>inspections</u>	<u>Annual cost</u> <u>for</u> <u>inspections</u>	<u>% of time</u> <u>dedicated to</u> <u>inspections</u>	<u>Annual cost</u> <u>for</u> <u>inspections</u>	<u>% of time</u> <u>dedicated to</u> <u>inspections</u>	<u>Annual cost</u> <u>for</u> <u>inspections</u>		
<b>Part 1: Conveyance System Inspection Costs (Note 1)</b>														
Use lines 1-20 if auto-calculating annual inspection costs for each year														
1	Division I Stormwater	Equipment Operator	9	\$80,546	0	49	\$120,014	15	\$162,018	20	\$222,505	25	\$286,475	Source of Inspection Cost Information Based on the FY 07-08 Blended Labor Rates. \$46/hour for 1751 productive hours for each staff.
2	Division II Stormwater	Equipment Operator	9	\$80,546	0	49	\$120,014	15	\$162,018	20	\$222,505	25	\$286,475	
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
6	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
21	Use line 21 if inserting total inspection costs for each year								\$0		\$0		\$0	
<b>TOTALS</b>								\$324,037		\$445,010		\$572,951		

Annualized FY 2007-08 Salary Information							FY 2007-08 Personnel Costs		FY 2008-09 Personnel Costs		FY 2008-09 Personnel Costs		Source of Information (Note 6)	
							<u>% of time</u> <u>dedicated to</u> <u>function</u>	<u>Annual cost</u> <u>of function</u>	<u>% of time</u> <u>dedicated to</u> <u>function</u>	<u>Annual cost</u> <u>of function</u>	<u>% of time</u> <u>dedicated to</u> <u>function</u>	<u>Annual cost</u> <u>of function</u>		
<u>Staff Person</u> (Note 2)	<u>Job Classification</u>	<u>Number</u> <u>in Class</u>	<u>Annual</u> <u>Salary</u> (Note 3)	<u>Benefit</u> <u>rate (%)</u> (Note 4)	<u>Indirect</u> <u>cost rate</u> <u>%</u> (Note 5)	<u>Salaries,</u> <u>Benefits,</u> <u>Indirect</u> <u>Totals</u>	<u>% of time</u> <u>dedicated to</u> <u>function</u>	<u>Annual cost</u> <u>of function</u>	<u>% of time</u> <u>dedicated to</u> <u>function</u>	<u>Annual cost</u> <u>of function</u>	<u>% of time</u> <u>dedicated to</u> <u>function</u>	<u>Annual cost</u> <u>of function</u>		
<b>Part 2: Other Personnel Costs Related to Conveyance System Inspections (Note 1)</b>														
a. Reporting (Note 8)														
Use lines 1-5 to auto-calculate annual reporting costs for each year														
1	Vanessa Cabling	Administrative Analyst	1	\$103,309	0	49	\$153,930	2	\$3,079	2	\$3,171	2	\$3,266	Source of Reporting Cost Information Based on the FY 07-08 Blended Labor Rates. \$59/hour for 1751 productive hours.
2	Multiple	Enter Job Classification	4	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
6	Use line 6 to insert total reporting costs for each year								\$0		\$0		\$0	
<b>Reporting Totals</b>								\$3,079		\$3,171		\$3,266		

Note: Only report statistics for catch basins and inlets. Do not include inspections of open channels.



**Worksheet C: In-house Conveyance System Inspection Costs and Results**

**b. Supervision and Management (Note 9)**

Use lines 1-5 if auto-calculating annual supervision and management costs for each year

1	Thomas Herzberger	LUEG Program Manager	1	\$140,080	0	49	\$208,719	4	\$8,349	5	\$10,749	6	\$13,286
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
6	Use line 6 if inserting total supervision and management costs for each year								\$0	\$0	\$0	\$0	
<b>Supervision and Management Totals</b>									<b>\$8,349</b>	<b>\$10,749</b>	<b>\$13,286</b>		

**Source of Supervision & Management Cost Information**

Based on the FY 07-08 Blended Labor Rates. \$80/hour for 1751 productive hours.

**c. Employee and Vendor Training (Note 10)**

Use lines 1-5 if auto-calculating annual training costs for each year

1	Enter Name	Supervisor (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
6	Use line 6 if inserting total training costs for each year								\$0	\$0	\$0		
<b>Training Totals</b>									<b>\$0</b>	<b>\$0</b>	<b>\$0</b>		

**Source of Training Cost Information**

Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.

**d. Vehicle and Equipment Maintenance (Note 11)**

Use lines 1-5 if auto-calculating annual equipment maintenance costs for each year

1	Enter Name	Equip. Operator (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
6	Use line 6 if inserting total equipment maintenance costs for each year								\$0	\$0	\$0		
<b>Equipment Maintenance Totals</b>									<b>\$0</b>	<b>\$0</b>	<b>\$0</b>		

**Source of Equipment Maintenance Cost Information**

Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.

**e. Contract Management (Note 12)**

Use lines 1-5 if auto-calculating annual contract management costs for each year

1	Enter Name	Analyst II (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0

**Source of Contract Management Cost Information**

Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.

Note: Only report statistics for catch basins and inlets. Do not include inspections of open channels.

**Worksheet C: In-house Conveyance System Inspection Costs and Results**

5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
6	Use line 6 if inserting total contract management costs for each year													
									<b>Contract Management Totals</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>		

Note: Only report statistics for catch basins and inlets. Do not include inspections of open channels.

**Worksheet C: In-house Conveyance System Inspection Costs and Results**

<b>Part 3: Non-Personnel Costs Related to Conveyance System Inspections (Note 1)</b>					
		<b>FY 2007-08</b>	<b>FY 2008-09</b>	<b>FY 2009-10</b>	<b>Source of Non-personnel Cost Information</b> A percentage of Oracle's total equipment charges for vehicles and equipment for Divisions I and II Stormwater Crews. (15%, 20%, 25% for the consecutive fiscal years)
1	Vehicle and Equipment Maintenance (Note 14)	\$52,394	\$82,914	\$98,900	
2	Fuel (Note 15)	\$0	\$0	\$0	
3	Training Materials and Supplies (Note 10)	\$0	\$0	\$0	
	<b>Total</b>	\$52,394	\$82,914	\$98,900	

<b>Part 4: Total Costs (Personnel + Non-personnel)</b>				
		<b>FY 2007-08</b>	<b>FY 2008-09</b>	<b>FY 2009-10</b>
		\$387,858	\$541,844	\$688,403

<b>Part 5: Inspection Results</b>					
		<b>FY 2007-08</b>	<b>FY 2008-09</b>	<b>FY 2009-10</b>	<b>Source of Inspection Results (Note 7)</b> Identify the source of inspection results. Also use this space to document any assumptions used to calculate inspection results.
	Number of Inspections	2	2	2	
	Unit Cost per Inspection	#####	#####	#####	

Note: Only report statistics for catch basins and inlets. Do not include inspections of open channels.

**Worksheet D: In-house Conveyance System Cleaning Costs and Results**

Annualized FY 2007-08 Salary Information							Personnel Cost Calculations						Source of Information (Note 6)	
							FY 2007-08 Personnel Costs		FY 2008-09 Personnel Costs		FY 2009-10 Personnel Costs			
<u>Staff Person</u> <u>(Note 2)</u>	<u>Job Classification</u>	<u>Number</u> <u>in Class</u>	<u>Annual</u> <u>Salary</u> <u>(Note 3)</u>	<u>Benefit</u> <u>rate (%)</u> <u>(Note 4)</u>	<u>Indirect</u> <u>cost rate</u> <u>(Note 5)</u>	<u>Salaries,</u> <u>Benefits,</u> <u>Indirect</u> <u>Totals</u>	<u>% of time</u> <u>dedicated to</u> <u>inspections</u>	<u>Annual cost</u> <u>for cleaning</u>	<u>% of time</u> <u>dedicated to</u> <u>inspections</u>	<u>Annual cost</u> <u>for cleaning</u>	<u>% of time</u> <u>dedicated to</u> <u>inspections</u>	<u>Annual cost</u> <u>for cleaning</u>	Source of Cleaning Cost Information Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.	
1	Enter Name	Equip. Operator (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0		\$0
2	Multiple	Enter Job Classification	4	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
6	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
7	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
21	Use line 21 if inserting total inspection costs for each year								\$0		\$0		\$0	
							<b>TOTALS</b>	\$0		\$0		\$0		

**Part 1: Conveyance System Cleaning Operations Costs (Note 16)**

**Part 2: Other Personnel Costs Related to Conveyance System Cleaning (Note 16)**

Annualized FY 2007-08 Salary Information							Costs		Costs		Costs		Source of Information (Note 6)	
<u>Staff Person</u> <u>(Note 2)</u>	<u>Job Classification</u>	<u>Number</u> <u>in Class</u>	<u>Annual</u> <u>Salary</u> <u>(Note 3)</u>	<u>Benefit</u> <u>rate (%)</u> <u>(Note 4)</u>	<u>Indirect</u> <u>cost rate</u> <u>(Note 5)</u>	<u>Salaries,</u> <u>Benefits,</u> <u>Indirect</u> <u>Totals</u>	<u>% of time</u> <u>dedicated to</u> <u>function</u>	<u>Annual cost</u> <u>of function</u>	<u>% of time</u> <u>dedicated to</u> <u>function</u>	<u>Annual cost</u> <u>of function</u>	<u>% of time</u> <u>dedicated to</u> <u>function</u>	<u>Annual cost</u> <u>of function</u>		
1	Enter Name	Analyst (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	Source of Reporting Cost Information Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.
2	Multiple	Enter Job Classification	4	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	

**a. Reporting (Note 8)**

Note: Only report statistics for catch basins and inlets. Do not include cleaning of open channels.

**Worksheet D: In-house Conveyance System Cleaning Costs and Results**

6 Use line 6 to insert total reporting costs for each year		\$0		\$0		\$0	
	<b>Reporting Totals</b>	<b>\$0</b>		<b>\$0</b>		<b>\$0</b>	

Note: Only report statistics for catch basins and inlets. Do not include cleaning of open channels.

**Worksheet D: In-house Conveyance System Cleaning Costs and Results**

**b. Supervision and Management (Note 9)**

Use lines 1-5 if auto-calculating annual supervision and management costs for each year

1	Enter Name	Program Mgr (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
6	Use line 6 if inserting total supervision and management costs for each year								\$0		\$0		\$0
<b>Supervision and Management Totals</b>								<b>\$0</b>		<b>\$0</b>		<b>\$0</b>	

**Source of Supervision & Management Cost Information**  
Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.

**c. Employee and Vendor Training (Note 10)**

Use lines 1-5 if auto-calculating annual training costs for each year

1	Enter Name	Supervisor (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
6	Use line 6 if inserting total training costs for each year								\$0		\$0		\$0
<b>Training Totals</b>								<b>\$0</b>		<b>\$0</b>		<b>\$0</b>	

**Source of Training Cost Information**  
Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.

**d. Vehicle and Equipment Maintenance (Note 11)**

Use lines 1-5 if auto-calculating annual equipment maintenance costs for each year

1	Enter Name	Equip. Operator (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
6	Use line 6 if inserting total equipment maintenance costs for each year								\$0		\$0		\$0
<b>Equipment Maintenance Totals</b>								<b>\$0</b>		<b>\$0</b>		<b>\$0</b>	

**Source of Equipment Maintenance Cost Information**  
Describe source of salary and personnel cost information. Also use this space to document any assumptions used to calculate costs.

**e. Contract Management (Note 12)**

Use lines 1-5 if auto-calculating annual contract management costs for each year

1	Enter Name	Analyst II (example)	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
2	Multiple	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0
3	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0

**Source of Contract Management Cost Information**  
Describe source of salary and personnel cost information. Also use this space to document any assumptions used to

Note: Only report statistics for catch basins and inlets. Do not include cleaning of open channels.

**Worksheet D: In-house Conveyance System Cleaning Costs and Results**

4	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	calculate costs.
5	Enter Name	Enter Job Classification	1	\$0	0	10	\$0	0	\$0	0	\$0	0	\$0	
6	Use line 6 if inserting total contract management costs for each year						\$0		\$0		\$0			
<b>Contract Management Totals</b>							<b>\$0</b>		<b>\$0</b>		<b>\$0</b>			

Note: Only report statistics for catch basins and inlets. Do not include cleaning of open channels.

**Worksheet D: In-house Conveyance System Cleaning Costs and Results**

**Part 3: Non-Personnel Costs Related to Conveyance Cleaning**

		FY 2007-08	FY 2008-09	FY 2009-10	Source of Non-personnel Cost Information
1	Vehicle and Equipment Maintenance (Note 14)	\$0	\$0	\$0	Describe source of non-personnel cost information. Also use this space to document any assumptions used to determine non-personnel costs.
2	Fuel (Note 15)	\$0	\$0	\$0	
3	Training Materials and Supplies (Note 10)	\$0	\$0	\$0	
	<b>Total</b>	\$0	\$0	\$0	

**Part 4: Total Costs (Personnel + Non-personnel)**

FY 2007-08	FY 2008-09	FY 2009-10
\$0	\$0	\$0

**Part 5: Cleaning Results**

	FY 2007-08	FY 2008-09	FY 2009-10	Source of Cleaning Results (Note 17)
Number of Cleanings	1	1	1	Identify the source of inspection results. Also use this space to document any assumptions used to calculate cleaning results.
<b>Unit Cost per Cleaning</b>	\$ -	\$ -	\$ -	

Note: Only report statistics for catch basins and inlets. Do not include cleaning of open channels.



**Worksheet E: Contractor Costs and Results**

		FY 2007-08		FY 2008-09		FY 2009-10	
		Inspections	Cleanings	Inspections	Cleanings	Inspections	Cleanings
<b>Part 1: Contract Costs</b>							
<u>Contractor Costs (Note 17)</u>							
1	Conveyance System Inspection (Note 1)	\$0		\$2		\$2	
2	Conveyance System Cleaning (Note 16)		\$0		\$0		\$0
<u>Supplemental In-house Costs (Note 18)</u>							
<i>Personnel Costs</i>							
1	Reporting (Note 8)	\$3,079	\$0	\$2	\$0	\$2	\$0
2	Contract Management (Note 19)	\$8,349	\$0	\$10,749	\$3	\$13,286	\$0
3	Employee and Vendor Training (Note 10)	\$0	\$1	\$0	\$0	\$0	\$0
4	Vehicle and Equipment Maintenance (Note 14)	\$0	\$2	\$2	\$2	\$2	\$2
<i>Non-personnel Costs</i>							
1	Vehicle and Equipment Maintenance (Note 14)	\$0	\$0	\$0	\$0	\$0	\$0
2	Fuel (Note 15)	\$0	\$0	\$1	\$0	\$0	\$1
3	Training Materials and Supplies (Note 10)	\$1	\$1	\$0	\$1	\$1	\$0
<b>Total Contract Costs</b>		<b>\$11,428</b>	<b>\$4</b>	<b>\$10,756</b>	<b>\$6</b>	<b>\$13,293</b>	<b>\$3</b>

**Source of Contract Cost Information (Note 6)**

Describe source of contract cost information. Also use this space to document any assumptions used to calculate costs.

		FY 2007-08		FY 2008-09		FY 2009-10	
		Inspections	Cleanings	Inspections	Cleanings	Inspections	Cleanings
<b>Part 2: Inspection and Cleaning Results</b>							
<b>Inspections</b>							
	Number of Inspections	450		450		450	
	Unit Cost per Inspection	\$ 25.40		\$ 23.90		\$ 29.54	
<b>Cleanings</b>							
	Number of Cleanings		250		225		200
	Unit Cost per Cleaning		\$ 0.02		\$ 0.03		\$ 0.02

**Source of Inspection and Cleaning Results (Note 7)**

Describe source of inspection and cleaning results. Also use this space to document any assumptions used to calculate inspection and cleaning results.

**Activity**

Cleaning Costs

In-house # of inspections

In-house # of cleanings

Contract # of inspections

Contract # of cleanings

Contractor Cost - Contract Management

Contractor Costs - Reporting

In-house non-personnel fuel

**Comment**

No cleaning cost reported at all.

actual number not reported

actual number not reported

appears numbers not added, looks like default from template. Did any contract work occur?

appears numbers not added, looks like default from template. Did any contract work occur?

Where contract used for inspection and/or cleanings?

Where contract used for reporting? Appears to be a duplicate to in-house reporting costs

Are fuel charges included as maintenance?

