



City of Imperial Beach Jurisdictional Urban Runoff Management Program

Annual Report Fiscal Year 2008-09

Submitted by the
City of Imperial Beach
Department of Public Works
495 10th Street
Imperial Beach, CA 91932
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EXECUTIVE SUMMARY

This Annual Report summarizes the activities implemented by the City of Imperial Beach (City) in fulfillment of the Jurisdictional Urban Runoff Management Program (JURMP) requirements of Order R9-2007-0001 – the San Diego Municipal Storm Water Permit. With limited exception, the report covers activities conducted between July 1, 2008 and June 30, 2009 (FY2008-09).

The purpose of the JURMP Annual Report is threefold: 1) to document the City's compliance with Municipal Storm Water Permit requirements, 2) to assess the effectiveness of program implementation, and 3) to serve as a program planning tool for directing future activities. The report reflects the organization of the Municipal Storm Water Permit, and is divided into several components corresponding to major sources of pollutants or areas of activity. The following are highlights and major accomplishments for each major JURMP component during this fiscal year.

Development Planning

The Development Planning Component involves incorporating storm water and urban runoff management into the development project review process. Major accomplishments during this fiscal year included the following:

- Conditioned 24 discretionary projects requiring developers or contractors to implement minimum best management practices (BMPs) and low impact development (LID) requirements to reduce pollutants and runoff to the maximum extent practicable (MEP). This compares to 48 projects during FY 2007-08 and 51 projects during FY2006-07.
- No Water Pollution Control Plans subject to the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements were approved during the reporting period. The City had 2 active SUSMP projects carry over from the previous reporting period, one of which was along the water front and managed by the Port of San Diego. The City also reviewed another 4 SUSMP projects that were not approved during FY 2008-09.
- Verified operation and maintenance of 16 permanent post construction treatment control BMPs including 1 new additional treatment control BMP location.
- Participated with San Diego Copermittees in the development of the Hydromodification Management Plan (HMP), which is currently under review.
- Provided storm water education to developers and contractors through face-to-face interactions with City staff in meetings, during counter hours held at the Community Development Department, and through informative brochures provided during the application process.

Construction Component

The Municipal Storm Water Permit requires the City to oversee compliance with construction-phase BMPs at all construction projects in the City. Major accomplishments during FY2008-09 included the following:

- Inspected a total of 51 active construction projects including 10 Capital Improvement Projects (CIP) and 1 Priority SUSMP project during the reporting period. Approximately 233 inspections were performed to verify the proper installation and maintenance of construction phase BMPs.
- Performed daily oversight of construction BMP compliance at all 10 CIP projects that were in active construction phase.
- Responded to 10 reports of illegal discharges from construction sites. No notices of violations were issued to construction developers or contractors at any discretionary project location. Verbal warnings were sufficient to bring violators into compliance.
- Discussed urban runoff management requirements with all applicants at project intake, and emphasized requirements again during follow-up inspections.

Municipal Component

City employees, particularly field staff, continued to implement best management practices (BMPs) to prevent illegal discharge of water and pollutants to the storm drain system.

Examples of BMPs implemented at municipal facilities included:

- Vehicle washing in wash bays that drain to the sanitary sewer.
- Preventive maintenance of City vehicles to prevent fluid leakage.
- Use of high-power vacuum to capture runoff from graffiti abatement, sidewalk grinding, and spill cleanup.
- Strict limitations on the use of fertilizers and pesticides in parks and landscape areas.
- Monitoring of sprinkler systems to prevent over-topping onto roadways.
- Alarming of all sewage pump stations, thereby reducing the likelihood of a sewage spill to the storm drain system.
- Purchase and use of spill barriers, gravel bags, and absorbent rags for spill containment and cleanup.

- Annual storm water training for the Public Works Department on the use of BMPs in daily operations.

Other notable accomplishments during FY2008-09 were:

- Inspected and cleaned 100% of municipal storm drain system and removed 4,130 pounds of sediment, trash, and organic materials through storm drain cleaning.
- Removed an additional 206 tons of material through frequent street sweeping.
- Continued maintenance of the 10th St. and Imperial Beach Blvd. vortex storm water interceptor to remove sediment, floating hydrocarbons, and debris from all levels of flow.
- Quarterly maintenance of 13 municipal storm drain filter inserts including one new additional filter installed this reporting period at the Imperial Beach Sports Park parking lot.
- Continued operation of the Date Avenue urban runoff diversion system, which diverts nuisance runoff to the sanitary sewer during low-flow conditions.
- Completed the Palm Avenue urban runoff diversion system at Seacoast Avenue. The City now operates 2 low-flow urban runoff diverters (Palm and Date Ave.) along the beach front. Both diverters have the capacity to divert up to 250 gallons per minute of urban runoff and first flush rain water.
- Completed phase 1 of the City Hall and Fire Station xeriscaping project.
- Performed daily cleanup of trash, litter, and debris along the beach and tidelands area on Seacoast Drive.

Industrial and Commercial Component

The City is tasked with educating businesses about urban runoff management and overseeing their compliance with applicable Municipal Storm Water Permit requirements. Significant progress continues to be made on increasing knowledge on urban runoff management among local businesses. The following are the major accomplishments achieved during this reporting period:

- Conducted 50 inspections most of which were high priority businesses, including automotive repair shops, restaurants, bars, gas stations, car washes, grocery stores, and mobile home parks. This is 23 more inspections than were conducted last reporting period. Inspections revealed some BMP deficiencies, but on the whole, most

businesses were knowledgeable of the urban runoff management requirements. Following each inspection the City mails the business owner a copy of the inspection form, an inspection report, and a BMP for your business brochure.

- Responded to 21 enforcement actions to businesses and issued 4 notices of violation as part of the enforcement and case resolution process. Other deficiencies were resolved with verbal warnings.
- The City participated with the Copermittees in the Regional development of an online mobile business database tracking system, which will be implemented during next reporting period. The database tracks active mobile businesses and violations issued by other jurisdictions.

Residential Component

The Residential Component involves 1) educating Imperial Beach residents about urban runoff management, 2) overseeing residential compliance with BMP requirements and discharge prohibitions, and 3) facilitating proper disposal and recycling of household hazardous waste and used motor oil. Major accomplishments during this reporting period included the following:

- Identified and mitigated 55 residential violations. This compares to 13, 42, 50, and 46 in the previous four years, respectively. The most commonly observed violations involved construction debris, automotive fluids, wash water, detergents or chemicals, chlorinated swimming pool water, and green waste.
- Issued 17 notices of violation and 1 notices of abatement as part of the enforcement and case resolution process. Other deficiencies were resolved with verbal warnings and/or letters. No fines were issued to residents during this reporting period.
- Distributed educational brochures to residents throughout the year. Brochures target the following high priority activities: 1) pollution prevention around the home, 2) disposal of pet waste, 3) car washing, 4) proper disposal of motor oil, and 5) lawn and garden care.
- Educated residents on environmental issues including storm water in the City's semi-annual newsletters and a quarterly newsletter distributed by EDCO.
- Participated in the Regional Education and Residential Sources workgroup as co-chair of the group and chair of the Underserved Target Audience sub-workgroup.
- Approximately 5,762 pounds of household hazardous waste, 2,433 pounds of universal and e-waste, and 2,172 pounds of used oil and other fluids were properly disposed of at the South Bay Household Hazardous Waste facility in Chula Vista.

- The City held its annual Citywide Garage Sale event followed next week by the annual Home Front Clean Up, which resulted in the proper disposal of 154 tons of trash, construction, metal, and green waste.