DECLARATION OF JOHN QUENZER  
IN SUPPORT OF REASONABLE REIMBURSEMENT METHODOLOGY  
07-TC-09-R – Response to State Comments

I, John Quenzer, declare as follows:

**BACKGROUND**

1. I am over the age of 18. I have personal knowledge of the facts set forth below and, if called as a witness, I could testify competently to all of the facts set forth herein.
2. Except as otherwise stated, the facts set forth herein are known to me personally or have been determined by my review of public records or official records maintained by either D-Max Engineering, Inc. (“D-Max”) or the County of San Diego (“County”) in the ordinary course of business. All records reviewed were maintained by authorized personnel, or persons acting under their control, in the ordinary course of business at or near the time of the act, condition, or event described therein. If called to testify as a witness, I could and would testify competently thereto.
3. I am a Principal Scientist at D-Max. I have a Masters of Science in Environmental Engineering and Science from Johns Hopkins University and a Bachelor of Science in Environmental Chemistry from the University of California, San Diego. I am also a Certified Professional in Storm Water Quality (“CPSWQ”) and a Qualified Stormwater Pollution Prevention Plan (“SWPPP”) Developer (“QSD”)/Qualified SWPPP Practitioner (“QSP”). A copy of my resume is included in the D-Max Supporting Documents filed in the Claimants’ Comments on the Draft Proposed Decision and Parameters and Guidelines<sup>1</sup> Volume 14, pages 1-7.
4. I have worked at D-Max Engineering for twenty (20) years. During this time, my work has focused on storm water management for municipal agencies in Southern California, mainly within San Diego County.
5. During my time at D-Max, I have worked on numerous projects for the County of San Diego, Cities of Carlsbad, Del Mar, Imperial Beach, Lemon Grove, Poway, San Marcos, Santee, Solana Beach, Chula Vista, Coronado, El Cajon, Encinitas, Escondido, La Mesa, National City, Oceanside, San Diego, Vista, San Diego County Regional Airport Authority, and the San Diego Unified Port District (“Co-Permittees”) to implement the requirements of Order No. R9-2007-0001, issued by the San Diego Regional Water Quality Control Board (“2007 Permit”) and Order No. R9-2013-0001, as amended (“2013 Permit”). I have served as an extension of staff managing storm water programs for the Cities of National City, Lemon Grove, and Santee. I have prepared and updated Jurisdictional Urban Runoff Management Program (“JURMP”) and/or associated annual reports for more than half of the San Diego Co-Permittees. I regularly attended regional and watershed meetings for Co-Permittees collaboration, typically representing the City of National City. I have also worked with 16 of the 19 municipal Co-Permittees (those

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<sup>1</sup> Citations to the Claimants’ Comments on the Draft Proposed Decision and Parameters and Guidelines Volumes filed on February 20, 2024 will be referred as “Volume”.

other than San Diego County Regional Airport Authority and San Diego Unified Port District) on other various stormwater program needs during this time. My experience includes completing projects in each of the following areas:

- a. The 2007 Permit's JURMP, including the collaboration involved in developing and implementing the JURMPs; the requirement to include street sweeping and conveyance system cleanings in the annual reports; and the requirement to educate target community members on erosion prevention, non-stormwater discharge prohibitions, BMP types, high-risk behaviors;
  - b. The 2007 Permit's Watershed Urban Runoff Management Program ("WURMP"), including the watershed activities included in the WURMPs and the collaboration involved in developing and implementing the WURMPs for each watershed;
  - c. Regional Urban Runoff Management Program ("RURMP"), including the collaboration involved in developing and implementing the RURMP, the RURMP's education program, and the RURMP's fiscal analysis method;
  - d. Meetings held and attended by Co-Permittees to promote consistency among the 2007 Permit's JURMP and WURMP, and to plan and coordinate activities required under the permit; and
  - e. The 2007 Permit's Program effectiveness assessment and long term effectiveness assessment requirements.
6. In 2023, the County of San Diego, Cities of Carlsbad, Del Mar, Imperial Beach, Lemon Grove, Poway, San Marcos, Santee, Solana Beach, Chula Vista, Coronado, El Cajon, Encinitas, Escondido, La Mesa, National City, Oceanside, San Diego, and Vista (collectively, "Municipal Claimants") retained me and D-Max to assist in developing a reasonable reimbursement methodology.

## **DOCUMENTS OBTAINED AND REVIEWED**

7. In my role as a consultant to all Municipal Claimants in connection with the development of a reasonable reimbursement methodology, I requested, received, and reviewed documents created and maintained by the County in the ordinary course of business which evidence their activities to implement each of the programs described above, and the costs associated with those activities, including but not limited to the following documents:
- a. County 2011 Co-Permittee Surveys (Vol. 1, pp. 1-376 and Declaration of Lara Barrett<sup>2</sup> Exhibits A and B).

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<sup>2</sup> The County of San Diego's Co-Permittee surveys that included catch basin cleaning and reporting costs was inadvertently left out of the original submittal, but the standard cost was developed based on a data set including the County's data. The County's surveys are referred to as County 2011 County Permittee Survey 2 and are being submitted as part of Lara Barrett's declaration.

- b. Co-Permittee Declarations (Vol. 1, pp. 377-743).
- c. JURMP Annual Reports (Vols. 2-11).
- d. Water Quality Improvement Project (“WQIP”) Annual Reports (Vol. 12).
- e. WURMP Annual Reports (Vol. 13, pp 1-10756).
- f. County Fiscal Analysis Documents (Vol. 13, pp. 10757-10784).
- g. Cost-Sharing Memorandums of Understanding (“MOUs”) (Vol. 13, pp. 10785-10907).
- h. County Watershed Workgroup Expenditure Records (Vol. 13, pp. 10908-10916).
- i. Regional Cost Sharing Documentation (Vol. 13, pp. 10917-13074)
- j. D-Max Files (Vol. 14, pp. 8-189).

These documents included cost information from a representative sample of the Co-Permittees.

8. In my role as a consultant to all Municipal Claimants in connection with the development of a reasonable reimbursement methodology, I also reviewed the following documents:
  - a. Finance’s Comments on the Draft Proposed Decision and Parameters and Guidelines filed October 14, 2024.
  - b. Controller’s Comments on the Draft Proposed Decision and Parameters and Guidelines filed October 14, 2024.
  - c. Water Board’s Comments on the Draft Proposed Decision and Parameters and Guidelines (Volumes 1-3) filed October 14, 2024.

These documents included comments from the Department of Finance, State Controller’s Office, and State Water Quality Control Board and the San Diego Regional Water Quality Control Board (hereinafter referred to as “State Comments”) relating to the reasonable reimbursement methodology.

9. I considered these documents, the State Comments, and the variation in costs among Co-Permittees to implement the state mandates to create and then revise the reasonable reimbursement methodologies (“RRM”) for each reimbursable activity described in the Draft Proposed Decision and Parameters and Guidelines for Test Claim 07-TC-09-R (“Test Claim Mandate”) based on general allocation formulas, uniform cost allowances, and other approximations of Co-Permittee costs to implement the Test Claim Mandates.
10. In the following sections, I describe how I developed the reasonable reimbursement methodology or formula for reimbursing the Co-Permittees for each Test Claim Mandate

for the 2007 Permit. Additionally, in response to the State Responses, I have made a few minor revisions to the RRM descriptions and have added additional detail to the RRM descriptions.

### REIMBURSEMENT FORMULAE

11. For the purpose of the below reimbursement formulas, the below general information should apply.

- a. Reimbursement formulae provide an outline of how the Co-Permittees will submit claims for reasonable reimbursement.
- b. All costs and monetary values are in United States dollars.
- c. The term “fiscal year” (FY) means the period from July 1 of one year to June 30 of the next year. For example, FY 2007/2008 is the period from July 1, 2007 to June 30, 2008. Common conventions for referring to fiscal years used by the Co-Permittees include FY [Year 1]/[Year 2] (e.g., FY 2007/2008), [Year 1]/[Year 2] (e.g., 2007/2008), [last two digits of Year 1]/[last two digits of Year 2] (e.g., 07/08), FY [Year 2] (FY 2008), or FY[last two digits of Year 2] (e.g., FY08).
- d. Reimbursement formulae are articulated with summation notation to indicate the time frame in which the unfunded mandate was imposed as described below:

$$\sum_{t=Year A}^{Year B} [x]_{t,c}$$

In this formula,  $x$  shall refer to the specific unfunded mandate element in question,  $t$ , for time, refers to the fiscal year where the mandate applied, and  $c$ , refers to values specific to the individual Co-Permittee. The reimbursement formulae shall be used as a tool for the Co-Permittees to make individual claims, which would occur after approval of reasonable reimbursement methodologies.

- e. The time periods considered for the reimbursement formulae included below represent three distinct periods during which activities performed by the Co-Permittees (and outlined by the Permit) can be considered unfunded mandates:
  - i. Between the effective date of 2007 Permit (January 24, 2007) to March 23, 2008, which is the day before updated JURMPs prepared per the 2007 Permit were required to be implemented.
  - ii. From March 24, 2008, to June 26, 2013, which is the day before the effective date of the 2013 Permit.
  - iii. June 27, 2013, which is the effective day of the 2013 Permit, to June 26, 2015, which is the day before the 2013 Permit required Co-Permittees to submit and begin implementing Jurisdictional Runoff Management Programs (“JRMP”) updated to meet 2013 Permit requirements. Provision

E of the 2013 Permit states that Co-Permittees (and other parties subject to the 2013 Permit) were required to continue implementing their existing jurisdictional programs (i.e., JURMPs prepared per the 2007 Permit requirements) until they began implementing their new JRMPs prepared per the 2013 Permit requirements.

- f. Where the unit costs utilized in reimbursement formulae are increased annually by the San Diego-Carlsbad Consumer Price Index for all urban consumers, not seasonally adjusted (“CPI”), the annual increase shall follow the adjustment in the table below. The CPI adjustment values were determined by referencing the Historic Consumer Price Index values, CPI for all Urban Consumers in the San Diego-Carlsbad, CA area, reported by the US Bureau of Labor Statistics<sup>3</sup> and calculating the ratio of the CPI for a given year to the CPI reported for a given base year.

Since the BLS reports CPI on a calendar year basis rather than a fiscal year basis, the year used to determine the adjustment ratio for a given fiscal year was the earlier calendar year included in the fiscal year.

<b>Fiscal Year</b>	<b>CPI Adjustment (Ratio), 2007/2008 Base</b>	<b>CPI Adjustment (Ratio), 2008/2009 Base</b>	<b>CPI Adjustment (Ratio), 2009/2010 Base</b>	<b>Reported San Diego CPI-U</b>	<b>Year (for CPI-U value)</b>
FY 2006/2007	0.9776	0.9413	0.9415	228.100	2006
FY 2007/2008	1.0000	0.9629	0.9631	233.321	2007
FY 2008/2009	1.0385	1.0000	1.0002	242.313	2008
FY 2009/2010	1.0384	0.9998	1.0000	242.270	2009
FY 2010/2011	1.0520	1.0130	1.0132	245.464	2010
FY 2011/2012	1.0840	1.0437	1.0439	252.910	2011
FY 2012/2013	1.1013	1.0605	1.0606	256.961	2012
FY 2013/2014	1.1157	1.0743	1.0745	260.317	2013
FY 2014/2015	1.1364	1.0942	1.0944	265.145	2014

12. Reporting on Street Sweeping and Conveyance System Cleaning (Part J.3.a.(3)(c) (iv)-(viii), (x)-(xv)).

The total reimbursement for this category is determined by combining the cost to report on the conveyance system cleaning and street sweeping as described below. Formulae to calculate these costs and details about the period considered for summation of costs and rationale for selection of inputs to these formulae are provided below.

<sup>3</sup> [https://data.bls.gov/pdq/SurveyOutputServlet?data\\_tool=dropmap&series\\_id=CUURS49ESA0.CUUSS49ESA0](https://data.bls.gov/pdq/SurveyOutputServlet?data_tool=dropmap&series_id=CUURS49ESA0.CUUSS49ESA0)



a. Period considered for summation of costs for this category

The period of summation for reporting on street sweeping and conveyance system cleaning is from March 24, 2008, which is the date that Co-Permittees were required to begin implementing their JURMP developed per the 2007 Permit requirements, to, June 26, 2013, which is the day before the effective date of the 2013 Permit. Street sweeping and conveyance system cleaning reporting are part of the JURMP. While per Provision E of the 2013 Permit each Co-Permittee was required to continue implementing its 2007 Permit JURMP until the new JRMP required by the 2013 Permit was implemented (by June 27, 2015), based on my experience the San Diego Regional Water Quality Control Board (“San Diego Water Board”) allowed Co-Permittees to stop reporting on street sweeping and conveyance system cleaning after the 2013 Permit went into effect. Specifically, for jurisdictional annual reports due after the effective date of the 2013 Permit, the San Diego Water Board allowed Co-Permittees to submit the simplified two-page JRMP annual report included in the 2013 Permit instead of the much longer JURMP annual reports required under the 2007 Permit. The simplified 2013 JRMP annual report does not require conveyance system cleaning or street sweeping to be reported. Some Co-Permittees continued to prepare longer, 2007 Permit style JURMP annual reports that did include street sweeping and conveyance system reporting after the effective date of the 2013 Permit, but to be conservative that reporting cost is not included in the proposed reimbursement methodology.

In accordance with the above reimbursement period, the following conservative adjustments are proposed to the street sweeping and reporting costs for the 2007/2008 and 2012/2013 fiscal years. The 2007/2008 reporting cost claimed should be 27.05% of the standard unit cost for reporting. This reflects that 99 days of the 366 days in fiscal year 2007/2008 were on or after March 24, 2008. The 2012/2013 reporting cost claimed should be 98.90% of the standard unit cost for reporting. This reflects that 361 of the 365 days in fiscal year 2012/2013 were on or before June 26, 2013.

b. Rationale for selection of cost formula formats used for this category

A standard unit cost approach was used for both conveyance cleaning reporting and street sweeping reporting because information about these costs were available from a subset of, but not all, Co-Permittee. Further, in my experience preparing and reviewing stormwater fiscal analysis reporting for Co-Permittee and based on my review of the reporting surveys submitted by Co-Permittee (see references in items 12.c and 12.d below), Co-Permittee staff time and cost tracking systems do not break out conveyance system reporting and street sweeping reporting into separate, distinct categories such that reporting actual costs would be reasonably feasible for these activities. The reason that the cost reporting surveys were prepared was that additional, supplemental fiscal data analysis and interviews with staff involved in conveyance system reporting and street sweeping reporting were necessary to develop cost estimates for

conveyance system reporting. The surveys are the outputs from that additional, supplemental data collection that was specifically designed to collect cost estimates in support of the unfunded mandates test claim. Standard unit costs were also used because in my experience the process of reviewing and analyzing conveyance system cleaning data and street sweeping data to provide the reporting metrics required by the 2007 Permit would be expected to be relatively independent of agency size.

c. Reporting on Conveyance System Cleaning

Reimbursement for this category was determined to be best represented with a formula based on a standard unit cost. The formula and components of the formula were determined by reviewing data reported by Municipal Claimants in the County 2011 Co-Permittee Surveys (Vol. 1, pp. 1-376) and the County 2011 County Permittee Survey 2; the specific surveys referenced within the County 2011 Co-Permittee Surveys documentation were those reporting costs for conveyance system inspection and cleaning (Vol. 1, pp. 22-239). Using this information, I have determined that a reasonable standard unit cost for annual conveyance system reporting costs, or *Conveyance Reporting Costs*, is **\$5,784.85<sup>4</sup>**.

The reasonable reimbursement formula is:

$$Reimbursement = \sum_{t=FY\ 07/08}^{FY\ 12/13} [Conveyance\ Reporting\ Cost]_t$$

where, *Conveyance Reporting Costs* refers to the annual reporting cost per permittee to cover the conveyance system cleaning reporting requirements adjusted annually by the CPI. The period of summation for this formula is described in item 12.a above.

The *Conveyance Reporting Cost* standard unit cost represents the median of the permittee’s average annual conveyance system cleaning reported costs between FY 2007/2008 to FY 2009/2010 as reported by the Co-Permittees in submitted County 2011 Co-Permittee Surveys focused on conveyance system cleaning (Vol. 1, pp 22-239; the County 2011 County Permittee Survey 2). These surveys were signed and certified by Municipal Claimant representatives. The unit cost was identified by compiling the average annual costs for reporting on conveyance system cleaning for the Municipal Claimant that submitted this data<sup>5</sup> for FY 2007/2008 through FY2009/10, and then calculating the median value of all the individual Municipal Claimant conveyance system reporting costs. The median was selected as a representative value for a standard unit cost for this unfunded

<sup>4</sup> If the County’s data is excluded from the data set, the standard unit cost would be \$8,431.02.

<sup>5</sup> Data from the following agencies was included: the County of San Diego and the cities of Carlsbad, Chula Vista, El Cajon, Escondido, Imperial Beach, La Mesa, Lemon Grove, Poway, San Marcos, Santee, and Solana Beach.

mandate as it is a more conservative value than that obtained by utilizing the average of costs reported by the subset of Municipal Claimant.

d. Reporting on Street Sweeping

Reimbursement for this category was determined to be best represented with a formula based on a standard unit cost. The formula and components of the formula were determined by reviewing data reported by Municipal Claimants in the County 2011 Co-Permittee Surveys focused on street sweeping (Vol. 1, pp. 240-376). Using this information, I have determined that a reasonable standard unit cost for annual conveyance system reporting costs, or *Sweeping Reporting Cost*, is **\$6,143.67**.

The reasonable reimbursement formula is as follows:

$$\text{Reimbursement} = \sum_{t=\text{FY } 07/08}^{\text{FY } 12/13} [\text{Sweeping Reporting Cost}]_t$$

were, “*Sweeping Reporting Cost*” refers to the annual reporting cost per permittee to cover the street sweeping reporting requirements adjusted annually by the CPI. The period of summation for this formula is described in item 12.a above.

The *Sweeping Reporting Cost* refers to the annual cost per Co-Permittee to cover street sweeping reporting adjusted annually by the CPI. The standard unit cost for *Sweeping Reporting Cost* represents the median of the Municipal Claimants’ average annual reporting costs to cover street sweeping reporting between FY 2007/2008 to FY 2009/2010 as reported by the subset of Municipal Claimants that prepared and submitted County 2011 Co-Permittee Surveys focused on street sweeping<sup>6</sup> (Vol. 1, pp 240-376). The unit cost was identified by compiling the average annual costs for reporting on street sweeping reported by each Municipal Claimant for FY 2007/2008 to FY 2009/2010 and calculating the median value across the subset of Municipal Claimants that submitted street sweeping reporting cost data. The median was selected as a representative value for a standard unit cost for this unfunded mandate as it is a more conservative value than that obtained by utilizing the average of costs reported by the subset of Municipal Claimants.

13. Conveyance System Cleaning (Part D.3.a.(3)(b)(iii)).

The total reimbursement for this category is determined by combining the costs to clean different elements of the conveyance system as described below. Formulae to calculate these costs and details about the period considered for summation of costs and rationale for selection of inputs to these formulae are provided below.

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<sup>6</sup> This includes data from the following agencies: the County of San Diego and the cities of Chula Vista, Coronado, El Cajon, Escondido, Lemon Grove, National City, Oceanside, and San Diego.

a. Period considered for summation of costs for this category

The period of summation for reporting on street sweeping and conveyance system cleaning is from March 24, 2008, which is the date that Co-Permittees were required to begin implementing JURMP developed per the 2007 Permit requirements, to, June 26, 2015, which is the day before Co-Permittees were required to submit and begin implementing JRMPs that reflected requirements of the 2013 Permit. Conveyance system cleaning is part of the JURMP. Provision E of the 2013 Permit requires each permittee to continue implementing its 2007 Permit JURMP until the new JRMP required by the 2013 Permit was implemented. New JRMPs were required to be submitted by June 27, 2015, with implementation of the new JRMPs beginning that same day.

In accordance with the above reimbursement period, the following conservative adjustments are proposed to the conveyance system cleaning for the 2007/2008 and 2012/2013 fiscal years. The 2007/2008 reporting cost claimed should be 27.05% of the standard unit cost. This reflects that 99 days of the 366 days in fiscal year 2007/2008 were on or after March 24, 2008. The 2014/2015 cost claimed should be 98.90% of the standard unit cost. This reflects that 361 of the 365 days in fiscal year 2014/2015 were on or before June 26, 2015.

b. Rationale for selection of cost formula formats used for this category

A standard unit cost approach was used for both conveyance system cleaning because information about these costs were available from a subset of, but not all, Co-Permittees. Further, in my experience preparing and reviewing stormwater fiscal analysis reporting for Co-Permittees and based on my review of the reporting surveys submitted by Co-Permittees (see references later in this section), Co-Permittees' staff time and cost tracking systems do not break out conveyance system cleaning costs into separate, distinct categories (e.g., separating cleaning costs from inspection costs) such that reporting actual costs would be reasonably feasible for these activities. The reason that the cost reporting surveys were prepared was that additional, supplemental fiscal data analysis and interviews with staff involved in conveyance system cleaning was necessary to develop cost estimates for conveyance system cleaning. The surveys are the outputs from that additional, supplemental data collection that was specifically designed to collect cost estimates in support of the unfunded mandates test claim. Standard unit costs were also used because in my experience conveyance system cleaning costs are not expected to vary significantly across Co-Permittees since the methods to clean conveyance system are fairly consistent across agencies. Further, reported unit cost data for similar activities from similar agencies was available for comparison, and the standard unit costs developed for Co-Permittees was comparable to those numbers. This further supports the reasonability of a standard unit cost approach to estimating conveyance system cleaning costs.

c. Conveyance system cleaning cost formula

The formula and components of the formula were determined by reviewing the County 2011 Co-Permittee Surveys focused on conveyance cleaning (Vol. 1, pp. 22-239; the County 2011 County Permittee Survey 2), the Co-Permittee Declarations (Vol. 1, pp. 377-743), and the JURMP Annual Reports submitted by Co-Permittees (Vols. 2-11). Using this information, I have determined that reimbursement for this category is best represented with standard unit costs developed for three types of conveyance system cleaning: cleaning of storm drain inlets or catch basins, cleaning of MS4 pipe, and the cleaning of MS4 open channels. The period of summation for this formula is described in item 13.a above.

*Reimbursement*

$$\begin{aligned}
 &= \sum_{t=FY07/08}^{FY14/15} [(Unit\ Cost)_S(\#S)]_t + \sum_{t=FY07/08}^{FY14/15} [(Unit\ Cost)_P(P)]_t \\
 &+ \sum_{t=FY07/08}^{FY14/15} [(Unit\ Cost)_C(C)]_t
 \end{aligned}$$

where “ $(Unit\ Cost)_S$ ” is the cost to clean one inlet or catch basin adjusted annually by the CPI; “ $(Unit\ Cost)_P$ ” is the cost to clean one linear foot of storm drain pipe adjusted annually by the CPI; “ $(Unit\ Cost)_C$ ” is the cost to clean one linear foot of channel adjusted annually by the CPI; “ $\#S$ ” is the number of storm drain inlets or catch basins cleaned in a year by a Co-Permittee; “ $P$ ” is the distance of storm drain pipe cleaned in linear feet by a Co-Permittee; and “ $C$ ” is the distance of channel cleaned in linear feet by a Co-Permittee. Pipes are underground, enclosed conveyance features while channels are at surface level and are open.

The  $(Unit\ Cost)_S$ ,  $(Unit\ Cost)_P$ , and  $(Unit\ Cost)_C$  are collectively referred to as the “*Unit Costs*” and were developed based on reported costs in the 2011 Co-Permittee Surveys focused on conveyance cleaning (Vol. 1, pp. 22-239) and data included JRMP Annual Reports previously submitted to the Water Board by Co-Permittees (Vols. 2-11). The value of the  $(Unit\ Cost)_S$  represents the median cost to clean one storm drain inlet or catch basin during FY 2007/2008. The value of the  $(Unit\ Cost)_P$  represents the median cost to clean one linear foot of the pipe during FY 2007/2008. The value of the  $(Unit\ Cost)_C$  represents the median cost to clean one linear foot of the channel during FY 2007/2008. The processes and assumptions to determine each of the *Unit Costs* are described below.

- d. Standard unit cost for storm drain inlet or catch basin cleaning,  $(Unit\ Cost)_S$

The  $(Unit\ Cost)_S$  of **\$150.66<sup>7</sup>** represents the median cost to clean one inlet or storm drain basin during FY 2007/2008 as calculated from data compiled from the

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<sup>7</sup> If the County’s data is excluded from the data set, the standard unit cost would be \$124.46.

County 2011 Co-Permittee Surveys focused on MS4 cleaning (Vol. 1, pp. 22-239; the County 2011 County Permittee Survey 2). The data compiled were reported values for storm drain inlet or catch basin cleaning unit costs reported by 16 Co-Permittees<sup>8</sup> within the surveys. The median was selected as the summary statistic to be used as the reasonable standard unit cost for the RRM formula as it was a more conservative estimate than the average.

- e. Standard unit costs for cleaning storm drain pipe,  $(Unit\ Cost)_P$ , and MS4 open channels,  $(Unit\ Cost)_C$

The standard unit costs for cleaning linear MS4 features  $(Unit\ Cost)_P$  of **\$6.77** per linear foot cleaned and  $(Unit\ Cost)_C$  of **\$8.52** per linear foot cleaned were derived from reviewing the stormwater conveyance system cleaning data reported in the Co-Permittee Declarations (Vol. 1, pp. 377-743), in the County 2011 Co-Permittee Surveys focused on conveyance cleaning (Vol. 1, pp. 22-239), and in JURMP Annual reports for FY 2007/2008.<sup>9</sup>

The standard unit cost estimates were calculated by first identifying reasonable estimates of the conveyance system cleaning costs reported by permittees in the Co-Permittee Declarations that were spent on cleaning linear MS4 features. This was determined by subtracting the estimated costs for MS4 structure cleaning for a Co-Permittee in FY07/08 (based on the previously established  $(Unit\ Cost)_S$  and the number of structures reported cleaned in County 2011 Co-Permittee Surveys) from the reported overall MS4 cleaning costs reported in the Co-Permittee Declarations. Once the estimates of costs for linear MS4 feature cleaning in FY07/08 were determined, cost per linear foot of feature cleaned was determined by identifying the length of MS4 pipe and channel cleaned by each Co-Permittee in FY07/08 as reported in JURMP annual reports and dividing the linear MS4 cleaning costs in the table below proportionally for the length of each linear MS4 feature type.

- f. The 2005 State Survey shows that the RRM unit costs are reasonable

To further evaluate reasonableness of the conveyance system unit costs as developed above, the Unit Costs were compared to those found in the 2005 State Survey. The 2005 State Survey was a study prepared by the Office of Water Programs at Sacramento State University for the State Water Resource Control Board. The 2005 State Survey determined that the average cost of catch basin cleaning in the City of Santa Clarita was one hundred and seventy dollars (\$170) per basin, which is similar to but slightly more than the storm drain inlet and catch basin cleaning unit cost of \$150.66 developed above. Additionally, the State Survey found that the average cost of drain line and channel cleaning in the City

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<sup>8</sup> This includes data from the following agencies: the County of San Diego and the cities of Carlsbad, Chula Vista, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, and Vista.

<sup>9</sup> Data from the following agencies was included in the calculation: the cities of Carlsbad, Chula Vista, Escondido, Imperial Beach, and Vista. The JURMP Annual reports can be found in Volumes 2-11.

of Corona was eight dollars and thirty cents per linear foot (\$8.30/ft), which is comparable to the MS4 pipe and channel cleaning costs of \$6.77 and \$8.52, respectively, calculated as described above. While the 2005 State Survey values are not being directly used in the proposed reimbursement calculation approach, the fact that the State Survey values for other Southern California municipalities from a few years before the period used to calculate Co-Permittees' proposed standard unit costs are comparable to the unit costs calculated above based on data from the Co-Permittees in the San Diego region supports that the unit costs are reasonable estimates.

14. Educational Component (Parts D.5.a.(1), D.5.a.(2), D.5.b.(1)(a), D.5.b.(1)(b)(iii.-vi.), D.5.b.(1)(c), D.5.b.(1)(d), D.5.b.(2), D.5.b.(3)).

The total reimbursable for education is determined by combining the regional outreach shared costs and jurisdictional educational programs as described in detail below.

- a. Regional Outreach Shared Costs – Residential Education Program Development and Implementation
  - i. Period considered for summation of costs for this category

The period of summation for Residential Education Program Development and Implementation is from January 24, 2007, which is the effective date of the 2007 Permit, to June 26, 2013, which is the day before the effective date of the 2013 Permit. Development of the Regional Outreach Residential Education Program was undertaken prior to the implementation date of the 2007 Permit so Co-Permittees could meet the requirements of implementing said program as soon as the date of delayed Permit implementation (March 24, 2008). Regional Education Program Implementation requirements outlined in the 2007 Permit ended once the new 2013 Permit became effective.

In accordance with the above reimbursement period, the following conservative adjustments are proposed to the Residential Education Program Development and Implementation costs for the 2006/2007 and 2012/2013 years. The 2006/2007 Residential Education Program Development and Implementation cost claimed should be reduced to 43.29% of the cost. This reflects that 158 of the 365 days in fiscal year 2006/2007 were on or after January 24, 2007. The 2012/2013 costs claimed should be 98.90% of the costs. This reflects that 361 of the 365 days in fiscal year 2012/2013 were on or before June 26, 2013.

- ii. Rationale for selection of cost formula formats used for this category

The formula and components of the formula were determined by reviewing the Co-Permittee Declarations (Vol. 1, pp. 377-743), Cost-Sharing Memorandums of Understanding (“MOUs”) (Vol. 13, pp. 10,785-

10,907), and the Regional Cost Sharing Documentation (Vol. 13, pp. 10908-10916). Using this information, I determined that a reasonable reimbursement formula based on reported actual costs should be used because costs for this category were at first incurred by a lead Co-Permittee (in this case the County of San Diego) and the distribution of responsibility for costs between all Co-Permittees was determined by established MOUs.

iii. Residential Education Program Development cost formula

The reasonable reimbursement formula for the costs of Residential Education Program Development and Implementation is:

$$Reimbursement = \sum_{t=FY06/07}^{FY12/13} [(County\ Education\ Costs)(MOU)]_t$$

where “*County Education Costs*” are the annual shared costs for developing and implementing the Residential Education Program, and “*MOU*” is the Co-Permittees’ proportional share of the cost.

iv. Calculation of reported actual costs for Residential Education Program Development and Implementation

The yearly *County Education Costs* that were the responsibility of each Co-Permittee per the MOU distribution were reported in the Co-Permittee Declarations (Vol. 1, pp. 377-743) for FY2007/2008 to FY 2011/2012; only 18 Co-Permittees are represented in this data due to the declaration appendix documentation being unavailable for the City of Santee. For FY 2012/2013, the *County Education Costs* were determined by reviewing Regional Cost Sharing Documentation (Vol. 13, pp. 10,917-13,074). The data from both sources were summarized by year to calculate total annual Regional Education Program Development and Implementation Cost incurred by the Co-Permittees throughout the reimbursement time period are presented in the table below. A description of how the fiscal responsibility of each Co-Permittee was determined during this time period is outlined in the MOUs included in submitted documentation (Vol. 13. Pp. 10.785-10,907).

<b>Fiscal Year</b>	<b>County Education Cost</b>	<b>Location of Data</b>
FY 2006/2007	-	N/A
FY 2007/2008	\$219,226.90	Co-Permittee Declarations (Vol. 1, pp. 377-743)
FY 2008/2009	\$438,452.75	
FY 2009/2010	\$876,907.50	
FY 2010/2011	\$920,752.90	
FY 2011/2012	\$966,791.36	



FY 2012/2013	\$138,040.00	Regional Cost Sharing Documentation (Vol. 13, p. 12,830)
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b. Jurisdictional Educational Programs

i. Period considered for summation of costs for this category

The period of summation for jurisdictional educational programs is from March 24, 2008, which is the date that permittees were required to begin implementing their JURMP developed per the 2007 Permit requirements to June 26, 2015, which is the day before Co-Permittees were required to submit and begin implementing JRMPs that reflected requirements of the 2013 Permit. Jurisdictional educational program implementation is part of the JURMP requirements outlined in the 2007 Permit and Provision E of the 2013 Permit requires each Co-Permittee to continue implementing their 2007 JURMP until the new JRMP was implemented. New JRMPs were required to be submitted by June 27, 2015, with implementation of the new JRMPs beginning that same day.