Illicit Discharge Detection and Elimination Component

The City endeavors to prevent discharges from the Municipal Separate Storm Sewer System (MS4) from causing or contributing to a violation of water quality standards. The Illicit Discharge Detection and Elimination Component involves 1) water quality monitoring during the dry weather season (May through September) to detect illicit discharges to the storm drain system, and 2) year-round response to complaints and referrals of urban runoff discharge violations.

All components of the JURMP are represented in this report with the exception of this component. The San Diego Regional Water Quality Control Board adopted Addendum No. 2 to Order No. R9-2007-0001 (Municipal Permit), extended the annual reporting deadline associated with this component from September 30th to December 15th. This change was necessary because the program involves water quality monitoring during the dry season, defined as May 1st through September 30th, which does not allow for proper time in which to report and convey information on the dry season as a whole.

Education Component

The City endeavors to implement a diverse education program that promulgates the storm water management requirements of the Municipal Permit. Education activities target the following groups: 1) municipal departments and personnel, 2) construction site owners and developers, 3) commercial business owners and operators, 4) industrial business owners and operators (none exist in Imperial Beach) 5) residents, general public, and school children, and 6) underserved community. Education plays an important role in facilitating the necessary behavioral change required to successfully reduce and eliminate pollutants from urban runoff.

CERTIFICATION STATEMENT

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Authorized Signatory(s)

Title

Phone No.

Date

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H. A. Levien

1.0 Introduction

1.1 Introduction

The City of Imperial Beach is required to submit its Jurisdictional Urban Runoff Management Program (JURMP) Annual Report each year by September 30th in compliance with the San Diego Regional Board Order Number R9-2007-0001 (Municipal Permit). The Annual Report contains a comprehensive description of all activities conducted by the City to meet all requirements of section D of the Municipal Permit. The reporting period for the Annual Report is the previous fiscal year July 1st to June 30th.

All components of the JURMP are represented in this report with the exception of Section 7.0, Illicit Discharge Detection and Elimination Component. The San Diego Regional Water Quality Control Board adopted Addendum No. 2 to Order No. R9-2007-0001 (Municipal Permit), which extended the annual reporting deadline associated with this component from September 30th to December 15th. This change was necessary because the program involves water quality monitoring during the dry season, defined as May 1st through September 30th, which does not allow for proper time in which to report and convey information on the dry season as a whole.

1.2 Purpose and Objectives

The purpose of the FY 2008-09 JURMP Annual Report is to provide a comprehensive account of programmatic and management activities conducted by the City of Imperial Beach to meet the requirements of the Water Quality Order No. R9-2007-0001. Additionally, the annual reporting process is used to evaluate the overall effectiveness and efficiency of program elements. The following chapters in this Annual Report discuss the measures taken by the City to meet the regulatory requirements of the Municipal Permit and demonstrates that the City has achieved substantial compliance towards reducing sources of pollutants and urban runoff to the maximum extent practicable (MEP).

2.0 DEVELOPMENT PLANNING COMPONENT

2.1 Introduction

The City endeavors to reduce pollutants and runoff from development and redevelopment projects to the maximum extent practicable (MEP). This component is primarily applicable to the Community Development Department, the Capital Improvements Projects Division, the Environmental Program Division of the Department of Public Works, and the contracted engineering firm, BDS Engineering. This section of the Annual Report discusses program implementation and changes made during FY 2008-09 to the Development Planning Component as it relates to management program activities and outcomes targeted for staff implementing control measures.

2.2 Level 1 Outcomes – Management Program Activities

2.2.1 Program Planning and Administration

The Program Planning and Administration element of the Annual Report addresses modifications to the JURMP, amendments to the General Plan, changes to development project approval and verification processes, and modification to any development project requirements. It also addresses a review and update of the program including inventories for the next fiscal year.

The City's implementation and assessment strategy for the Development Planning component is described in the *2008 JURMP Section 4.0*. During the reporting period no new changes were made to the JURMP or the program planning, administration, or assessment strategy. The updates to the General Plan made with the 2008 JURMP are still hung up and pending approval with the California Coastal Commission. All development projects underwent the appropriate environmental review and verification processes. Development and BMP inventories were maintained on record and site inspections were tracked using the City's database system HTE.

During this reporting period, the City participated in the Copermittee Workgroup responsible for establishing interim Hydromodification Management Plan criteria to be submitted to the Regional Water Quality Control Board for approval. Upon Regional Board approval of the HMP, the City will have 180 days to incorporate the requirements into the program. The HMP is currently under review.

2.2.2 Management Program Implementation

The Management Program Implementation element of the Annual Report addresses Jurisdictional requirements for project development, municipal staff training, developer education, public awareness and response, and surveys and special investigations.

The City requires all development and redevelopment projects to implement measures to reduce pollutants and runoff to the MEP. Minimum BMPs and LID requirements were established in the *2008 JURMP Section 4.0* and are required as conditions during the development review process. Priority development projects are given special consideration under the Standard Urban Stormwater Mitigation Plan (SUSMP) and have more stringent requirements. All municipal staff is knowledgeable in the storm water program and receives annual training as described in the *2008 JURMP Section 10.0*. The Community Development Department also held counter hours and face-to-face meetings throughout FY 2008-09 to provide education and answer questions for developers. In addition, every development or redevelopment project regardless of its prioritization is formally inspected for applicable BMPs throughout the duration of the project. Post construction treatment control BMPs are also inspected annually for operation and maintenance verification. An inventory of treatment control BMPs and inspection records are provided in Table 2.3.

Additional documentation, analysis, and discussion on the implementation of Management Program Activities are provided in the following tables and figures:

- Figure 2.1 presents the implementation and assessment strategy for the Development Planning Component.
- Table 2.1 provides an overview of the development and planning projects as it was implemented during FY 2008-09.
- Table 2.2 presents and describes targeted FY 2008-09 outcomes and results, as well as implementation targets for FY 2009-10.
- Table 2.3 provides the updated treatment control BMP inventory.
- Table 2.4 provides an inventory of FY 2008-09 Development Review and SUSMP projects.

2.3 Outcomes Targeted for Staff Implementing Control Measures

2.3.1 Outcome Level 2 – Knowledge and Awareness of Program Implementation by Staff and Contractors

Education is provided to the public through face-to-face interaction with City staff in meetings, through inspections, and through several local ordinances and brochures that outline the requirements for addressing urban runoff and water quality. These efforts by the City to educate the public on development planning are discussed in the *2008 JURMP Section 4.0*. The

education effort for City staff is discussed in the 2008 JURMP Section 10.0. Additional information on targeted FY 2008-09 outcomes and results is presented in Table 2.2.

2.3.2 Outcome Level 3 – Behaviors and Best Management Practice (BMP) Implementation by Staff and Developers

City staff works with developers to ensure that all development projects and redevelopment project reduce pollutants and runoff to the MEP. The 2008 JURMP Section 4.0 defines minimum BMP and LID requirements applicable to development and redevelopment in the City.

During FY 2008-09 the City continued to facilitate changes in behavior for development and redevelopment projects by reviewing and requiring conditions on projects to ensure program compliance. The City inspects active projects for violations and enforces compliance on all required conditions. All BMPs are verified for proper implementation, operation, and maintenance throughout the duration of construction. Post construction maintenance and operation of treatment control BMPs are also verified and inspected annual by the Environmental Division. Updates to treatment control BMP inventory is provided in Table 2.3.

The City is required to enforce its storm water ordinances for all Development Projects and at all development sites as necessary to maintain compliance with the Municipal Storm Water Permit. City ordinances include appropriate sanctions to achieve compliance including non-monetary penalties, fines, bonding requirements, and/or permit or occupancy denials for non-compliance.

Additional information on Behaviors and BMP Implementation by Staff and Developers is presented below in Table 2.2.

2.3.3 Outcome Level 4 – Source Load Reductions

Source load reductions from development and redevelopment projects are achieved through the implementation of BMPs and LID strategies. The City requires specific project conditions for treatment control BMPs, LIDs, and site design BMPs to reduce pollutants and runoff to the MEP. The City imposed one or more conditions of approval on 30 discretionary project applications during FY 2008-09. This includes four new “priority development projects” that will be subject to the City’s SUSMP ordinance.

Management Program Activities		Outcomes Targeted for Staff Implementing Control Measures		
Outcome Level 1a	Outcome Level 1b	Outcome Level 2	Outcome Level 3	Outcome Level 4
1.A. Program Planning and Administration	1.B. Management Program Implementation	Knowledge and Awareness	Behaviors and BMP Implementation	Source Load Reductions from Development Projects
1. FY 2008-09 Program Updates <ul style="list-style-type: none"> ▪ Modifications to JURMP ▪ Updates to program documentation ▪ Updates to training content & materials 2. Program Review and Update <ul style="list-style-type: none"> ▪ Year-end program review ▪ Updated database and inventory of treatment control BMPs 	1. Jurisdictional Requirements for Project Approval 2. Confirmation of SUSMP Requirements 3. Municipal Staff Training 4. Developer Education 5. Surveys and Special Investigations	A. Project Development Responsibilities B. Core Concepts C. Implementation Responsibilities	A. Development Activities <ul style="list-style-type: none"> ▪ Procedural and Administrative Behaviors ▪ BMP and LID implementation ▪ Illicit discharge control B. Public Service Requests <ul style="list-style-type: none"> ▪ Respond to requests 	A. Treatment control BMPs B. Runoff diversion to pervious surfaces and Site Design BMPs C. Low Impact Development (LID)

Figure 2.1 – FY 2008-09 Implementation and Assessment Strategy for the Development Planning Component

Table 2.1 – Overview of Development Planning Inventory by Development Type and Priority Classification

Category	Number	Description
A. Type of Development		
New development	1	All development projects are required to undergo the City's urban runoff approval process and meet applicable requirements. Administrative procedures for development project review is discussed in <i>2008 JURMP Section 4.0</i> .
Redevelopment	29	
B. Priority Classification		
Discretionary Projects	24	<p>No projects received a SUSMP waiver. *All SUSMP-eligible projects were subject to applicable requirements; however, no SUSMP projects were approved during this reporting period.</p> <p>Two SUSMP projects were previously approved for construction, with one of the projects (Palm Ave Street End Improvements and Storm Drain Diverter) managed by the Port of San Diego. This makes the only active SUSMP project managed by the City the North Island Credit Union Building and it finished completion at the beginning of the reporting period.</p> <p>Permits to begin construction on the other four priority development projects will not be issued until acceptable SUSMP and Water Pollution Control Plans have been submitted and approved.</p>
Priority Development (SUSMP) Projects	6*	
C. Totals		
Discretionary Projects	24	Complete list of development projects that received an environmental review during the reporting period or projects requiring a SUSMP is provided in Table 2.4.
Priority Development (SUSMP) Projects	6	
JURMP Sections	Description of FY 2008-09 Changes	
4.0 and Appendix C	No changes were made to the Development Planning Component. Updates were made to the Treatment Control BMP inventory and Development Project inventory.	

Table 2.2 – Targeted Outcomes and Results for the Development Planning Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
LEVEL 1 OUTCOMES (MANAGEMENT PROGRAM ACTIVITIES)				
A. PROGRAM PLANNING AND ADMINISTRATION				
1. FY 2008-09 PROGRAM UPDATES				
a) MODIFICATIONS TO JURMP				
Update applicable JURMP sections per Permit requirements	No updates made during FY 2008-09	Complete	Applicable updates were included in the <i>2008 JURMP Section 4.0</i> . The City is still in the process of updating Model SUSMP and Hydro Modification Plan (HMP).	Make changes in accordance to Model SUSMP and HMP
b) UPDATES TO PROGRAM DOCUMENTATION (POLICIES, PLANS, PROCEDURES, GUIDELINES, AND FORMS)				
Update program documentation for consistency with program updates	No updates made during FY 2008-09	Under review	No program policies, plans, procedures, guidelines, or forms were updated this reporting period. The City is currently looking into updating its Environmental Review forms (7-A and 7-B) and updating guidance documents for developers.	Incorporate changes from Model SUSMP and HMP
c) UPDATES TO TRAINING PROGRAM				
Update training materials for consistency with <i>2008 JURMP Section 10.0</i>	Made updates to Community Development survey	Under review	The City makes annual updates to the municipal training content and materials so that each education activity provides appropriate information for the target audience. The City endeavors to keep education activities exciting, fun, and informative.	Update training materials for consistency with <i>2008 JURMP Section 10.0</i>
2. FY 2008-09 PROGRAM REVIEW AND UPDATE				
a) YEAR-END PROGRAM REVIEW				
Complete annual	Review underway	In progress	An annual program review for the Development Planning	Complete annual

Table 2.2 – Targeted Outcomes and Results for the Development Planning Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
year-end program review			Component is underway during the development of this JURMP Annual Report. The City continues to improve the implementation of the JURMP by conducting an annual review of each component and incorporating any modifications into the next reporting period.	year-end program review
b) INVENTORY FOR DEVELOPMENT AND REDEVELOPMENT PROJECTS				
Update development and redevelopment inventory	Updates made throughout the reporting period	Complete	The City maintains a database of active development projects and development review status on the City's database software HTE. Annual inventories are also maintained in excel with the Environmental Division of the Department of Public Works.	Update development and redevelopment inventory
c) INVENTORY FOR APPROVED TREATMENT CONTROL BMPS AND MAINTENANCE				
Update inventory for treatment control BMPS	Updates made and maintenance verified through inspections	Made updates to property owners and contact information for O&M of BMPS	The Environmental Division maintains an inventory of treatment control BMPS. During this reporting period there were changes made to property owners and operation and maintenance of the BMPS. Annual verification is necessary to ensure the O&M of the BMPS.	Update inventory and maintenance for treatment control BMPS
B. MANAGEMENT PROGRAM IMPLEMENTATION				
1. Jurisdictional Requirements for Project Approval				
Require projects to implement BMPS	BMPS are required as conditions for development projects	Complete	All development and redevelopment projects are required to implement measures to reduce pollutants and runoff to the MEP. The City's project review process further requires that any new construction or modification with a valuation more than \$50,000 be subject to public improvements. Projects that meet the \$50,000 criterion are routed from the Community Development Department to the Public Works Department for a review in regard to storm water and runoff.	Condition projects with appropriate BMPS prior to permit approval
2. Confirmation of Priority Development (SUSMP) Requirements				