In accordance with the above reimbursement period, the following conservative adjustments are proposed to the street sweeping and reporting costs for the 2007/2008 and 2012/2013 fiscal years. The 2007/2008 cost claimed should be 27.05% of the standard unit cost. This reflects that 99 days of the 366 days in fiscal year 2007/2008 were on or after March 24, 2008. The 2014/2015 cost claimed should be 98.90% of the standard unit cost. This reflects that 361 of the 365 days in fiscal year 2014/2015 were on or before June 26, 2015.

ii. Rationale for selection of cost formula format used for this category

The formula and components of the formula were determined by reviewing the JURMP Annual Reports (Vols. 2-11), WURMP Annual Reports (Vol. 13, pp. 1-10756), D-Max Files (Vol. 14, pp. 8-189), and County Fiscal Analysis Documents (Vol. 13, pp. 10757-10784). Using this information I have determined that a reasonable reimbursement formula based on a standard percentage of Co-Permittee stormwater expenditures is appropriate. A standard percentage was used because data to calculate the percentage of total stormwater expenditures that were budgeted for implementing jurisdictional educational program within each year were available from a subset of, but not all Co-Permittees. It is expected that the actual costs for implementation of jurisdictional educational programs would vary significantly between Co-Permittees based on factors such as jurisdiction size, population, etc. Generally, larger agencies with greater stormwater program expenditures have larger education expenditures. The use of a standard percentage allows for variability in the quantity Co-

Permittees can claim directly in line with the amount that they reasonably would have spent based on the jurisdiction’s overall stormwater expenditures; this variability would not be appropriately incorporated if the formula were to be based on a standard unit cost.

iii. Jurisdictional education program cost formula

The reasonable reimbursement formula for the costs of Jurisdictional Education Programs are as follows:

$$Reimbursement = \sum_{t=FY07/08}^{FY14/15} [(Education\ Costs)(Total)]_t$$

where “*Education Costs*” is the standard percentage of the total stormwater budget reported that is spent on jurisdiction education programs; and “*Total*” is a Co-Permittee’s total stormwater expenditures in a particular year. The value of *Education Costs* represents the average percentage of total stormwater expenditures reported by a subset of Co-Permittees as education costs and is two and sixteen hundredths percent (**2.16%**).<sup>10</sup>

iv. Standard percentage for jurisdictional education program costs

The value of *Education Costs* was determined by compiling a dataset of the total stormwater expenditures as reported in JURMP Annual Reports (Vols. 2-11) and the jurisdictional education program expenditures as reported in JURMP Annual Reports (Vols. 2-11), WURMP Annual Reports (vol. 13 pp. 1-10,756), or D-Max Files (Vol. 14, pp. 8-189) to then calculate the percentage of each years reported total stormwater expenditures each Co-Permittee spent on jurisdictional educational costs. All 19 Co-Permittee were represented at least once in the dataset, but not all Co-Permittee had jurisdictional education costs available for all years considered. This is a representative sample of Co-Permittee expenditures data.

15. Watershed Activities and Collaboration in the WURMP (Part E.2.f & E.2.g).

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<sup>10</sup> The calculation to identify this standard percentage included costs in FY06/07 and the entirety of FY 07/08. It is my understanding that the costs in these years include costs to develop education programs and begin educational activities required by the 2007 Permit before they were formally required to be implemented. As the 2007 Permit did not require Co-Permittees to incur Education Costs until March 24, 2008, it is my understanding that this FY06/07 and some of FY07/08 are not actual costs spent during the term of this Permit. With that established, these values are useful in determining a general standard percentage spent on Education Costs. If these values are removed the standard percent estimate would increase slightly to 2.17%. As a conservative estimate for the purpose of the RRM the estimate has been left as originally calculated.

The total reimbursement for this element is determined by combining cost share contributions, jurisdictional watershed activities, regional WURMP costs and meeting cost as described in detail below.

a. Watershed Workgroup Cost Share Contributions

i. Period considered for summation of costs for this category

The period of summation for watershed workgroup cost share contributions is from January 24, 2007, or the effective date of the 2007 Permit, to June 26, 2013, which is the day before the effective date of the 2013 Permit. The watershed workgroups are an element of Co-Permittee collaboration that required significant planning and development work that took place before Co-Permittees were required to begin implementing WURMPs that were developed per the 2007 Permit requirements. After WURMP implementation began, meetings to coordinate implementation of and reporting on the WURMPs continued throughout the period the 2007 Permit was in effect. The requirements for watershed workgroup collaboration related to the WURMP did not carry over in the same capacity following the effective date of the 2013 Permit (June 27, 2013). After the effective date of the 2013 Permit, watershed groups meetings were primarily focused on work to develop and implement Water Quality Improvement Plans required under the 2013 Permit.

In accordance with the above reimbursement period, the following conservative adjustments are proposed to the watershed workgroup cost share costs for the 2006/2007 and 2012/2013 years. The 2006/2007 cost claimed should be reduced to 43.29% of the cost. This reflects that 158 of the 365 days in fiscal year 2006/2007 were on or after January 24, 2007. The 2012/2013 costs claimed should be 98.90% of the costs. This reflects that 361 of the 365 days in fiscal year 2012/2013 were on or before June 26, 2013.

ii. Rationale for selection of cost formula formats used for this category

The formula and components of the formula were determined by reviewing the County Watershed Workgroup Expenditure Records (Vol. 13, pp 10908-10916) and the Cost-Sharing MOUs (Vol. 13, pp. 10,785-10,907). Using this information, I have determined that a reasonable reimbursement formula based on reported costs should be used because the costs for this category were first incurred by a lead Co-Permittee, and the other Co-Permittees in each watershed workgroup then were responsible for a defined proportion of the costs to be paid to the lead Co-Permittee. The distribution of responsibility for costs among all Co-Permittees in each watershed that had shared costs was determined by established MOUs, cost share agreements, or similar agreements.

iii. Watershed Workgroup Cost Share Contribution cost formula

The reasonable reimbursement formula for the costs of Watershed Workgroup Cost Share Contributions is:

$$\text{Reimbursement} = \sum_{t=\text{FY06/07}}^{\text{FY12/13}} [(\text{Watershed Lead Costs})(\text{MOUs})]_t$$

where “*Watershed Lead Costs*” are the actual annual shared costs for the Watershed Workgroup, and “*MOU*” is the Co-Permittees’ proportional share of the cost. Calculation of reported actual costs for Watershed Workgroup Cost Share Contributions

The yearly *Watershed Lead Costs* that for the Watershed Workgroup lead Co-Permittee were determined by reviewing the watershed cost-share contributions paid by the County of San Diego included in the County Watershed Workgroup Expenditure Records (Vol. 13, p 10908) and dividing the reported County costs by the percent of watershed costs that the County was responsible for in a given year to find the total watershed lead costs. The County’s % Cost responsibility was determined per the process outlined in the MOUs (Vol. 13, pp 10785-10907). Based on review of the documentation I have determined the yearly *Watershed Lead Costs* are:

<b>Watershed</b>	<b>Fiscal Year</b>	<b>County Reported Costs<sup>1,2</sup></b>	<b>County % Cost Responsibility per MOU</b>	<b>Watershed Lead Costs</b>
Carlsbad	FY06-07	\$6,988.00	21.83%	\$32,010.99
	FY07-08	\$5,335.00	21.83%	\$24,438.85
	FY08-09	\$5,398.00	21.83%	\$24,727.44
	FY09-10	\$5,668.00	21.83%	\$25,964.27
	FY10-11	\$6,249.00	21.83%	\$28,625.74
	FY11-12	\$6,561.00	21.83%	\$30,054.97
	FY12-13	\$5,032.47	21.83%	\$23,053.00
Los Peñasquitos	FY06-07 <sup>2</sup>	-	-	-
	FY07-08	\$64.09	2.67%	\$2,400.37
	FY08-09	\$648.57	2.67%	\$24,291.01
	FY09-10	\$633.84	2.67%	\$23,739.33
	FY10-11	\$702.06	2.67%	\$26,294.38
	FY11-12	\$710.59	2.79%	\$25,469.18
	FY12-13	\$683.67	2.79%	\$24,504.30
San Diego Bay	FY06-07 <sup>2</sup>	-	-	-
	FY07-08 <sup>2</sup>	-	-	-
	FY08-09 <sup>2</sup>	-	-	-
	FY09-10 <sup>2</sup>	-	-	-
	FY10-11 <sup>2</sup>	-	-	-
	FY11-12	\$3,820.00	25.59%	\$14,927.71
	FY10-11	\$3,820.00	26.15%	\$14,608.03
FY12-13	\$3,820.00	25.59%	\$14,927.71	

Watershed	Fiscal Year	County Reported Costs <sup>1,2</sup>	County % Cost Responsibility per MOU	Watershed Lead Costs
San Diego River	FY06-07	-	-	-
	FY07-08	\$7,062.00	35.47%	\$19,909.78
	FY08-09	\$10,511.00	35.47%	\$29,633.49
	FY09-10	\$10,511.00	35.47%	\$29,633.49
	FY10-11	\$10,511.00	35.47%	\$29,633.49
	FY11-12	\$10,511.00	32.77%	\$32,075.07
	FY12-13	\$4,927.00	32.77%	\$15,035.09
San Dieguito	FY06-07 <sup>2</sup>	-	-	-
	FY07-08	\$834.30	48.41%	\$1,723.40
	FY08-09	\$5,479.12	48.41%	\$11,318.16
	FY09-10	\$8,616.78	48.41%	\$17,799.59
	FY09-10	\$1,716.93	48.41%	\$3,546.64
	FY10-11	\$11,458.10	48.41%	\$23,668.87
	FY11-12	\$9,019.32	49.76%	\$18,125.64
	FY12-13	\$12,030.08	49.76%	\$24,176.21

Notes:

<sup>1</sup> Data location within submitted documentation is at Vol. 13, p 10,908.

<sup>2</sup> Overall watershed workgroup cost data was not identified for this fiscal year in documents reviewed (i.e., the documents provided all Volumes). Similarly, watershed workgroup costs were not identified for several watersheds in any year (Santa Margarita, San Luis Rey, Mission Bay, and Tijuana River). Should Co-Permittees identify additional costs for these years or watersheds, it would also be appropriate to claim reimbursement for those expenses, provided that they provide appropriate supporting documentation when submitting their claims.

b. Jurisdiction Watershed Activities

i. Period considered for summation of costs for this category

The period of summation for jurisdiction watershed activities is from March 24, 2008, which is the date that permittees were required to begin implementing their JURMP developed per the 2007 Permit requirements, to June 26, 2013, which is the day before the effective date of the 2013 Permit. Jurisdiction Watershed Activities are elements of the Watershed Urban Runoff Management Program (WURMP) requirements outlined in the 2007 Permit. The 2013 Permit did not include a provision requiring Co-Permittees to continue implementing WURMP requirements while Water Quality Improvement Plan (WQIPs) were in development, which is why the period for Jurisdiction Watershed activities ends when the 2013 Permit went into effect.

In accordance with the above reimbursement period, the following conservative adjustments are proposed to the jurisdiction watershed activities costs for the 2007/2008 and 2012/2013 years. The 2007/2008 cost claimed should be 27.05% of the standard unit cost. This reflects that 99 days of the 366 days in fiscal year 2007/2008 were on or after March 24, 2008. The 2012/2013 costs claimed should be 98.90% of the costs.

This reflects that 361 of the 365 days in fiscal year 2012/2013 were on or before June 26, 2013.

ii. Rationale for selection of cost formula format used for this category

The formula and components of the formula were determined by reviewing the Co-Permittee Declarations (Vol. 1, pp. 377-743). Using this information, I have determined that reimbursement for this category is best represented with a formula based on a standard unit cost because information about these costs were available from a subset of, but not all Co-Permittees. Further, based on my experience preparing and reviewing stormwater program fiscal analysis reporting on behalf of Co-Permittees and based on review of reported costs in Co-Permittee Declarations (Vol. 1, pp. 377-743), Co-Permittees' staff time and cost tracking systems do not break out stormwater program implementation costs into separate, distinct categories by individual watershed activity. Part of the reason that the Co-Permittee Declarations were developed was that additional, supplemental fiscal data analysis and interviews with staff intimately familiar with Co-Permittee stormwater program activities were necessary to determine estimates for costs of implementing jurisdiction watershed activities. A standard unit cost based on a median value (see additional discussion below) is also appropriate, in comparison to an average, because it removes the effect of a few agencies that did exceptionally expensive watershed activities and therefore is, in my experience, more representative of a typical level of effort across Co-Permittees of various sizes.

iii. Jurisdiction Watershed Activities cost formula

Following consideration of the Board's comments I have reevaluated the reasonable reimbursement formula for jurisdiction watershed activities and have developed an updated unit cost and formula that better reflects the implementation of jurisdiction watershed activities during the period described above.

The reasonable reimbursement formula presented in my original declaration is as follows:

$$Reimbursement = \sum_{t=FY07/08}^{FY12/13} [4 * Jurisdictional Activities]_t$$

where "*Jurisdictional Activities*" is the cost to perform one jurisdictional activity per permittee adjusted annually for the CPI. This formula incorrectly did not account for the number of watersheds in which a Co-Permittee would be required to implement jurisdiction watershed activities, and thus would underestimate the costs for Co-Permittees, such

as the County of San Diego that span eight (8) watersheds management areas.

The updated reasonable reimbursement formula is as follows:

$$Reimbursement = \sum_{t=FY07/08}^{FY12/13} [4 * Watersheds * Jurisdictional Activities]_t$$

where “*Jurisdictional Activities*” is the cost to perform one jurisdictional activity per permittee adjusted annually for the CPI and “*Watersheds*” is the number of watersheds in which a Co-Permittee is located. For the purposed of the RRM, it is assumed that each Co-Permittee performed the minimum number of watershed activities required under the 2007 Permit in each watershed.

iv. Standard unit cost for Jurisdiction Watershed Activities

Following consideration of the San Diego Water Board’s comments, I have reevaluated the calculation of a standard unit cost per jurisdiction watershed activity. The previous standard unit cost per jurisdiction watershed activity was \$8,125.00. The reevaluated standard unit cost that should be used for RRM is **\$2,500**. The revised calculation divides the total watershed activity cost by 4 times the number of WURMPs the agency is included in, rather than just dividing by 4. This more accurately represents the level of effort per activity since Co-Permittees in multiple watersheds implemented activities specific to each watershed.

The value of the *Jurisdictional Activities* represents the median cost to perform one jurisdictional activity in FY07/08 based on implementation costs reported in Co-Permittee Declarations (Vol. 1, pp. 377-743). The unit cost for *Jurisdictional Activities* was determined by identifying the median cost per activity spent. The median was selected because it was a more conservative estimate of a reasonable unit cost given the range of jurisdictional activities costs reported by the Co-Permittees.<sup>11</sup> The median was determined by calculating the estimated per watershed activity cost based on the total cost for watershed activities included in the Co-Permittee Declarations and the number of watersheds in which each Co-Permittee is located, with the assumption that each jurisdiction completed the minimum four (4) watershed activities, and then calculating the median of these per activity costs.

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<sup>11</sup> Data from the following agencies was included in the calculation to determine the unit cost: the County of San Diego and the cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, National City, Oceanside, San Diego, San Marcos, Solana Beach, and Vista. Note that the cities of Poway and Santee submitted expected costs. Those data were not included in the calculation of the standard unit cost. However, also note that because Santee’s expected cost was below the median and Poway’s was above the median, including their data and then recalculating the median still results in the same overall median value of \$2,500.

c. Regional Watershed Activities – WURMP

i. Period considered for summation of costs for this category

The period of summation for Regional Watershed Activities is from March 24, 2008, which is the date that permittees were required to begin implementing their JURMP developed per the 2007 Permit requirements, to June 26, 2013, which is the day before the effective date of the 2013 Permit. Regional Watershed Activities are elements of the WURMP requirements outlined in the 2007 Permit. The 2013 Permit did not include a provision requiring Co-Permittees to continue implementing WURMP requirements while WQIPs were in development, which is why the period for Regional Watershed Activities ends when the 2013 Permit went into effect.

ii. Rationale for selection of cost formula format used for this category

The formula and components of the formula were determined by reviewing the Regional Cost Sharing Documentation (Vol. 13, pp. 10917-13074), which identified regional WURMP costs as being shared among Co-Permittees per an agreed upon MOU or similar cost sharing agreement.

iii. Regional Watershed Activities – WURMP cost formula

The reasonable reimbursement formula for Regional Watershed Activities – WURMP is as follows:

$$Reimbursement = \sum_{t=FY07/08}^{FY12/13} [(WURMP Costs)(MOU)]_t$$

where “WURMP Costs” are the actual annual costs for the Regional WURMP Working Group to develop and maintain the Regional Watershed Activities Database, and “MOU” is the Co-Permittees’ proportional share of the cost based on the MOUs.