Table 2.2 – Targeted Outcomes and Results for the Development Planning Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
Verify that SUSMP-eligible projects are subject to applicable requirements and that BMPs are implemented and verified through inspections	All SUSMP-eligible projects were held to full SUSMP requirements	Verification confirmed	<p>Six SUSMP high priority projects were subject to applicable requirements, with only two in active construction phase during this reporting period. One project was the Palm Ave Street End Improvement and Storm Drain Diverter Project, which fell under the Port of San Diego's jurisdiction for project management. The City of Imperial Beach still provided daily oversight on the project and enforced SUSMP requirements.</p> <p>The second project was the construction of the new North Island Credit Union building. Construction on the project finished at the beginning of this reporting period and the Environmental Division confirmed the installation of the pre-conditioned treatment control BMPs for the storm drains on the property.</p>	Verify that SUSMP-eligible projects are subject to applicable requirements and that BMPs are implemented and verified through inspections
3. Municipal Staff Training				
Provide municipal staff training for FY 2008-09	Training provided to Community Development Department 9/23/08 and Public Works Department 9/17/08	Complete	<p>Training was conducted on 9/23/08 for the Community Development Department (Planning Division, Building Division, Code Compliance Division, and Redevelopment Division) and Public Works Department 9/17/08 on the necessary elements of the storm water program. A survey was also provided to establish a baseline of knowledge.</p> <p>Daily interaction with City staff ensures that storm water pollution prevention remains a high priority throughout the City.</p>	Provide municipal staff training for FY 2009-10
4. Developer Education				
Provide education for developers	Counters hours held and meetings conducted throughout the reporting period	Confirmation of developer education from Community Development	The Community Development Department held counter hours, face-to-face meetings, project review meetings, and performed inspections throughout the reporting period.	Provide developer education for FY 2009-10
5. Surveys and Special Investigations				

Table 2.2 – Targeted Outcomes and Results for the Development Planning Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
Not targeted or assessed	---	---	Special investigations were not conducted in FY 2008-09, and are not routinely conducted as part of the implementation strategy for this program element.	Not targeted
Provide a survey to municipal staff	Administered a survey to municipal staff as part of annual training program	Complete	Training was conducted on 9/23/08 for the Community Development Department and 9/17/08 for the Public Works Department on the necessary elements of this component. A survey was provided to establish a baseline of knowledge. The City incorporates surveys or pre and post tests into training programs and administers them when appropriate.	Survey municipal staff to ascertain baseline knowledge of storm water program
LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY STAFF AND CONTRACTORS)				
Establish a baseline of staff knowledge regarding applicable program content	Performed a survey on 9/23/08 of Community Development and 9/17/08 of Public Works Department as part of annual training.	Survey consisted of a 16 question test. The results are as follows: Community Development Department (12 surveys completed) and average score 89%. Public Works Department (23 surveys completed) and average score 81%.	Training was conducted on 9/23/08 for the Community Development Department and 9/17/08 for the Public Works Department on the necessary elements of this component. The survey administered during the training session provides a baseline of knowledge of core concepts and helps in refining the municipal training program for the next reporting period. The City incorporates surveys or pre and post tests into training programs and administers them when appropriate. Results from this reporting period indicate that the Community Development Department has a greater level of knowledge on core concepts of the storm water program than the Department of Public Works. The overall results still show a high level of knowledge on core storm water management concepts in the City.	Survey municipal staff to assess knowledge of storm water program
Not Targeted	Community Development Department	---	The Community Development Department held counter hours and face-to-face meetings throughout FY 2008-09 to provide education and answer questions for developers. Inspects of BMPs at project	Not Targeted

Table 2.2 – Targeted Outcomes and Results for the Development Planning Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
	provided education opportunities for developers		sites by Code Enforcement, Building Division, and Public Works also provides additional education. Surveys were not conducted in FY 2008-09, and are not routinely conducted as part of the implementation strategy for this program element. Changes in knowledge of contractors are evident by the increased level of compliance observed during inspections.	
LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY STAFF AND DEVELOPERS)				
A. DEVELOPMENT ACTIVITIES				
1. Procedural and Administrative Behaviors				
July 1, 2008 through June 30, 2009				
Review projects and prescribe necessary conditions of approval	30 projects reviewed for conditions of approval	Complete	The City reviews all proposed projects and ensures that all necessary conditions and BMPs are met.	Review projects prior to approval and issuance of permits
Inspect projects for BMP compliance	12 Projects, including the two active SUSMP Projects, were inspected daily by the Public Works Inspector	Complete	The Building Division, Code Enforcement, Environmental Division, and Public Works Inspector conduct inspections at all active development projects for compliance of minimum BMPs. The Public Works Inspector conducts inspections at all CIP and active SUSMP projects daily. The Building Inspector conducts inspections of all Discretionary permit projects and ensures the implementation of BMPs. Code Enforcement and Environmental Division respond to all reports of storm water violations from development projects. Construction inspections of Discretionary Projects are covered in the next Section of this Annual Report.	Inspect projects

Table 2.2 – Targeted Outcomes and Results for the Development Planning Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
2. BMP Implementation, Operation and Maintenance				
July 1, 2008 through June 30, 2009				
Inspect projects and verify BMP implementation	30 projects reviewed and received conditions All active projects inspected for BMPs	Complete	The Department of Public Works reviews and requires conditions on all Discretionary Projects greater than \$50,000 in costs. Once a project becomes active the City inspects and verifies that all BMPs are implemented. The Public Works Inspector also provides continual oversight during project management of CIP projects.	Review projects for appropriate BMPs and verify implementation through inspections
Verify operation and maintenance of treatment control BMPs	15 out of 16 treatment control BMPs inspected	Complete	The City annually verifies operation and maintenance of treatment control BMPs to ensure compliance with program. All high priority treatment control BMPs are inspected for operation and maintenance annually.	Verify operation and maintenance of treatment control BMPs
3. Illicit Discharge Control				
July 1, 2008 through June 30, 2009				
Inspect development projects and respond to illicit discharges	All active projects inspected 10 verbal warnings	Complete	The City inspects and enforces storm water ordinances at all development projects. The City responds to all illicit discharge reports.	Inspect projects during development phase
B. PUBLIC SERVICE REQUESTS				
Respond to all development planning requests and illegal discharge reports	30 projects reviewed 10 illegal discharge reports from construction sites	Complete	The City tracks public service requests for construction activities. Requests include project reviews and illegal discharge reports. The Environmental Division investigates all illicit discharges that are reported by the storm water hotline, City staff, or from the online reporting form.	Respond to all development planning requests

Table 2.2 – Targeted Outcomes and Results for the Development Planning Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM NEW DEVELOPMENT AND REDEVELOPMENT PROJECTS)				
A. TREATMENT CONTROL BMPS				
Not targeted	1 new treatment control BMPS installed as a project condition 16 treatment control BMPS are monitored for operation and maintenance by the City	Complete	The City requires the installation of treatment control BMP devices for projects which are deemed necessary. Load reductions are tracked when available. Table 2.3 provides the inventory, inspection records, and source loads of treatment control BMPS.	Track operation and maintenance of treatment control BMPS
B. RUNOFF DIVERSION AND SITE DESIGN BMPS				
Not Targeted	30 projects required to divert or relocate site features	Complete	The City requires the diversion of runoff from development projects to pervious areas. When runoff diversion is not feasible then a treatment control BMP is necessary. Load reductions are not typically tracked.	Not targeted
C. LOW IMPACT DEVELOPMENT (LID) BMPS				
Not targeted	30 projects required LID BMPS	Complete	During the project review the City requires LID BMPS for high priority projects. Load reductions are not tracked for LID BMPS.	Not targeted

Table 2.3 – Post Construction Treatment Control BMP Inventory and Inspection Record