The yearly WURMP Costs are:

<b>Fiscal Year</b>	<b>WURMP Costs</b>	<b>Location of Data</b>
FY 2008/2009	\$2,737.91	Vol. 13, p 10982
FY 2009/2010	\$3,287.23	Vol. 13, pp. 11630-11650

d. Watershed Workgroup Meetings



i. Period considered for summation of costs for this category

The period of summation for watershed workgroup meetings contributions is from January 24, 2007, or the effective date of the 2007 Permit, to June 26, 2013, which is the day before the effective date of the 2013 Permit. The watershed workgroups are an element of Co-Permittee collaboration that required significant planning and development work that took place before Co-Permittees were required to begin implementing WURMPs that were developed per the 2007 Permit requirements. After WURMP implementation began, meetings to coordinate implementation of and reporting on the WURMPs continued throughout the period the 2007 Permit was in effect. The requirements for watershed workgroup collaboration related to the WURMP did not carry over in the same capacity following the effective date of the 2013 Permit (June 27, 2013). After the effective date of the 2013 Permit, watershed groups meetings were primarily focused on work to develop and implement Water Quality Improvement Plans required under the 2013 Permit.

In accordance with the above reimbursement period, the following conservative adjustments are proposed to the watershed workgroup meetings costs for the 2006/2007 and 2012/2013 years. The 2006/2007 cost claimed should be reduced to 43.29% of the cost. This reflects that 158 of the 365 days in fiscal year 2006/2007 were on or after January 24, 2007. The 2012/2013 costs claimed should be 98.90% of the costs. This reflects that 361 of the 365 days in fiscal year 2012/2013 were on or before June 26, 2013.

ii. Rationale for selection of cost formula format used for this category

The formula and components follow a format first developed in the Co-Permittee Declarations (Vol. 1, pp. 377-743) and County 2011 Co-Permittee Surveys focused on mandated meetings (Vol. 1, pp. 1-21), which applies an hourly rate for staff attending a meeting to a standard meeting duration. The meeting duration includes the meeting plus preparation and travel time. A standard unit cost based on the meeting duration and an average hourly rate was determined to be a reasonably representative approach. The average hourly rate was selected as a reasonably representative value because in my experience different levels of staff (senior versus junior, engineer versus planner, etc.) attended different meeting types over the years, depending on meeting content, staff availability, staff promotions and new hires, and other similar factors, so an average is reasonably representative of the range of staff who were likely to attend these meetings for a given Co-Permittee over the claim period.

iii. Watershed workgroup meetings cost formula

The formula and components of the formula were determined by reviewing the Co-Permittee Declarations (Vol. 1, pp. 377-743), County 2011 Co-Permittee Surveys focused on mandated meetings (Vol. 1, pp. 1-21). Using this information, I have determined that a formula based on a standard unit cost would be most appropriate for this category. The reasonable reimbursement formula for Watershed Workgroup Meetings is as follows:

$$Reimbursement = \sum_{t=FY06/07}^{FY12/13} [(Rate)(\# Attendees)(\# Meetings)]_t$$

where “*Rate*” is the cost of a Co-Permittee employee to attend one regional workgroup meeting; “*# Attendees*” is the number of representatives for each Co-Permittee that attended the watershed workgroup meeting; and “*# Meetings*” is the number of Watershed Workgroup meetings attended by a Co-Permittee.

iv. Watershed workgroup meetings standard unit cost

The value of *Rate* was determined to be two hundred and sixty-two dollars and eighty-eight cents (\$262.88). The *Rate* represents the average cost for a Co-Permittee employee to attend a meeting in FY07/08 and is based on the average of hourly rate data for Municipal Claimant employees who attend meetings reported in the Co-Permittee Declarations<sup>12</sup> (Vol. 1, pp. 377-743) and the typical duration (meeting plus travel time and preparation) of three hours reflected in the declarations. The average and median are approximately the same, but the average was used because it is a slightly more conservative estimate than the median value.

The data set is representative because it includes most Co-Permittees, and the salaries reported by Co-Permittees are reasonably representative as there was a range of seniority and specializations included in the set of positions listed. The *Rate* is adjusted annually for CPI for use in the summation formula.

16. Regional Urban Runoff Management Program, “RURMP” (Parts F.1., F.2. & F.3).

- a. Period considered for summation of costs for this category
- b. The period of summation for RURMP cost share contributions is from January 24, 2007, or the effective date of the 2007 Permit, to June 26, 2013, which is the day before the effective date of the 2013 Permit. RURMP planning began after

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<sup>12</sup> Data from the following agencies was used in the calculation: the County of San Diego and the cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, and Vista.

the 2007 Permit was adopted and continued until the effective date of the 2013 Permit because the 2013 Permit did not require a RURMP or RURMP activities.

c. Rationale for selection of cost formula format used for this category

RURMP costs were shared among Co-Permittees per an agreed upon MOU or similar cost sharing agreement and were documented in workgroup and cost sharing records as described in more detail below. This information can be used to identify the cost share of each Co-Permittee.

d. RURMP cost formula and components

The formula and components of the formula were determined by reviewing the County Watershed Workgroup Expenditure Records (Vol. 13, pp. 10908-10916) and Regional Cost Sharing Documentation (Vol. 13, pp. 10,917-13,074). Using this information, I have determined that a reasonable reimbursement formula based on actual costs is most appropriate for this category. The reasonable reimbursement formula for the costs of the RURMP is as follows:

$$Reimbursement = \sum_{t=FY06/07}^{FY12/13} [(Cost\ Share)(MOU)]_t$$

where “*Cost Share*” is the annual cost share values invoiced by the County, and “*MOU*” is the Co-Permittee’s proportional share of the cost based on the MOUs. Actual costs were identified for only some years within the appropriate reimbursement time frame identified in item 16.a above.

RURMP costs are Regional Workgroup Expenditures specifically designated as allocated for RURMP annual reporting. These expenditures were reported by the following workgroups: Fiscal, Reporting, and Assessment (FRA); Industrial and Commercial Sources (ICS), Monitoring (MON), Municipal (Muni), Watershed Urban Runoff Management Program (WURMP), Education and Regional Sources (ERS), and Land Development (LD). The RURMP expenditures reported by these workgroups were removed from the workgroup expenditures presented for some of these workgroups in other categories (e.g., FRA expenses in item 17.b) to avoid double counting. Expenditures data can be found in the County Watershed Workgroup Expenditure Records (Vol. 13, pp 10908-10916) and the Regional Cost Sharing Documentation (Vol. 13, pp. 10917-13074). The yearly Regional Workgroup RURMP Costs are:

<b>Fiscal Year</b>	<b>Cost Share</b>
FY 2008/2009	\$2,928.91
FY 2009/2010	\$5,230.98
FY 2010/2011	\$1,926.50

## 17. Program Effectiveness Assessment (Parts I.1 & I.2).

The total reimbursable for program effectiveness assessment is determined by combining the jurisdictional program effectiveness assessment and Regional Fiscal, Reporting, and Assessment (“FRA”) Workgroup expenditures as described in detail below.

### a. Jurisdictional Program Effectiveness Assessment

#### i. Period considered for summation of costs for this category

The period of summation for jurisdiction program effectiveness assessment is from March 24, 2008, which is the date that permittees were required to begin implementing their JURMP developed per the 2007 Permit requirements, to June 26, 2013, which is the day before the effective date of the 2013 Permit. The rationale for ending this period at the effective date of the 2013 Permit is the same as that described for street sweeping and catch basin cleaning reported in item 12 above.

In accordance with the above reimbursement period, the following conservative adjustments are proposed to the program effectiveness assessment costs for the 2007/2008 and 2012/2013 years. The 2007/2008 cost claimed should be 27.05% of the standard unit cost. This reflects that 99 days of the 366 days in fiscal year 2007/2008 were on or after March 24, 2008. The 2012/2013 costs claimed should be 98.90% of the reported costs. This reflects that 361 of the 365 days in fiscal year 2012/2013 were on or before June 26, 2013.

#### ii. Rationale for selection of cost formula format used for this category

The formula and components of the formula were determined by reviewing the JURMP Annual Reports (Vols 2-11) and D-Max Files (Vol. 14, pp. 8-189), as described in more detail below. Using this information I have determined that a reasonable reimbursement formula based on a standard percentage of Co-Permittee stormwater expenditures is appropriate. A standard percentage was used because data to calculate the percentage of total stormwater expenditures that were budgeted for implementing jurisdictional program effectiveness assessments within each year were available from a subset of, but not all Co-Permittees. It is expected that the actual costs for implementation of jurisdictional program effectiveness assessments would vary significantly between Co-Permittees based on factors such as jurisdiction size, number of people and departments involved in implementing the stormwater program, etc. In my experience these costs generally increase as the size and cost of the stormwater program increases. The use of a standard percentage allows for variability in the quantity Co-Permittees can claim directly in line with the amount that they reasonably would have spent based on the jurisdiction’s overall stormwater expenditures; this variability would not be

appropriately incorporated if the formula were to be based on a standard unit cost.

iii. Jurisdictional Program Effectiveness Assessment cost formula

The formula and components of the formula were determined by reviewing the Co-Permittees' JURMP Annual Reports (Volumes 2-11) and the D-Max Files (Vol. 14, pp 8-189). Using this information, I have determined that a reasonable reimbursement formula based on a standard percentage is most appropriate. The reimbursement formula for the costs of jurisdictional program effectiveness assessment is as follows:

$$Reimbursement = \sum_{t=FY07/08}^{FY12/13} [(Effectiveness)(Total)]_t$$

where "*Effectiveness*" is the standard percentage of the total stormwater expenditures spent by Co-Permittees on jurisdictional program effectiveness assessment, and "*Total*" is the Co-Permittees' annual total stormwater expenditures as reported in JURMP annual reports.

iv. Standard percentage for Jurisdictional Program Effectiveness Assessment costs

The standard percentage of Co-Permittees' total stormwater budget reasonably estimated to be spent on jurisdictional program effectiveness assessment is **3.72<sup>13</sup>%**. The standard percentage of total stormwater budget spent by Co-Permittees on assessing jurisdictional program effectiveness was determined by evaluating the actual costs charged to several Co-Permittees for work completed by D-Max to fulfill the program effectiveness assessment requirements (Vol. 14, pp 8-189) and costs for program effectiveness assessment implementation reported by Co-Permittees in JURMP annual reports where available (Vols. 2-11).<sup>14</sup>

I believe that it is reasonable to expect that other Co-Permittees spent a similar amount of effort and funds on evaluating jurisdiction program effectiveness proportional to their program size; thus, this standard

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<sup>13</sup> The calculation to identify this standard percentage included a value reported by the City of San Diego for FY06/07 which is lower than the percentage reported by the City in subsequent years. As the 2007 Permit did not require Co-Permittees to implement Program Effectiveness until March 24, 2008, it is my understanding that this FY06/07 value represents costs for the City to develop how they would implement program effectiveness assessment once the Permit became effective and as such does not represent the full costs of ongoing/routine program effectiveness assessment. If this value is removed the standard percent estimate would increase slightly to 3.76%. As a conservative estimate for the purpose of the RRM the estimate has been left as originally calculated.

<sup>14</sup> Data from the following agencies was used in the calculation of the standard percentage: the cities of La Mesa, National City, Poway, San Diego, and Santee.

percentage of total annual stormwater expenditures is appropriate for the RRM.

b. Regional Fiscal, Reporting, and Assessment (“FRA”) Workgroup Expenditures

i. Period considered for summation of costs for this category

The period of summation for FRA workgroup expenditures is from January 24, 2007, or the effective date of the 2007 Permit, to June 26, 2013, which is the day before the effective date of the 2013 Permit. FRA activities including developing standard assessment practices and methods for reporting them; this planning activity began after the 2007 Permit was adopted. The FRA workgroup continued to support Co-Permittees in their effectiveness assessment work throughout the duration of the 2007 Permit. After the 2013 Permit went into effect, program effectiveness reporting was no longer necessary for the same reason as described under item 17.a above, so FRA workgroup costs are not claimed after that date.

ii. Rationale for selection of cost formula format used for this category

FRA costs were shared among Co-Permittees per an agreed upon MOU or similar cost sharing agreement and were documented in workgroup and cost sharing records as described in more detail below. This information can be used to identify the cost share of each Co-Permittee.

iii. FRA Workgroup Expenditure cost formula and components

The formula and components of the formula were determined by reviewing the County Watershed Workgroup Expenditure Records (Vol. 13, pp. 10908-10916) and Cost-Sharing MOUs (Vol. 13, pp 10785-10907). Using this information, I have determined that a reasonable reimbursement formula based on actual costs was most appropriate as there is an already known distribution of funds between the Co-Permittees (MOUs) to allow for later individual claims to be submitted.

The reasonable reimbursement formula for the costs of the Regional FRA Workgroup Expenditures is:

$$Reimbursement = \sum_{t=FY06/07}^{FY12/13} [(FRA\ Workgroup\ Costs)(MOU)]_t$$

where “*FRA Workgroup Costs*” are the shared costs for developing and implementing the Regional FRA Workgroup Expenditures, and “*MOU*” is the Co-Permittees’s proportional share of the cost based on the MOUs. The yearly *FRA Workgroup Costs* do not include costs reported by the FRA Workgroup to be associated with RURMP review and are as follows:

<b>Fiscal Year</b>	<b>FRA Workgroup Costs</b>	<b>Location of Data</b>
FY 2008/2009	\$24,466.92	Vol. 13, p. 11011
FY 2009/2010	\$32,423.11	Vol. 13, pp. 11605-11608
FY 2010/2011	\$72,983.57	Vol. 13, pp. 11665-11666

Note: The Co-Permittees' proportional shares of costs for the Long-Term Effectiveness Assessment and other Regional Workgroup costs are outlined in the MOUs included at Volume 13, pages 10,785 to 10,907.

Although reimbursement would be proper throughout the period defined above as this is when the 2007 Permit required this activity, there were only actual costs reported for a portion of this time.

#### 18. Long-Term Effectiveness Assessment (Part I.5).

##### a. Period considered for summation of costs for this category

The period of summation for Long-Term Effectiveness Assessment shared costs is from January 24, 2007, or the effective date of the 2007 Permit, to June 26, 2013, which is the day before the effective date of the 2013 Permit. The Long-Term Effectiveness Assessment was a work product prepared per the requirements of the 2007 Permit and submitted to the San Diego Water Board in June 2011. Practically speaking, the costs to develop the Long-Term Effectiveness Assessment were primarily incurred around and leading up to that time, as described in further detail below.

##### b. Rationale for selection of cost formula format used for this category

Long-Term Effectiveness Assessment costs were shared among Co-Permittees per an agreed upon MOU or similar cost sharing agreement and were documented in workgroup and cost sharing records as described in more detail below. This information can be used to identify the cost share of each Co-Permittee.

##### c. Long-Term Effectiveness Assessment cost formula and components

The formula and components of the formula were determined by reviewing the Regional Cost Sharing Documentation (Vol. 13, pp. 10917-13074) and Cost-Sharing MOUs (Vol. 13, pp. 10785-10907). Using this information, I have determined that reasonable reimbursement formula based on actual costs was most appropriate as there is an already known distribution of funds between Co-Permittees (MOUs) to allow for later individual claims to be submitted.

The reasonable reimbursement formula for the costs of the long-term effectiveness assessment is as follows:

$$Reimbursement = \sum_{t=FY07/08}^{FY12/13} [(Contractor Costs)(MOU)]_t$$

where “*Contractor Costs*” are actual costs of the contractors needed to assess the long-term effectiveness of the projects as reported by the County, and “*MOU*” is the Co-Permittees’ proportional share of the cost based on the MOUs. The reported annual *Contractor Costs* are:

<b>Fiscal Year</b>	<b>Contractor Costs</b>	<b>Location of Data</b>
FY 2010/2011 (FRA Workgroup Costs)	\$132,212.21	Vol. 13, p 11,665
FY 2010/2011 (Monitoring Workgroup Costs)	\$212,327.00	Vol. 13, p 11,719
<b>Total Contractor Costs</b>	<b>\$344,539.21</b>	

Note: The Co-Permittees’ proportional shares of costs for the Long-Term Effectiveness Assessment and other Regional Workgroup costs are outlined in the MOUs included at Volume 13, pages 10,785 to 10,907.

Although reimbursement would be proper throughout the period defined above as this is when the 2007 Permit required this activity, there were only actual costs reported for a portion of this time.

19. All Permittee Collaboration (Part L.1.a.(3)-(6)).

The reimbursement for all permittee collaboration is determined by combining the support for costs for the regional workgroup meetings, the costs for participating in regional workgroup meetings, and the workgroup expenditures as described in detail below.

a. Support for Regional Workgroup Meetings

i. Period considered for summation of costs for this category

The period of summation for regional workgroup meetings is from January 24, 2007, or the effective date of the 2007 Permit, to June 26, 2013, which is the day before the effective date of the 2013 Permit. These meetings included program planning and development in response to 2007 Permit requirements that began after the 2007 Permit was adopted. The regional workgroup continued to support Co-Permittees throughout the duration of the 2007 Permit. After the 2013 Permit went into effect, regional workgroup meetings were no longer required in the same way as they had been under the 2007 Permit, so regional workgroup costs are not claimed after that date.

ii. Rationale for selection of cost formula format used for this category



Regional Workgroup Meeting Support costs were shared among Co-Permittees per an agreed upon MOU or similar cost sharing agreement and were documented in workgroup and cost sharing records as described in more detail below. This information can be used to identify the cost share of each Co-Permittee.

iii. Regional Workgroup Meeting Support cost formula and components

The formula and components of the formula were determined by reviewing the Regional Cost Sharing Documentation (Vol. 13, pp 10917-13074). Using this information, I have determined that a reasonable reimbursement formula based on actual costs was most appropriate. The reasonable reimbursement formula for the costs associated with Support for Regional Workgroup Meetings is as follows:

$$Reimbursement = \sum_{t=FY06/07}^{FY12/13} [(County Cost)(MOU)]_t$$

where “*County Cost*” are the actual costs spent to support the various all Co-Permittee meetings; and “*MOU*” is the Co-Permittees’ proportional share of the costs based on the MOUs.

The *County Costs* in this formula are Regional Workgroup Expenditures specifically designated as meeting support; these expenses do not overlap and are not included in other reimbursement formulae (e.g., FRA Workgroup expenses in Section 17.b). These expenditures were reported by the following workgroups: ERS, FRA, ICS, LD, MON, MUNI, PPS, WURMP. Expenditures data can be found in the County Watershed Workgroup Expenditure Records (Vol. 13, pp. 10908-10916-) and the Regional Cost Sharing Documentation (Vol. 13, pp. 19017-13074). The yearly *County Costs* are:

<b>Fiscal Year</b>	<b>County Costs</b>
FY 2008/2009	\$57,285.40
FY 2009/2010	\$69,576.92
FY 2010/2011	\$44,665.30
FY 2011/2012	\$56,311.45

Although reimbursement would be proper for the full summation period described above, there were only actual costs reported for a portion of this time.

b. Regional Workgroup Meeting Participation

i. Period considered for summation of costs for this category

The period of summation for regional workgroup meeting participation is from January 24, 2007, or the effective date of the 2007 Permit, to June 26, 2013, which is the day before the effective date of the 2013 Permit. The rationale is the same as that provided for item 19.a above.

In accordance with the above reimbursement period, the following conservative adjustments are proposed to the regional workgroup meeting participation costs for the 2006/2007 and 2012/2013 years. The 2006/2007 cost claimed should be reduced to 43.29% of the cost. This reflects that 158 of the 365 days in fiscal year 2006/2007 were on or after January 24, 2007. The 2012/2013 costs claimed should be 98.90% of the reported costs. This reflects that 361 of the 365 days in fiscal year 2012/2013 were on or before June 26, 2013.

ii. Rationale for selection of cost formula format used for this category

The formula and components for Regional Workgroup Meeting Participation are the same as that used for Watershed Workgroup Meeting Participation described in item 15.d above. The same unit cost was applied for both meeting types because the Co-Permittee Declarations included all types of meeting attendance (regional and watershed) in their reported meeting attendance data, and in my experience the group of Co-Permittee staff that attended regional meetings was comparable to the group of Co-Permittee staff that attended watershed meetings.

iii. Regional Workgroup Meeting Participation cost formula

The formula and components of the formula were determined by reviewing the Co-Permittee Declarations (Vol. 1, pp. 377-743). Using this information, I have determined that a formula based on a standard unit cost would be most appropriate for this category. The reasonable reimbursement formula for Regional Workgroup Meetings is as follows:

$$Reimbursement = \sum_{t=FY06/07}^{FY12/13} [(Rate)(\#Meeting Attendances)]_t$$

where “Rate” is the cost of the Co-Permittee employee’s time per regional workgroup meeting, and “# Meeting Attendances” is the number of times a representative of a Co-Permittee attended a regional workgroup meeting.

iv. Regional Workgroup Meeting Participation standard unit cost

The value of *Rate* is the same as described in Section 15.d above (Watershed Workgroup Meetings) and is \$262.88.

c. Regional Workgroup Expenditures

i. Period considered for summation of costs for this category

The period of summation for regional workgroup meeting participation is from January 24, 2007, or the effective date of the 2007 Permit, to June 26, 2013, which is the day before the effective date of the 2013 Permit. The rationale is the same as that provided for item 19.a above.

ii. Rationale for selection of cost formula format used for this category

Regional Workgroup Expenditure costs were shared among Co-Permittees per an agreed upon MOU or similar cost sharing agreement and were documented in workgroup and cost sharing records as described in more detail below. This information can be used to identify the cost share of each Co-Permittee.

iii. Regional Workgroup Expenditure cost formula and components

The formula and components of the formula were determined by reviewing the Regional Cost Sharing Documentation (Vol. 13, pp. 10917-13074). Using this information, I have determined that a reasonable reimbursement formula based on actual costs was most appropriate. The reasonable reimbursement formula for the costs of the Workgroup Expenditures is as follows:

$$Reimbursement = \sum_{t=06/07}^{FY12/13} [(Workgroup Costs)(MOU)]_t$$

where “*Workgroup Costs*” are the actual costs of activities performed by the regional workgroups; and “*MOU*” is the Co-Permittees’ proportional share of the cost based on the MOUs.

The *Workgroup Costs* included for summation in this category are those costs incurred by the Regional Workgroups designated as being specifically for coordination with working bodies. The only Regional Workgroup to report costs in this category was the Program Planning Subcommittee. The yearly *Workgroup Costs* are:

<b>Fiscal Year</b>	<b>Workgroup Costs</b>	<b>Location of Data</b>
FY 2008/2009	\$270.97	Vol. 13, p 10,973
FY 2009/2010	\$147.13	Vol. 13, p 11,594

Although reimbursement would be proper for the full period of summation outlined above, costs were only identified for a portion of this time.

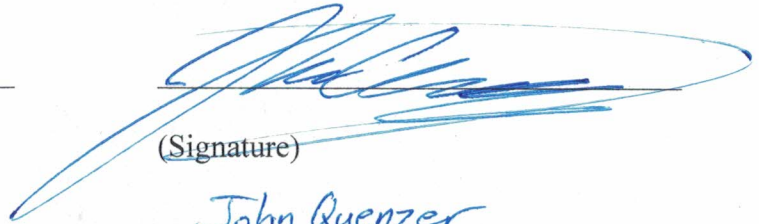
20. Total Reimbursement (Part L.1.a.(3)-(6)).

The foregoing RRM's allow for each Co-Permittee to submit individually for reimbursement in each of the categories with supporting documentation evidencing their participation in and implementation of each unfunded mandate category. The total reimbursement amount for each Co-Permittee will be the sum of the Co-Permittees' reimbursement amount for each category described above. Guidance on how reimbursement amounts may be calculated and claimed for each category is provided in Appendix A.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

12/13/2024, San Diego, CA

(Date and Place)

  
John Quenzer

(Signature)

(Name)

## Appendix A. Guidance on Process for Co-Permittees to Calculate Reimbursable Amounts

The following provides guidance for Co-Permittees on calculating reimbursable amounts per the identified cost formulae.

### 12. Reporting on Street Sweeping and Conveyance System Cleaning (Part J.3.a.(3)(c) (iv)-(viii), (x)-(xv))

Tables illustrating the inputs necessary to calculate the reimbursable amounts by year and overall for each Co-Permittee for conveyance system cleaning reporting and street sweeping reporting are provided below. The “Reimbursable Amount” is the “Unit cost” times the “CPI adjustment” times the “Quantity of activity.” No CPI adjustment is applied to data from 2007/2008 through 2009/2010 (i.e., a CPI adjustment of 1.0 was used) because the standard unit cost was developed based on data from these years. A CPI adjustment is applied to following years, beginning in 2010/2011, using 2009/2010 as the base year.

The 2007/2008 reporting cost claimed should be 27.05% of the standard unit cost for reporting. This reflects that 99 days of the 366 days in fiscal year 2007/2008 were on or after March 24, 2008. The 2012/2013 reporting cost claimed should be 98.90% of the standard unit cost for reporting. This reflects that 361 of the 365 days in fiscal year 2012/2013 were on or before June 26, 2013.

Each Co-Permittee will need to certify that it completed the relevant type of reporting in each of the years shown below. If such reporting was not completed in any year, the Co-Permittee will reduce the “Quantity of activity” and reimbursement amount to zero (0) for that type of reporting for that fiscal year. Whether street sweeping and conveyance system cleaning reporting were completed is anticipated to be based primarily on JRMP annual reports, which were previously submitted to the San Diego Water Board and include signed certification statements from applicable Co-Permittees.

#### Conveyance System Cleaning Reporting

Year	Unit cost	CPI adjustment	Quantity of activity*	Reimbursable Amount
FY 2007/2008	\$5,784.85	1.0000	[1]	[2]
FY 2008/2009	\$5,784.85	1.0000	[1]	[2]
FY 2009/2010	\$5,784.85	1.0000	[1]	[2]
FY 2010/2011	\$5,784.85	1.0132	[1]	[2]
FY 2011/2012	\$5,784.85	1.0439	[1]	[2]
FY 2012/2013	\$5,784.85	1.0606	[1]	[2]
<b>Total Reimbursable Amount for Conveyance System Cleaning Reporting</b>				[3]

### Street Sweeping Reporting

Year	Unit cost	CPI adjustment	Quantity of activity*	Reimbursable Amount
FY 2007/2008	\$6,143.67	1.0000	[1]	[2]
FY 2008/2009	\$6,143.67	1.0000	[1]	[2]
FY 2009/2010	\$6,143.67	1.0000	[1]	[2]
FY 2010/2011	\$6,143.67	1.0132	[1]	[2]
FY 2011/2012	\$6,143.67	1.0439	[1]	[2]
FY 2012/2013	\$6,143.67	1.0606	[1]	[2]
<b>Total Reimbursable Amount for Street Sweeping Reporting</b>				[3]

Notes for above tables

\* Quantities of activities in 2007/2008 and 2012/2013 have been adjusted to reflect implementation during partial fiscal years, as described in item 12.a.

[1] Co-Permittee to fill in quantities. For all years except 2007/2008 and 2012/2013, enter "1" if reporting was completed. For 2007/2008, if reporting was completed, enter 0.2705. For 2012/2013, if reporting was completed, enter 0.9890.

[2] To be calculated as Unit cost x CPI adjustment x Quantity of activity.

[3] Sum of the Reimbursable Amount values for each year.

### 13. Conveyance System Cleaning (Part D.3.a.(3)(b)(iii))

Tables illustrating the inputs necessary to calculate the reimbursable amounts by year and overall for each Co-Permittee for conveyance system cleaning are provided below. The “Reimbursable Amount” is the “unit cost” times the “CPI adjustment” times the “Quantity of activity.” No CPI adjustment is applied to data from 2007/2008 (i.e., a CPI adjustment of 1.0 was used) because the standard unit cost was developed based on data from that year. A CPI adjustment is applied to following years, beginning in 2007/2008, using 2007/2008 as the base year. Each Co-Permittee will need to fill in the quantities of activities completed (e.g., inlets or catch basins cleaned) in each of the years shown below. Quantities of cleaning completed are anticipated to be based primarily on JRMP and WURMP annual reports, which were previously submitted to the San Diego Water Board and include signed certification statements from applicable Co-Permittees.

In accordance with the reimbursement period described earlier in this section, the following adjustments are proposed to the conveyance system cleaning costs for the 2007/2008 and 2014/2015 fiscal years. If Co-Permittees have data to identify the quantities of cleaning completed during the period when they were required to implement their 2007 Permit JURMPs in 2007/2008 and 2014/2015, they should use those quantities in the reimbursement formulae. If such data is not available, and only the quantities cleaned in each entire fiscal year are known, the quantities cleaned in 2007/2008 and 2014/2015 should be adjusted as follows. The 2007/2008 quantities of cleaning performed should be 27.05% of the fiscal year total. This reflects that 99 days of the 366 days in fiscal year 2007/2008 were on or after March 24, 2008. The 2014/2015 quantities of cleaning performed should be at most 98.90% of the fiscal year total. This reflects that 361 of the 365 days in fiscal year 2014/2015 were on or before June 26, 2015. If a Co-Permittee submitted and began implementing its JRMP earlier than June 26, 2015, the percentage of fiscal year 2014/2015 included would be reduced accordingly.

#### Storm Drain Inlet Cleaning

Year	Unit cost	CPI adjustment	Quantity of activity (drain cleanings)	Reimbursable Amount
FY 2007/2008*	\$150.66	1.0000	[1]	[2]
FY 2008/2009	\$150.66	1.0385	[1]	[2]
FY 2009/2010	\$150.66	1.0384	[1]	[2]
FY 2010/2011	\$150.66	1.0520	[1]	[2]
FY 2011/2012	\$150.66	1.0840	[1]	[2]
FY 2012/2013	\$150.66	1.1013	[1]	[2]
FY 2013/2014	\$150.66	1.1157	[1]	[2]
FY 2014/2015**	\$150.66	1.1364	[1]	[2]
<b>Total Reimbursable Amount for Storm Drain Inlet Cleaning</b>				[3]

### MS4 Pipe Cleaning

Year	Unit cost	CPI adjustment	Quantity of activity (linear feet cleaned)	Reimbursable Amount
FY 2007/2008*	\$6.77	1.0000	[1]	[2]
FY 2008/2009	\$6.77	1.0385	[1]	[2]
FY 2009/2010	\$6.77	1.0384	[1]	[2]
FY 2010/2011	\$6.77	1.0520	[1]	[2]
FY 2011/2012	\$6.77	1.0840	[1]	[2]
FY 2012/2013	\$6.77	1.1013	[1]	[2]
FY 2013/2014	\$6.77	1.1157	[1]	[2]
FY 2014/2015**	\$6.77	1.1364	[1]	[2]
<b>Total Reimbursable Amount for MS4 Pipe Cleaning</b>				[3]

### Channel Cleaning

Year	Unit cost	CPI adjustment	Quantity of activity (linear feet cleaned)	Reimbursable Amount
FY 2007/2008*	\$8.52	1.0000	[1]	[2]
FY 2008/2009	\$8.52	1.0385	[1]	[2]
FY 2009/2010	\$8.52	1.0384	[1]	[2]
FY 2010/2011	\$8.52	1.0520	[1]	[2]
FY 2011/2012	\$8.52	1.0840	[1]	[2]
FY 2012/2013	\$8.52	1.1013	[1]	[2]
FY 2013/2014	\$8.52	1.1157	[1]	[2]
FY 2014/2015**	\$8.52	1.1364	[1]	[2]
<b>Total Reimbursable Amount for Channel Cleaning</b>				[3]

Notes for above tables

\* For 2007/2008, based on quantity of activity on or after March 24, 2008. See text preceding tables for additional details.

\*\* For 2014/2015, based on quantity of activity on or before June 26, 2015, or the date of 2013 Permit JRMP submittal to the San Diego Water Board, whichever came first. See text preceding tables for additional details.

[1] Co-Permittee to fill in quantities.

[2] To be calculated as Unit cost x CPI adjustment x Quantity of activity.

[3] Sum of the Reimbursable Amount values for each year.