ID	Address/Location		Priority	HU	Date of Installation	Responsible for Maintenance	Date of City Inspection	Service Conducted			Volume/ Weight of Debris Removed (cf or lbs)
								Date of Service	Cleaned	Booms Replaced	
IRIS1	1450 Iris Ave	Back parking lot	Low	911.11	6/27/05	Imperial Beach Property Management		Monthly 4/21/09	X	X	4 lbs
11thST1	861 11th St	Driveway approach	Med	910.20	6/1/07	HOA	4/9/09				
TLE1	741 Palm Ave	Back vehicle storage area	High	910.20	6/1/05	Property Owner	10/27/08 4/8/09	3/1/09	X	X	
13ST1	1372 13 th St	Back Parking lot drain	Med	910.20	10/1/08	Property Manager	10/1/08 4/8/09	3/1/09	X		60cf
PALM1	481 Palm Ave	Front parking and back sediment filter	Med	910.20	11/1/08	Property Manager	11/1/08 4/9/09	11/1/08	X	X	
IBP1	836 Palm Ave	Parking lot	High	910.20	5/1/02	Property Manager	10/29/08	11/1/08 3/1/09	X X	X X	
IBP2	836 Palm Ave	North corner parking lot	High	910.20	5/1/02	Property Manager	10/29/08	11/1/08	X X	X X	
IBP3	836 Palm Ave	Entrance at 8 th St	High	910.20	5/1/02	Property Manager	10/29/08	11/1/08	X X	X X	
IBP4	836 Palm Ave	Loading area	High	910.20	5/1/02	Property Manager	10/29/08	11/1/08	X X	X X	
IBP5	836 Palm	Southeast Corner of lot	High	910.20	5/1/02	Property Manager	10/29/08	11/1/08	X	X	

Table 2.3 – Post Construction Treatment Control BMP Inventory and Inspection Record

ID	Address/Location		Priority	HU	Date of Installation	Responsible for Maintenance	Date of City Inspection	Service Conducted			Volume/ Weight of Debris Removed (cf or lbs)
								Date of Service	Cleaned	Booms Replaced	
	Ave								X	X	
IBP6	836 Palm Ave	Northeast corner of lot	High	910.20	5/1/02	Property Manager	10/29/08	11/1/08	X X	X X	
13SM1	1126 13 th St	North front entrance	Med	911.11	5/1/05	Property Owner	10/27/08 4/9/09	4/20/09	X	X	
13SM2	1126 13 th St	South front entrance	Med	911.11	5/1/05	Property Owner	10/27/08 4/9/09	4/20/09	X	X	
13SM3	1126 13 th St	North back parking lot	Med	911.11	5/1/05	Property Owner	10/27/08 4/9/09	4/20/09	X	X	
13SM4	1126 13 th St	South back parking lot	Med	911.11	5/1/05	Property Owner	10/27/08 4/9/09	4/20/09	X	X	
NICU1	1101 Palm Ave	Back parking lot and planter box	Med	910.20	9/1/08	Property Owner	4/9/09	9/1/08		X	

Table 2.4 – Development Review and SUSMP Project Inventory FY 2008-09

ID	File No.	SUSMP	Project Status	Address 1	Project Type	Description	Divert Hot Water/Roof Runoff to Landscape or Pervious	Relocate Features to Drain Runoff into Landscaped Area	Permanent Post-Construction BMP Needed	Storm Drain Improvements (Treatment Device)	Minimize/Maintain Existing Amount of Impervious Area	Remove Under Sidewalk Drain	Install Grease Trap / Interceptor	Post-construction BMP Maintenance Assurance	Construction / Post-construction BMP Notification	Loamy soil to minimize runoff	Water Pollution Control Plan
1	MF 881	Yes	Active	1101 Palm Ave	New Building	North Island Credit Union building			X				X	X	X		X
2	D03-102	Yes	Active	Palm Ave street end	Other	Palm Ave improvements and storm drain diverter			X					X	X		X
3	CIP MF 950	Yes	Planning	495 10th St	CIP	Public Works yard expansion											X
4	MF 962	Yes	Under Review	400 7th Street	SFR	New SFR behind existing SFR	X	X	X		X			X	X	X	X
5	MF 779	Yes	Under Review	221-225 Palm Ave	Building add.	8 unit residential and commercial	X	X			X			X	X	X	X
6	MF 1003	Yes	Under Review	853 Emory St	Demolition/ new construction	demolition and const of new church	X		X	X	X			X	X		X
7	CIP S08-101	No	Active	Seacoast Drive	CIP	South Seacoast Drive Overlay											X
8	CIP W05-104	No	Active	501 Elm	CIP	Pump Station 3 Upgrade											X
9	MF 984	No		137 Ebony	2- unit condo Conversion	conversion of existing condo	X				X			X	X	X	
10	No MF	No		624 12th street	Low Mod complex	Conv app to low mod complex	X				X			X	X	X	
11	CIP F05-204	No	Active	825 Imperial Beach Blvd	CIP	Fire Station Door Replacement											X
12	MF 987	No		1534-1548 Seacoast Drive	Revetment Maintenance	Repair maintenance of seawall and revetment								X	X		
13	No MF	No		624 12th St	Conversion	App to low-mod complex	X	X			X						
14	MF 986	No		535 7th St	SFR	Teo new SFR	X				X			X	X	X	
15	CIP F05-201	No	Active	825 Imperial Beach Blvd	CIP	City Hall Council Chambers Renovations											X
16	CIP F05-203	No	Active	825 Imperial Beach Blvd	CIP	City Emergency Power Replacement and Upgrade											X
17	CIP P05-601	No	Active	Reama Park	CIP	Reama Park Master Plan											X
18	CIP P06-101	No	Active	Teeple Park	CIP	Teeple Park Master Plan											X
19	CIP P08-701	No	Active	Sports Park	CIP	Sports Park Rec Center Master Plan											X
20	MF 990	No		602 7th Street	SFR	single family residentail	X	X			X			X	X	X	
21	MF 989	No		1233 California St	Building add.	single family residentail	X		X	X	X			X	X	X	
22	MF 992	No		1497 13th St	Wireless communication facility	New wireless communication facility	X				X			X	X	X	
23	MF 994	No		762 Georgia St	2 unit condo conversion	Convert two houses to condominiums	X				X			X	X	X	
24	CIP S07-102	No	Active	City Streets	CIP	CIP Slurry Seal on road											X
25	MF 1000	No		710 Seacost Dr	New roof	new roof over 2nd floor patio	X	X				X					
26	No MF	No		347 Evergreen Ave	New addition and remodel	1-story addition and kitchen remodel	X				X			X	X	X	
27	MF 1006	No		181-183 Ebony	Condo Conversion	Conversion of two residential to condo units	X				X			X	X	X	
28	No MF (City SD)	No		1344 Palm	New Car Wash (City of SD)	Convert empty lot to a new car wash on City of SD property								X	X		
29	MF 1010	No		1245 East Lane	SFR	SFR remodel	X	X			X			X	X		
30	R04-201	No	Active	100-300 Palm Ave	CIP	Old Palm Ave Steet Scape Improvements											X

3.0 CONSTRUCTION COMPONENT

3.1 Introduction

The City endeavors to reduce pollutants and runoff from construction sites to the MEP. This component is primarily applicable to the Community Development Department and the requirements that apply to the Building and Planning Division activities related to construction and construction permits, and compliance actions proposed by the City. The Environmental Division of the Public Works Department facilitates the implementation of the construction requirements of the Municipal Permit. This section of the Annual Report discusses program implementation and changes made during FY 2008-09 to the Construction Component as it relates to management program activities and outcomes targeted for staff implementing control measures.

3.2 Level 1 Outcomes – Management Program Activities

3.2.1 Program Planning and Administration

The Program Planning and Administration element of the Annual Report addresses modifications to the JURMP, updates to local ordinances, program documentation, training content, and materials. It also addresses a review and update of the program including inventories for the next fiscal year.

The City's implementation and assessment strategy for the Construction Component is described in the *JURMP Section 5.0*. During FY 2008-09 no new updates were made to the municipal code or the program planning and administration processes. The last updates to the municipal code were made in February 2008 and included amendments to Chapter 8.30 "Urban Runoff Management and Discharge Control", Chapter 8.32 "Standard Urban Stormwater Mitigation Plan (SUSMP)", and Chapter 15.54 "Grading Permits and Plans". Amendments were submitted to the Regional Board as part of the *2008 JURMP Appendix B and C*.

The City maintains an ongoing database of active construction projects and tracks inspections through the City's database software HTE. A more detailed description of the City's inspection frequency, tracking, and verification process is provided in the *2008 JURMP Section 5.0*.

Figure 3.1 presents the implementation and assessment strategy for the Construction Component as it was implemented during FY 2008-09. Table 3.2 provides a complete overview of targeted FY 2008-09 outcomes and results, as well as implementation targets for FY 2009-2010.

3.2.2 Management Program Implementation

The Management Program Implementation element of the Annual Report addresses Jurisdictional requirements for construction sites, training of municipal staff and contractors, inspections, public awareness and response, and surveys and special investigations.

The City requires all development and redevelopment projects, including Capital Improvement Projects (CIP), to reduce pollutants and runoff to the MEP through the implementation of BMPs. The designated minimum BMPs for construction projects are listed in the *2008 JURMP Section 5.0* and are required as project conditions prior to the approval and issuance of local construction and grading permits. Construction projects receive a prioritization ranking of high, medium, or low based on the criteria of City form 7-A. Construction projects receive the necessary frequency of BMP inspections once building permits are assigned and construction begins. During the rainy season high priority projects are inspected at least biweekly, medium priority sites are inspected at least monthly, and low priority projects are inspected as needed. During the dry season, all construction sites receive inspections as needed. The following tables and figures below provide additional information on the implementation and assessment of the Management Program Activities for the Construction Component:

- Table 3.1 provides an overview of the construction projects as it was implemented during FY 2008-09.
- Figure 3.1 presents the implementation and assessment strategy for the Construction Component.
- Table 3.2 presents and describes targeted FY 2008-09 outcomes and results, as well as implementation targets for FY 2009-10.
- Table 3.3 Construction permit inventory and inspection frequency

3.3 Outcomes Targeted for Staff Implementing Control Measures

3.3.1 Outcome Level 2 – Knowledge and Awareness

Education is provided to the public through face-to-face interaction with City staff in meetings, workshops, community presentations, inspections, and through several local ordinances and brochures that outlines the requirements for addressing urban runoff and water quality. These efforts by the City to educate the public on construction are discussed in the *JURMP Section 5.0*. The education effort for City staff is discussed in the *JURMP Section 10.0*.

3.3.2 Outcome Level 3 – Behaviors and Best Management Practice (BMP) Implementation

The City facilitates changes in behavior and implementation of BMPs at construction sites by working with developers to ensure that all projects meet the requirements of the Regional Permit. Prior to the issuance of construction and grading permits the City requires developers to submit design plans that reduce pollutants and runoff to the MEP, develop a Project Storm Water Management Plan, and obtain coverage if necessary under the State Water Resources Control Board's General Construction Permit. The City also inspects projects and enforces storm water ordinances at all construction sites. The *2008 JURMP Section 5.0* provides more information on the procedural and administrative mechanisms in the City that promote behavioral changes. The *2008 JURMP Appendix D* defines minimum BMP requirements applicable to construction in the City. Additional information is presented below in Table 3.2 on the targeted outcomes and results for changes in behavior and BMP implementation as they were implemented in FY 2008-09.

3.3.3 Outcome Level 4 – Source Load Reductions

The primary goal of BMP implementation is to reduce the loading of pollutants and runoff to storm water discharges. During FY 2008-09 the City successfully implemented all program requirements that relate to the Construction Component of the Regional Permit. Source load reductions were achieved at construction sites by implementing erosion and sediment control, requiring minimum BMPs, and enforcing general site management requirements. The City required 41 active construction projects and 10 Capital Improvement Projects to reduce pollutants and runoff to the MEP. Compliance with required minimum BMPs were then verified through 233 site inspections.

Management Program Activities		Outcomes Targeted for Staff Implementing Control Measures		
Outcome Level 1a	Outcome Level 1b	Outcome Level 2	Outcome Level 3	Outcome Level 4
1.A. Program Planning and Administration	1.B. Management Program Implementation	Knowledge and Awareness	Behaviors and BMP Implementation	Source Load Reductions from Construction Projects
1. FY 2008-09 Program Updates <ul style="list-style-type: none"> ▪ Modifications to JURMP ▪ Updates to program documentation ▪ Updates to training content & materials 2. Program Review and Update <ul style="list-style-type: none"> ▪ Year-end program review ▪ Updated watershed-based inventory of construction sites 	1. Jurisdictional Requirements for Project Approval 2. Construction Project Urban Runoff Approval Process 3. Municipal Staff Training 4. Contractor Education 5. Construction Site Inspections 6. Surveys and Special Investigations	A. Construction Responsibilities B. Core Concepts C. Implementation Responsibilities	A. Construction Activities <ul style="list-style-type: none"> ▪ Procedural and Administrative Behaviors ▪ BMP implementation ▪ Illicit discharge control B. Public Service Requests <ul style="list-style-type: none"> ▪ Response to requests 	A. General site management requirements B. Erosion and sediment controls C. Designated minimum BMPs D. Additional controls for CWA Section 303(d) waters

Figure 3.1 – FY 2008-09 Implementation and Assessment Strategy for the Construction Component

Table 3.1 – Overview of Construction Inventory by Priority Classification

Category	Number	Description
A. Type of Construction		
Construction Projects	40	
Capital Improvement Projects (CIP)	10	
Priority Development (SUSMP) Projects	1	
B. Priority Classification		
High Priority Projects	1	High priority projects are determined by City 7-A form and generally consist of new building construction projects or SUSMP projects. Most development projects in the City are categorized as low priority.
Medium Priority Projects	1	
Low Priority Projects	49	
C. Totals		
Construction Projects	50	*The City had two active SUSMP projects during the reporting period. However, one of the projects, Palm Ave Street End Improvements and Storm Drain Diverter, was along the waterfront and managed by the Port of San Diego. The only active SUSMP project was the North Island Credit Union Building and it finished completion at the beginning of the reporting period.
Priority Development (SUSMP) Projects	2*	
JURMP Sections	Description of FY 2008-09 Changes	
5.0 and Appendix D	BMP requirements of the JURMP applicable to construction were modified in accordance with the requirements of the updated Permit in March 2008. No additional changes were made during this reporting period.	