**14. Educational Component (Parts D.5.a.(1), D.5.a.(2), D.5.b.(1)(a), D.5.b.(1)(b)(iii.-vi.), D.5.b.(1)(c), D.5.b.(1)(d), D.5.b.(2), D.5.b.(3))**

***14.a Regional Outreach Shared Costs – Residential Education Program Development and Implementation cost formula***

A table illustrating the inputs necessary to calculate the reimbursable amounts by year and overall for each Co-Permittee for Regional Residential Education Program Development and Implementation are provided below. The “Reimbursable Amount” is the “County Regional Education Costs” times the “Co-Permittee Share of Costs (%)”. No CPI adjustment is applied to this category as it is assumed that County costs are reported in dollar values for the year in which they were incurred. Each Co-Permittee will verify the value of the MOU responsibility for each year (represented as % of total costs a jurisdiction is responsible for covering). The Co-Permittee share of cost values will be based on calculations outlined in the Co-Permittee MOUs (Vol. 13, pp 10,785-10,907).

In accordance with the above reimbursement period, the following conservative adjustments are proposed to the Residential Education Program Development and Implementation costs for the 2006/2007 and 2012/2013 years. The 2006/2007 Residential Education Program Development and Implementation cost claimed should be reduced to 43.29% of the cost. This reflects that 158 of the 365 days in fiscal year 2006/2007 were on or after January 24, 2007. The 2012/2013 costs claimed should be 98.90% of the costs. This reflects that 361 of the 365 days in fiscal year 2012/2013 were on or before June 26, 2013.

<b>Year</b>	<b>County Education Costs</b>	<b>Co-Permittee Share of Costs (%)</b>	<b>Quantity of Activity*</b>	<b>Reimbursable Amount</b>
FY2006/2007	-	[1]	[2]	[3]
FY2007/2008	\$219,226.90	[1]	[2]	[3]
FY2008/2009	\$438,452.75	[1]	[2]	[3]
FY2009/2010	\$876,907.50	[1]	[2]	[3]
FY2010/2011	\$920,752.90	[1]	[2]	[3]
FY2011/2012	\$966,791.36	[1]	[2]	[3]
FY2012/2013	\$138,040.00	[1]	[2]	[3]
<b>Total Reimbursable Amount for Regional Residential Education Program Development and Implementation</b>				[4]

Notes for above table

\* Quantity for activities implemented in 2006/2007 and 2012/2013 shall be adjusted to reflect implementation during partial fiscal years. See note [2] below for additional details.

[1] Co-Permittee to fill in percentage of County Regional Education Cost Co-Permittee was responsible for in a given year based on established calculation approaches in MOUs.

[2] Co-Permittee to fill in quantities. For all years except 2006/2007 and 2012/2013 value will be “1”. For FY2006/2007, enter 0.4329. For 2012/2013, enter 0.9890.

[3] To be calculated as County Regional Education Costs x MOU Responsibility x Quantity of Activity

[4] Sum of the Reimbursable Amount values for each year

***14.b Jurisdictional Educational Programs***

A table illustrating the inputs necessary to calculate the reimbursable amounts by year and overall for each Co-Permittee for jurisdictional education program costs is provided below. The

“Reimbursable Amount” is determined by multiplying the “Standard %,” “Annual Stormwater Expenditures”, and “Quantity of Activity.” No CPI adjustment is applied in this formula because Annual Stormwater Expenditures will be reported in the dollar value of the respective year. Each Co-Permittee will need to fill in the value of their annual stormwater expenditures for each of the years in the table below. The annual stormwater expenditures values are anticipated to be based primarily on JRMP annual reports, which were previously submitted to the San Diego Water Board and include signed certification statements from applicable Co-Permittees.

In accordance with the reimbursement period described earlier in this section, the following adjustments are proposed to the conveyance system cleaning costs for the 2007/2008 and 2014/15 fiscal years. The 2007/2008 value of annual stormwater expenditures should be 27.05% of the fiscal year total. This reflects that 99 days of the 366 days in fiscal year 2007/2008 were on or after March 24, 2008. The 2014/2015 value of annual stormwater expenditures should be at most 98.90% of the fiscal year total. This reflects that 361 of the 365 days in fiscal year 2014/2015 were on or before June 26, 2015. If a Co-Permittee submitted and began implementing its JRMP earlier than June 26, 2015, the percentage of fiscal year 2014/2015 included would be reduced accordingly.

<b>Year</b>	<b>Standard %</b>	<b>Annual Stormwater Expenditures</b>	<b>Quantity of Activity*</b>	<b>Reimbursable Amount</b>
FY 2007/2008	2.16%	[1]	[2]	[3]
FY 2008/2009	2.16%	[1]	[2]	[3]
FY 2009/2010	2.16%	[1]	[2]	[3]
FY 2010/2011	2.16%	[1]	[2]	[3]
FY 2011/2012	2.16%	[1]	[2]	[3]
FY 2012/2013	2.16%	[1]	[2]	[3]
FY 2013/2014	2.16%	[1]	[2]	[3]
FY 2014/2015	2.16%	[1]	[2]	[3]
<b>Total Reimbursable Amount for Jurisdictional Education Program Costs</b>				[4]

Notes for above table

\* Quantity for activities implemented in 2007/2008 and 2014/2015 to be adjusted to reflect implementation during partial fiscal years, as described in item 14.b.i

[1] Co-Permittee to fill in value of annual total stormwater expenditures reported annually.

[2] Co-Permittee to fill in quantities. For all years except 2007/2008 and 2014/2015 value will be “1” if Co-Permittee contributed to County Costs. For FY2007/2008 if Co-Permittee will enter 0.2705. For 2014/2015, Co-Permittee will enter 0.9890.

[3] To be calculated as Standard % x Annual Stormwater Expenditures x Quantity of Activity

[4] Sum of the Reimbursable Amount values for each year

## 15. Watershed Activities and Collaboration in the WURMP (Part E.2.f & E.2.g)

### 15.a Watershed Workgroup Cost Share Contributions

A table illustrating the inputs necessary to calculate the reimbursable amounts by watershed, fiscal year, and Co-Permittee share of watershed costs is below. Co-Permittees in more than one watershed with shared costs would prepare one table per watershed. For such Co-Permittees, the total reimbursable amount for watershed workgroup cost share contributions would be the sum of the total reimbursable amount for each watershed in which the Co-Permittee had shared costs.

Year	Watershed Lead Cost	Co-Permittee Share of Costs for Watershed [X] (%)	Reimbursable Amount
FY 2006/2007*	[1]	[2]	[3]
FY 2007/2008	[1]	[2]	[3]
FY 2008/2009	[1]	[2]	[3]
FY 2009/2010	[1]	[2]	[3]
FY 2010/2011	[1]	[2]	[3]
FY 2011/2012	[1]	[2]	[3]
FY 2012/2013	[1]	[2]	[3]
<b>Total Reimbursable Amount for [X] Watershed Workgroup Cost Share Contributions</b>			[4]

Notes for above table

\* Within Fiscal Year 2006/2007, only work on or after January 24, 2007, the effective date of the 2007 Permit, may be claimed.

[X] is the name of the watershed, e.g., San Dieguito. Co-Permittees in more than one watershed with shared costs would complete a separate table for each watershed.

[1] Co-Permittee to fill in total value of watershed workgroup shared costs for the given watershed and fiscal year.

[2] Co-Permittee to fill in Co-Permittees percent of the watershed workgroup shared costs for the given watershed and fiscal year.

[3] To be calculated as Total Shared Costs for Watershed [X] times Co-Permittee Share of Costs for Watershed [X].

[4] Sum of the Reimbursable Amount values for each year

### 15.b Jurisdiction Watershed Activities

A table illustrating the inputs necessary to calculate the reimbursable amounts by year and overall for each Co-Permittee for jurisdiction watershed activities is provided below. The “Reimbursable Amount” is the “Unit Cost” times the “CPI adjustment” times the “Number of Watersheds” times the “Quantity of activity”. A CPI adjustment is applied to years following FY07/08 using FY07/08 as the base year because the standard unit cost was developed based on data from this year. Each Co-Permittee will need to certify that it completed watershed activities in the years shown below. Quantities of jurisdictional watershed activities are anticipated to be based primarily on WURMP annual reports, which were previously submitted to the San Diego Water Board and include signed certification statements from applicable Co-Permittees.

In accordance with the reimbursement period described earlier in this section, the following adjustments are proposed to the jurisdiction watershed activities costs for the 2007/2008 and 2012/2013 fiscal years. The 2007/2008 quantities of activities should be 27.05% of the fiscal year total. This reflects that 99 days of the 366 days in fiscal year 2007/2008 were on or after March 24, 2008. The 2012/2013 quantities should be 98.90% of the fiscal year total. This reflects that 361 of the 365 days in fiscal year 2012/2013 were on or before June 26, 2013.

<b>Year</b>	<b>Unit Cost</b>	<b>CPI Adjustment</b>	<b>Number of Watersheds</b>	<b>Quantity of Activity*</b>	<b>Reimbursable Amount</b>
FY2007/2008	\$2,500	1.0000	[1]	[2]	[3]
FY2008/2009	\$2,500	1.0385	[1]	[2]	[3]
FY2009/2010	\$2,500	1.0384	[1]	[2]	[3]
FY2010/2011	\$2,500	1.0520	[1]	[2]	[3]
FY2011/2012	\$2,500	1.0840	[1]	[2]	[3]
FY2012/2013	\$2,500	1.1013	[1]	[2]	[3]
<b>Total Reimbursable Amount of Jurisdiction Watershed Activities</b>					[4]

Notes for above table

\* Quantity for activities implemented in 2007/2008 and 2012/2013 to be adjusted to reflect implementation during partial fiscal years, as described in item 15.b.i

[1] Co-Permittee to fill in value of number of watersheds jurisdiction is located in.

[2] Co-Permittee to fill in quantities with adjustments for 2007/2008 and 2012/2013 years as appropriate.

[3] To be calculated as Unit Cost x CPI Adjustment x Number of Watersheds x Quantity of Activity

[4] Sum of the Reimbursable Amount values for each year

### ***15.c Regional Watershed Activities – WURMP***

A table illustrating the inputs necessary to calculate the reimbursable amounts by year and overall for each Co-Permittee’s Regional Watershed Activities – WURMP costs is provided below. Each Co-Permittee will need to input its percent share of the overall costs, based on the Co-Permittee MOU in place at that time. The “Reimbursable Amount” for each year is the “Total Shared Costs” times the “Co-Permittee Share of Costs (%)”. The overall total reimbursable amount is the sum of the Reimbursable Amount for each year. The amounts of shared costs identified to date are shown in the table below.

<b>Year</b>	<b>WURMP Costs</b>	<b>Co-Permittee Share of Costs (%)</b>	<b>Reimbursable Amount</b>
FY 2007/2008*	-	[1]	[2]
FY 2008/2009	\$2,737.91	[1]	[2]
FY 2009/2010	\$3,287.23	[1]	[2]
FY 2010/2011*	-	[1]	[2]
FY 2011/2012*	-	[1]	[2]
FY 2012/2013*	-	[1]	[2]
<b>Total Reimbursable Amount for Regional Watershed Activities - WURMP</b>			[3]

Notes for above table

\* Regional Watershed Activity costs for these fiscal years were not identified in the documentation reviewed. Should Co-Permittees identify additional costs for these years, it would also be appropriate to claim reimbursement for those expenses, provided that they provide appropriate supporting documentation when submitting their claims.

[1] Co-Permittee to fill in Co-Permittee's percent share of regional watershed activities cost, based on MOU or similar agreement.

[2] To be calculated as Total Shared Costs x Co-Permittee Share of Costs

[3] Sum of the Reimbursable Amount values for each year

### ***15.d Watershed Workgroup Meetings***

A table illustrating the inputs necessary to calculate the reimbursable amounts by year and overall for each Co-Permittee's Watershed Workgroup Meeting costs is provided below. Each Co-Permittee will need to input its quantity of watershed workgroup meeting attendances for each fiscal year. Co-Permittees that participated in multiple watershed (WURMP) workgroups will include the sum of all watershed meeting attendances in the "Quantity of activity" column. The "Reimbursable Amount" for each year is the "Unit cost" times the "CPI adjustment" times the "Quantity of activity." The overall total reimbursable amount is the sum of the Reimbursable Amount for each year. Note that the CPI adjustment for FY 2006/2007 is less than 1.0 because the unit cost is based on FY 2007/2008 data.

In accordance with the above reimbursement period, the following conservative adjustments are proposed to the watershed workgroup meetings costs for the 2006/2007 and 2012/2013 years. The 2006/2007 cost claimed should be reduced to 43.29% of the cost. This reflects that 158 of the 365 days in fiscal year 2006/2007 were on or after January 24, 2007. The 2012/2013 costs claimed should be 98.90% of the costs. This reflects that 361 of the 365 days in fiscal year 2012/2013 were on or before June 26, 2013.

Meeting attendance data is anticipated to come primarily from WURMP annual reports (Vol. 13, pp. 1-10756).

<b>Year</b>	<b>Unit cost for 1 person to attend 1 meeting</b>	<b>CPI adjustment</b>	<b>Quantity of activity (meeting attendances)</b>	<b>Reimbursable Amount</b>
FY 2006/2007*	\$262.88	0.9776	[1]	[2]
FY 2007/2008	\$262.88	1.0000	[1]	[2]
FY 2008/2009	\$262.88	1.0385	[1]	[2]
FY 2009/2010	\$262.88	1.0384	[1]	[2]
FY 2010/2011	\$262.88	1.0520	[1]	[2]
FY 2011/2012	\$262.88	1.0840	[1]	[2]
FY 2012/2013**	\$262.88	1.1013	[1]	[2]
<b>Total Reimbursable Amount for Watershed Workgroup Meetings</b>				<b>[3]</b>

Notes for above table

\* For 2006/2007, only activities performed on or after January 24, 2007 (the effective date of the 2007 Permit) can be included in the "Quantity of activity".

\*\* For 2012/2013, only activities performed on or before June 26, 2013 (the day before the effective date of the 2013 Permit) can be included in the "Quantity of activity".

- [1] Co-Permittee to fill in quantity of meeting attendances. For example, 1 person attending 1 meeting is 1 meeting attendance.
- [2] To be calculated as Unit cost x CPI adjustment x Quantity of activity
- [3] Sum of the Reimbursable Amount values for each year

**16. Regional Urban Runoff Management Program, “RURMP” (Parts F.1., F.2. & F.3)**

A table illustrating the inputs necessary to calculate the reimbursable amounts by year and overall for each Co-Permittee’s RURMP costs is provided below. Each Co-Permittee will need to input its percent share of the overall costs, based on the Co-Permittee MOU in place at that time. The “Reimbursable Amount” for each year is the “Total Shared Costs” times the “Co-Permittee Share of Costs (%)”. The overall total reimbursable amount is the sum of the Reimbursable Amount for each year. The amounts of shared costs identified to date are shown in the table below.

<b>Year</b>	<b>Cost Share</b>	<b>Co-Permittee Share of Regional Costs (%)</b>	<b>Reimbursable Amount</b>
FY 2006/2007*	-	[1]	[2]
FY 2007/2008*	-	[1]	[2]
FY 2008/2009	\$2,928.91	[1]	[2]
FY 2009/2010	\$5,230.98	[1]	[2]
FY 2010/2011	\$1,926.50	[1]	[2]
FY 2011/2012*	-	[1]	[2]
FY 2012/2013*	-	[1]	[2]
<b>Total Reimbursable Amount for Regional Urban Runoff Management Program</b>			[3]

Notes for above table

\* Regional Urban Runoff Management Program costs for these fiscal years were not identified in the documentation reviewed. Should Co-Permittees identify additional costs for these years, it would also be appropriate to claim reimbursement for those expenses, provided that they provide appropriate supporting documentation when submitting their claims.

[1] Co-Permittee to fill in Co-Permittee’s percent share of regional watershed activities cost, based on MOU or similar agreement.

[2] To be calculated as Total Shared Costs x Co-Permittee Share of Costs.

[3] Sum of the Reimbursable Amount values for each year.