Table 3.2 – Targeted Outcomes and Results for the Construction Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
LEVEL 1 OUTCOMES (MANAGEMENT PROGRAM ACTIVITIES)				
A. PROGRAM PLANNING AND ADMINISTRATION				
1. FY 2008-09 PROGRAM UPDATES				
a) MODIFICATIONS TO JURMP				
Update applicable JURMP sections per new Permit requirements	No updates made during FY 2008-09	Complete	Applicable updates were included in <i>JURMP Section 5.0</i> , submitted to the RWQCB on 03-24-08.	Make an necessary updates to the JURMP
b) UPDATES TO PROGRAM DOCUMENTATION (POLICIES, PLANS, PROCEDURES, GUIDELINES, AND FORMS)				
---	---	---	No program policies, plans, procedures, guidelines, or forms were updated during the reporting period. The City previously updated its ordinance and associated environmental review forms last reporting period.	Update program documentation for consistency with program updates
c) UPDATES TO TRAINING PROGRAM				
---	---	---	<i>JURMP Section 10.0</i> establishes updated standards for training municipal staff. The City makes annual updates to the municipal training content and materials so that each education activity provides appropriate information for the target audience.	Update staff training materials for consistency with JURMP
2. FY 2008-09 PROGRAM REVIEW AND UPDATE				
a) YEAR-END PROGRAM REVIEW				
Complete annual year-end program review	Review underway	In progress	An annual program review for the Construction Component is underway during the development of this JURMP Annual Report. The City continues to improve the implementation of the JURMP by conducting an annual review of each component and incorporating	Complete annual year-end program review

Table 3.2 – Targeted Outcomes and Results for the Construction Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
			any modifications into the next reporting period.	
b) DEVELOP INVENTORY FOR CONSTRUCTION PROJECTS AND SITE INSPECTIONS				
Develop an inventory of construction projects	Inventory developed	Complete	An inventory of construction projects and inspections is maintained on the City's database software HTE. Construction site inspection records are also maintained on HTE. The Environmental Division also maintains an inventory of construction projects that require conditions from Public Works. An inventory of Capital Improvement Projects (CIP) is also maintained by the Environmental Division.	Update construction project inventory
B. MANAGEMENT PROGRAM IMPLEMENTATION				
1. Jurisdictional Requirements for Project Approval				
Require projects to implement BMPs	Construction BMPs are required as conditions for development projects	Complete	All development and redevelopment projects are required to implement measures to reduce pollutants and runoff to the MEP. Designated minimum BMPs for construction projects are listed in the <i>2008 JURMP Section 5.0</i> .	Condition projects with appropriate BMPs prior to permit approval
2. Construction Project Urban Runoff Approval Process				
Require construction projects to have adequate project review for storm water and pollution control	All construction projects received the necessary project review before being issued City permits	Complete	Prior to the issuance of construction and grading permits the City requires developers to submit design plans that reduce pollutants and runoff to the MEP, develop a Project Storm Water Management Plan, and obtain coverage if necessary under the State Water Resources Control Board's General Construction Permit. Construction projects with costs greater than \$50,000 are channeled through Public Works Department and required to implement public improvements before approval. Information on the City's project review and approval process is provided in the <i>2008 JURMP Section 4.0</i> and in the previous chapter of this report.	Require construction projects to have adequate project review for storm water and pollution control
3. Municipal Staff Training				

Table 3.2 – Targeted Outcomes and Results for the Construction Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
Provide training for FY 2008-09	Training provided to Community Development Department 9/23/08 and Public Works Department 9/17/08	Complete	Training was conducted on 9/23/08 for the Community Development Department (Planning Division, Building Division, Code Compliance Division, and Redevelopment Division) and Public Works Department 9/17/08 on the necessary elements of this component. A survey was also provided to establish a baseline of knowledge. Three staff members from Community Development and two staff members from Public Works also attended a half day workshop on the new Model SUSMP on 6/1/09.	Provide training to all staff with identified responsibilities
4. Construction Contractor Education				
Provide education for contractors	Counter hours held and meetings conducted throughout reporting period	Complete	The Community Development Department held counter hours, face-to-face meetings, project review meetings, and performed inspections throughout the reporting period. Public Works Department oversaw storm water compliance for the Capital Improvement Projects and provided education to contractors during meetings and inspections.	Provide contractor education for FY 2009-10
5. Construction Inspections				
Inspect construction activities	The Building Inspector made 58 inspections for BMP compliance at construction sites; and the Public Works Inspector made 175 inspections for BMP compliance at CIP projects.	Complete	All construction projects get formally inspected throughout the duration of the project. During the rainy season, all high priority sites are inspected at least biweekly, medium priority sites are inspected at least monthly, and low priority sites are inspected as needed. During the dry season, all construction sites are inspected as needed. The Public Works Department inspects all active CIP projects sites daily, and Discretionary Projects, which are not CIP, receive inspections by the Community Development Department Building Inspector as required by the Permit.	Inspect construction sites based on priority of site

Table 3.2 – Targeted Outcomes and Results for the Construction Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
6. Surveys and Special Investigations				
Not targeted or assessed	---	---	Special investigations were not conducted in FY 2008-09, and are not routinely conducted as part of the implementation strategy for this program element.	Not targeted
Establish a baseline of staff knowledge regarding applicable program content	Performed a survey on 9/23/08 of Community Development and 9/17/08 of Public Works Department as part of annual training.	Complete	Training was conducted on 9/23/08 for the Community Development Department and 9/17/08 for the Public Works Department on the necessary elements of this component. A survey was also provided to establish a baseline of knowledge. The City incorporates surveys or pre and post tests into training programs and administers them when appropriate.	Survey staff to ascertain baseline levels of storm water program
LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY STAFF AND CONTRACTORS)				
Establish a baseline of staff knowledge regarding applicable program content	Performed a survey on 9/23/08 of Community Development and 9/17/08 of Public Works Department as part of annual training.	Survey consisted of a 16 question test. The results are as follows: Community Development Department (12 surveys completed) and average score 89%. Public Works Department (23 surveys completed) and average score 81%.	Training was conducted on 9/23/08 for the Community Development Department and 9/17/08 for the Public Works Department on the necessary elements of this component. The survey administered during the training session provides a baseline of knowledge of core concepts and helps in refining the municipal training program for the next reporting period. The City incorporates surveys or pre and post tests into training programs and administers them when appropriate. Results from this reporting period indicate that the Community Development Department has a greater level of knowledge on core concepts of the storm water program than the Department of Public Works. The overall results still show a high level of knowledge on core storm water management concepts in the City.	Survey staff and assess results to refine training program

Table 3.2 – Targeted Outcomes and Results for the Construction Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
Not targeted	Community Development and Public Works Departments provide education opportunities for contractors	---	The Community Development Department held counter hours and face-to-face meetings throughout FY 2008-09 to provide education and answer questions for contractors. The Public Works Department also held pre construction meetings and provided construction management throughout the duration of all CIP projects. Inspects of BMPs at project sites by Code Enforcement, Building Division, and Public Works Inspector also provided additional opportunities for education. Surveys were not conducted in FY 2008-09, and are not routinely conducted as part of the implementation strategy for this program element.	Not targeted
LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY STAFF AND CONTRACTORS)				
A. CONSTRUCTION ACTIVITIES				
1. Procedural and Administrative Behaviors				
July 1, 2008 through June 30, 2009				
Review projects and prescribe necessary conditions of approval	All constructions projects (51 projects) reviewed for conditions of approval before getting notice to proceed with construction activities	Complete	The City reviews and conditions all proposed projects to ensure all necessary conditions and BMPs are met before any construction permits are issued. Once a City permit is issued then the project is in active construction phase and receives applicable inspections for BMP compliance.	Review projects prior to approval and issuance of permits
2. BMP Implementation				
July 1, 2008 through June 30, 2009				
Inspect projects and verify BMPs	The Building Division conducted	Complete	The City inspects and verifies BMPs at all projects to ensure compliance with program. The Building Inspector, Public Works	Inspect projects and verify BMPs