## 17. Program Effectiveness Assessment (Parts I.1 & I.2)

### 17.a Jurisdictional Program Effectiveness Assessment

A table illustrating the inputs necessary to calculate the reimbursable amounts by year and overall for each Co-Permittee for jurisdictional program effectiveness assessment costs is provided below. The “Reimbursable Amount” is determined by multiplying the “Standard %,” “Annual Stormwater Expenditures,” and “Quantity of Activity.” No CPI adjustment is applied in this formula because Annual Stormwater Expenditures will be reported in the dollar value of the respective year. Each Co-Permittee will need to fill in the value of their annual stormwater expenditures for each of the years in the table below. The annual stormwater expenditures values are anticipated to be based primarily on JRMP annual reports, which were previously submitted to the San Diego Water Board and include signed certification statements from applicable Co-Permittees.

In accordance with the reimbursement period described earlier in this section, the following adjustments are proposed to the jurisdictional program effectiveness assessment costs for the 2007/2008 and 2014/15 fiscal years. The 2007/2008 value of annual stormwater expenditures should be 27.05% of the fiscal year total. This reflects that 99 days of the 366 days in fiscal year 2007/2008 were on or after March 24, 2008. The 2012/2013 value of annual stormwater expenditures should be at most 98.90% of the fiscal year total. This reflects that 361 of the 365 days in fiscal year 2012/2013 were on or before June 26, 2013. If a Co-Permittee submitted and began implementing its JRMP earlier than June 26, 2013, the percentage of fiscal year 2012/2013 included would be reduced accordingly.

Year	Standard %	Annual Stormwater Expenditures	Quantity of Activity*	Reimbursable Amount
FY 2007/2008	3.72%	[1]	[2]	[3]
FY 2008/2009	3.72%	[1]	[2]	[3]
FY 2009/2010	3.72%	[1]	[2]	[3]
FY 2010/2011	3.72%	[1]	[2]	[3]
FY 2011/2012	3.72%	[1]	[2]	[3]
FY 2012/2013	3.72%	[1]	[2]	[3]
<b>Total Reimbursable Amount for Jurisdictional Program Effectiveness Assessment</b>				[4]

#### Notes for above table

\* Quantity for activities implemented in 2007/2008 and 2014/2015 to be adjusted to reflect implementation during partial fiscal years. See note [2] below.

[1] Co-Permittee to fill in value of annual total stormwater expenditures reported annually.

[2] Co-Permittee to fill in quantities. For all years except 2007/2008 and 2012/2013 value will be “1” if Co-Permittee contributed to County Costs. For FY2007/2008 if Co-Permittee will enter 0.2705. For 2012/2013, Co-Permittee will enter 0.9890.

[3] To be calculated as Standard % x Annual Stormwater Expenditures x Quantity of Activity

[4] Sum of the Reimbursable Amount values for each year



**17.b Regional Fiscal, Reporting, and Assessment (“FRA”) Workgroup Expenditures**

A table illustrating the inputs necessary to calculate the reimbursable amounts by year and overall for each Co-Permittee’s FRA Workgroup costs is provided below. Each Co-Permittee will need to input its percent share of the overall costs, based on the Co-Permittee MOU in place at that time. The “Reimbursable Amount” for each year is the “Total Shared Costs” times the “Co-Permittee Share of Costs (%)”. The overall total reimbursable amount is the sum of the Reimbursable Amount for each year. The amounts of shared costs identified to date are shown in the table below.

<b>Year</b>	<b>FRA Workgroup Cost</b>	<b>Co-Permittee Share of Regional Costs (%)</b>	<b>Reimbursable Amount</b>
FY 2006/2007*	-	[1]	[2]
FY 2007/2008*	-	[1]	[2]
FY 2008/2009	\$24,466.92	[1]	[2]
FY 2009/2010	\$32,423.11	[1]	[2]
FY 2010/2011	\$72,983.57	[1]	[2]
FY 2011/2012*	-	[1]	[2]
FY 2012/2013*	-	[1]	[2]
<b>Total Reimbursable Amount for Fiscal, Reporting, and Assessment (FRA) Workgroup Expenditures</b>			<b>[3]</b>

Notes for above table

\* FRA Workgroup Expenditures costs for these fiscal years were not identified in the documentation reviewed. Should Co-Permittees identify additional costs for these years, it would also be appropriate to claim reimbursement for those expenses, provided that they provide appropriate supporting documentation when submitting their claims.

[1] Co-Permittee to fill in Co-Permittee’s percent share of regional expenditures cost, based on MOU or similar agreement.

[2] To be calculated as Total FRA Workgroup Cost x Co-Permittee Share of Costs

[3] Sum of the Reimbursable Amount values for each year

## 18. Long-Term Effectiveness Assessment (Part I.5)

A table illustrating the inputs necessary to calculate the reimbursable amounts by year and overall for each Co-Permittee's Long-Term Effectiveness Assessment costs is provided below. Each Co-Permittee will need to input its percent share of the overall costs, based on the Co-Permittee MOU in place at that time. The "Reimbursable Amount" for each year is the "Total Shared Costs" times the "Co-Permittee Share of Costs (%)". The overall total reimbursable amount is the sum of the Reimbursable Amount for each year. The amounts of shared costs identified to date are shown in the table below.

<b>Year</b>	<b>Contractor Costs</b>	<b>Co-Permittee Share of Costs (%)</b>	<b>Reimbursable Amount</b>
FY 2006/2007*	-	[1]	[2]
FY 2007/2008*	-	[1]	[2]
FY 2008/2009*	-	[1]	[2]
FY 2009/2010	\$132,212.21	[1]	[2]
FY 2010/2011	\$212,327.00	[1]	[2]
FY 2011/2012*	-	[1]	[2]
FY 2012/2013*	-	[1]	[2]
<b>Total Reimbursable Amount for Long-Term Effectiveness Assessment</b>			[3]

Notes for above table

\* Long-Term Effectiveness Assessment costs for these fiscal years were not identified in the documentation reviewed. Should Co-Permittees identify additional costs for these years, it would also be appropriate to claim reimbursement for those expenses, provided that they provide appropriate supporting documentation when submitting their claims.

[1] Co-Permittee to fill in Co-Permittee's percent share of regional expenditures cost, based on MOU or similar agreement.

[2] To be calculated as Total Shared Costs x Co-Permittee Share of Costs.

[3] Sum of the Reimbursable Amount values for each year.

## 19. All Permittee Collaboration (Part L.1.a.(3)-(6))

### 19.a Support for Regional Workgroup Meetings

A table illustrating the inputs necessary to calculate the reimbursable amounts by year and overall for each Co-Permittee's Support for Regional Workgroup Meetings costs is provided below. Each Co-Permittee will need to input its percent share of the overall costs, based on the Co-Permittee MOU in place at that time. The "Reimbursable Amount" for each year is the "Total Shared Costs" times the "Co-Permittee Share of Costs (%)". The overall total reimbursable amount is the sum of the Reimbursable Amount for each year. The amounts of shared costs identified to date are shown in the table below.

Year	County Costs	Co-Permittee Share of Costs (%)	Reimbursable Amount
FY 2006/2007*	-	[1]	[2]
FY 2007/2008*	-	[1]	[2]
FY 2008/2009	\$57,285.40	[1]	[2]
FY 2009/2010	\$69,576.92	[1]	[2]
FY 2010/2011	\$44,665.30	[1]	[2]
FY 2011/2012	\$56,311.45	[1]	[2]
FY 2012/2013*	-	[1]	[2]
<b>Total Reimbursable Amount for Support for Regional Workgroup Meetings</b>			[3]

#### Notes for above table

\* Regional Workgroup Meetings costs for these fiscal years were not identified in the documentation reviewed. Should Co-Permittees identify additional costs for these years, it would also be appropriate to claim reimbursement for those expenses, provided that they provide appropriate supporting documentation when submitting their claims.

[1] Co-Permittee to fill in Co-Permittee's percent share of regional expenditures cost, based on MOU or similar agreement.

[2] To be calculated as Total Shared Costs x Co-Permittee Share of Costs.

[3] Sum of the Reimbursable Amount values for each year.

### 19.b Regional Workgroup Meeting Participation

The process to determine reimbursable amounts for Regional Workgroup Meeting Participation is the same as that describe for Section 15.d above (Watershed Workgroup Meetings), except that the "Quantity of activity" for Regional Workgroup meetings shall reflect the Co-Permittee's number of attendances at Regional Workgroup meetings instead of watershed meetings.

Regional Workgroups include the following workgroups: Fiscal, Reporting, and Assessment (FRA); Industrial and Commercial Sources (ICS), Monitoring (MON), Municipal (Muni), Watershed Urban Runoff Management Program (WURMP), Education and Regional Sources (ERS), and Land Development (LD). Subgroups of these groups, such as the dry weather monitoring subgroup of the monitoring workgroup, are also counted as Regional Workgroups.

In accordance with the above reimbursement period, the following conservative adjustments are proposed to the regional workgroup meeting participation costs for the 2006/2007 and 2012/2013 years. The 2006/2007 cost claimed should be reduced to 43.29% of the cost. This reflects that

158 of the 365 days in fiscal year 2006/2007 were on or after January 24, 2007. The 2012/2013 costs claimed should be 98.90% of the reported costs. This reflects that 361 of the 365 days in fiscal year 2012/2013 were on or before June 26, 2013

<b>Year</b>	<b>Unit cost for 1 person to attend 1 meeting</b>	<b>CPI adjustment</b>	<b>Quantity of activity (meeting attendances)</b>	<b>Reimbursable Amount</b>
FY 2006/2007*	\$262.88	0.9776	[1]	[2]
FY 2007/2008	\$262.88	1.0000	[1]	[2]
FY 2008/2009	\$262.88	1.0385	[1]	[2]
FY 2009/2010	\$262.88	1.0384	[1]	[2]
FY 2010/2011	\$262.88	1.0520	[1]	[2]
FY 2011/2012	\$262.88	1.0840	[1]	[2]
FY 2012/2013	\$262.88	1.1013	[1]	[2]
<b>Total Reimbursable Amount for Regional Workgroup Meetings</b>				[3]

Notes for above table

\* For 2006/2007, only activities performed on or after January 24, 2007 (the effective date of the 2007 Permit) can be included in the "Quantity of activity".

[1] Co-Permittee to fill in quantity of meeting attendances. For example, 1 person attending 1 meeting is 1 meeting attendance.

[2] To be calculated as Unit cost x CPI adjustment x Quantity of activity.

[3] Sum of the Reimbursable Amount values for each year.

***19.c Regional Workgroup Expenditures***

A table illustrating the inputs necessary to calculate the reimbursable amounts by year and overall for each Co-Permittee's Regional Workgroup Expenditure costs is provided below. Each Co-Permittee will need to input its percent share of the overall costs, based on the Co-Permittee MOU in place at that time. The "Reimbursable Amount" for each year is the "Total Shared Costs" times the "Co-Permittee Share of Costs (%)". The overall total reimbursable amount is the sum of the Reimbursable Amount for each year. The amounts of shared costs identified to date are shown in the table below.

<b>Year</b>	<b>Workgroup Costs</b>	<b>Co-Permittee Share of Costs (%)</b>	<b>Reimbursable Amount</b>
FY 2006/2007*	-	[1]	[2]
FY 2007/2008*	-	[1]	[2]
FY 2008/2009	\$270.97	[1]	[2]
FY 2009/2010	\$147.13	[1]	[2]
FY 2010/2011*	-	[1]	[2]
FY 2011/2012*	-	[1]	[2]
FY 2012/2013*	-	[1]	[2]

<b>Total Reimbursable Amount for Regional Workgroup Expenditures</b>	[3]
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Notes for above table

\* Regional Workgroup Expenditures costs for these fiscal years were not identified in the documentation reviewed. Should Co-Permittees identify additional costs for these years, it would also be appropriate to claim reimbursement for those expenses, provided that they provide appropriate supporting documentation when submitting their claims.

[1] Co-Permittee to fill in Co-Permittee’s percent share of regional expenditures cost, based on MOU or similar agreement.

[2] To be calculated as Total Shared Costs x Co-Permittee Share of Costs.

[3] Sum of the Reimbursable Amount values for each year.

## 20. Total Reimbursement (Part L.1.a.(3)-(6))

To calculate the total reimbursable amount, the Co-Permittee will sum the total for each of the categories above. The table below or a similar table may be used for this calculation.

<b>Category</b>	<b>Reimbursable Amount</b>
12: Reporting on Street Sweeping	[1]
12: Reporting on Conveyance System Cleaning	[1]
13: Conveyance System Cleaning – Storm Drain Inlet Cleaning	[1]
13: Conveyance System Cleaning – MS4 Pipe Cleaning	[1]
13: Conveyance System Cleaning – Channel Cleaning	[1]
14.a: Educational Component – Regional Outreach Shared Costs – Residential Education Program Development and Implementation	[1]
14.b: Educational Component – Jurisdictional Educational Programs	[1]
15.a: Watershed Activities and WURMP – Watershed Workgroup Cost Share Contributions	[1]
15.b: Watershed Activities and WURMP – Jurisdiction Watershed Activities	[1]
15.c: Watershed Activities and WURMP – Regional Watershed Activities – WURMP	[1]
15.d: Watershed Activities and WURMP – Watershed Workgroup Meetings	[1]
16. Regional Urban Runoff Management Program	[1]
17.a: Program Effectiveness Assessment – Jurisdictional Program Effectiveness Assessment	[1]
17.b: Program Effectiveness Assessment – Regional Fiscal, Reporting, and Assessment (“FRA”) Workgroup Expenditures	[1]
18: Long-Term Effectiveness Assessment	[1]
19.a: All Permittee Collaboration – Support for Regional Workgroup Meeting	[1]
19.b: All Permittee Collaboration – Regional Workgroup Meeting Participation	[1]
19.c: All Permittee Collaboration – Regional Workgroup Expenditures	[1]
<b>Total Reimbursable Amount for All Categories</b>	<b>[2]</b>

Notes for above table

[1] Co-Permittee to fill in Co-Permittee’s category total. If there are no reimbursable expenses for a given category, enter “0”.

[2] To be calculated as the sum of all category totals.

## DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

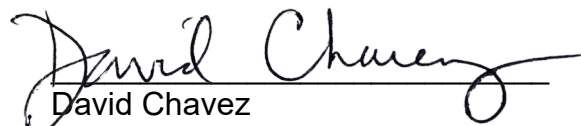
On December 17, 2024, I served the:

- **Current Mailing List dated November 21, 2024**
- **Claimants' Rebuttal Comments filed December 16, 2024**

*San Diego Regional Water Quality Control Board Order No. R9-2007-0001, Permit CAS0108758, Parts D.3.a.(3)(b)(iii), D.5.a.(1), D.5.a.(2), D.5.b.(1)(a), D.5.b.(1)(b)(iii-vi), D.5.b.(1)(c), D.5.b.(1)(d), D.5.b.(2), D.5.b.(3), E.2.f., E.2.g., F.1., F.2., F.3., I.1., I.2., I.5., J.3.a.(3)(c)(iv)-(viii), (x)-(xv), the first sentence of L.1. as it applies to the newly mandated activities, and L.1.a.(3)-(6), 07-TC-09-R County of San Diego, Cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, and Vista, Claimants*

by making it available on the Commission's website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on December 17, 2024 at Sacramento, California.



David Chavez  
Commission on State Mandates  
980 Ninth Street, Suite 300  
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(916) 323-3562

## COMMISSION ON STATE MANDATES

### Mailing List

**Last Updated:** 11/21/24

**Claim  
Number:** 07-TC-09-R

**Matter:** San Diego Regional Water Quality Control Board Order No. R9-2007-0001 Permit CAS0108758 Parts D.1.d.(7)-(8), D.1.g., D.3.a.(3), D.3.a.(5), D.5, E.2.f, E.2.g, F.1, F.2, F.3, I.1, I.2, I.5, J.3.a.(3)(c)iv-viii & x-xv, and L.

**Claimants:** City of Carlsbad  
City of Chula Vista  
City of Del Mar  
City of Encinitas  
City of Escondido  
City of Imperial Beach  
City of La Mesa  
City of Lemon Grove  
City of National City  
City of Oceanside  
City of Poway  
City of San Diego  
City of San Marcos  
City of Santee  
City of Solana Beach  
City of Vista

### **TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:**

Each commission mailing list is continuously updated as requests are received to include or remove any party or person on the mailing list. A current mailing list is provided with commission correspondence, and a copy of the current mailing list is available upon request at any time. Except as provided otherwise by commission rule, when a party or interested party files any written material with the commission concerning a claim, it shall simultaneously serve a copy of the written material on the parties and interested parties to the claim identified on the mailing list provided by the commission. (Cal. Code Regs., tit. 2, § 1181.3.)



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