Table 3.2 – Targeted Outcomes and Results for the Construction Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
	58 BMP site inspections. The Public Works Inspector provided daily oversight at all CIP construction sites and performed 175 BMP inspections.		Inspector, Code Enforcement Officer, and Environmental Division share the responsibility of inspecting development projects and verifying BMP compliance.	
3. Illicit Discharge Control				
July 1, 2008 through June 30, 2009				
Inspect active construction projects and respond to illicit discharges	Total of 233 construction site inspections were made during the reporting period. Responded to 10 reports of illegal discharges from construction activities	Complete	The City inspects projects and enforces storm water ordinances at all construction sites. The City responds to all illicit discharges.	Inspect projects during construction phase and respond to illicit discharges
B. PUBLIC SERVICE REQUESTS				
Respond to all construction requests and illegal discharge reports	All active construction projects (51 projects) were reviewed for Permit requirements. The City responded	Complete	The City tracks public service requests for construction activities. Requests include project reviews and illegal discharge reports. The Environmental Division investigates all illicit discharges that are reported by the storm water hotline, City staff, or from the online reporting form. Most construction related discharges are from private residences and not active construction sites. (i.e. washing paint brushes, landscaping, or power washing). Only One illicit discharge was from an active construction site requiring a City	Respond to all construction requests

Table 3.2 – Targeted Outcomes and Results for the Construction Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
	to 10 reports of illegal discharges from construction activities.		permit.	
LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM CONSTRUCTION PROJECTS)				
A. GENERAL SITE MANAGEMENT REQUIREMENTS				
Not targeted	51 projects required to implement BMPs	---	The City requires construction sites to reduce discharges of pollutants to the MEP, and to prevent discharges from causing or contributing to a violation of water quality standards. Source load reductions from BMPs are not tracked.	Not targeted
B. EROSION AND SEDIMENT CONTROLS				
Not targeted	12 projects required installation of erosion and sediment control BMPs	---	The City requires installation of erosion and sediment control BMPs. Load reductions are not tracked.	Not targeted
C. DESIGNATED MINIMUM BMPS				
Not targeted	51 projects required to implement designated minimum BMPs	---	The City requires designated minimum BMPs for all construction projects. Load reductions are not tracked.	Not targeted
D. ADDITIONAL CONTROLS FOR CWA SECTION 303(D) WATERS				
Not targeted	0 projects required to implement additional controls for CWA Section	---	The City requires additional controls to be implemented for Clean Water Act (CWA) Section 303(d) waters. Load reductions are not tracked.	Not targeted

Table 3.2 – Targeted Outcomes and Results for the Construction Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
	303(d) waters			

Table 3.3 –FY 2008-09 Active Construction Inventory and Inspection Frequency

Permit or File No.	Priority (High, Medium, Low)	Period of Time (# Weeks) Site Active During Rainy Season (October - April)	Total Number of Inspections Rainy Season	Total Number of Inspections Dry Season	Total Number of Inspections	Address	General Results of Inspections / CIP Project Discription	Number of Violations / Enforcement Action Type (VW, NOV, NOA)
382	Low	27	1	1	2	132 IMPERIAL BEACH	BMP SEDIMENT CONTROL	VW
329	Low	19	1	-	1	163 ELDER	BMP SEDIMENT CONTROL	-
447	Low	27	2	-	2	177 CARNATION	BMP SEDIMENT CONTROL	-
303	Low	2	-	1	1	220 EVERGREEN	BMP SEDIMENT CONTROL	-
261	Low	10	1	-	1	235 DAHLIA	BMP SEDIMENT CONTROL	-
380	Low	25	2	-	2	319 IMPERIAL BEACH	BMP SEDIMENT CONTROL	VW
68	Low	0	-	1	1	347 EVERGREEN	BMP SEDIMENT CONTROL	-
230	Low	0	-	1	1	414 ELM	BMP SEDIMENT CONTROL	-
69	Low	27	2	1	3	419 CARNATION	BMP SEDIMENT CONTROL	-
169	Low	27	-	1	1	458 CHERRY	BMP SEDIMENT CONTROL	VW
277	Low	0	-	1	1	545 11TH	BMP SEDIMENT CONTROL	-
277	Low	1	-	1	1	548 CALLA	BMP SEDIMENT CONTROL	-
130	Low	27	-	1	1	549 DAHLIA	BMP SEDIMENT CONTROL	-
245	Low	7	1	-	1	605 FLORENCE	BMP SEDIMENT CONTROL	-
293	Low	27	-	1	1	624 12TH	BMP SEDIMENT CONTROL	-
323	Low	0	-	1	1	634 OCEAN	BMP SEDIMENT CONTROL	-
173	Low	0	-	2	2	646 ALABAMA	BMP SEDIMENT CONTROL	-
233	Low	27	-	1	1	705 3RD	BMP SEDIMENT CONTROL	-
460	Low	16	1	-	1	729 5TH	BMP SEDIMENT CONTROL	-
339	Low	5	-	1	1	742 5TH	BMP SEDIMENT CONTROL	-
394	Low	27	-	2	2	754 HICKORY	BMP SEDIMENT CONTROL	VW
346	Low	27	-	1	1	811 CORVINA	BMP SEDIMENT CONTROL	-
156	Low	27	-	2	2	815 ENCINA	BMP SEDIMENT CONTROL	-
348	Low	3	-	1	1	821 12TH	BMP SEDIMENT CONTROL	VW
371	Low	27	-	1	1	861 10TH	BMP SEDIMENT CONTROL	-
113	Low	1	-	2	2	933 EMORY	BMP SEDIMENT CONTROL	-
222	Low	0	-	2	2	970 ARRIBA AVENIDA	BMP SEDIMENT CONTROL	-
216	Low	27	1	1	2	975 IRIS	BMP SEDIMENT CONTROL	-
179	Low	22	1	-	1	995 8TH	BMP SEDIMENT CONTROL	-
101	Low	25	-	2	2	1016 12TH	BMP SEDIMENT CONTROL	-
391	Low	20	2	-	2	1121 LOUDEN	BMP SEDIMENT CONTROL	-
355	Low	8	1	-	1	1130 FLORIDA	BMP SEDIMENT CONTROL	-
339	Low	4	1	-	1	1173 GROVE	BMP SEDIMENT CONTROL	-
3	Low	0	-	1	1	1174 EMORY	BMP SEDIMENT CONTROL	-
142	Low	27	-	1	1	1231 PALM	BMP SEDIMENT CONTROL	-
443	Low	6	2	-	1	1233 CALIFORNIA	BMP MATERIAL DLVRY / STORAGE	VW
278	Low	4	-	2	2	1244 GRANGER	BMP SEDIMENT CONTROL	VW
341	Low	25	-	1	1	1277 14TH	BMP SEDIMENT CONTROL	-
228	Low	0	-	2	2	1420 10TH	BMP SEDIMENT CONTROL	-
270	Low	3	-	1	1	1610 SEACOAST	BMP SEDIMENT CONTROL	-
MF-881	High	0	-	3	3	1101 PALM	SUSMP BMP	-
Public Works Capital Improvement Projects								
CIP	Med	4	18	45	63	100-300 PALM	BMP Old Palm Ave Steet Scape Improvements	-
CIP	Low	0	-	13	13	825 Imperial Beach Blvd	BMP City Hall Council Chambers Renovations	-
CIP	Low	0	-	13	13	825 Imperial Beach Blvd	BMP City Emergency Power Upgrade	-
CIP	Low	0	-	14	14	825 Imperial Beach Blvd	BMP Fire Station Door Replacement	-
CIP	Low	0	-	12	12	Reama Park	BMP Reama Park Master Plan	-
CIP	Low	0	-	12	12	Teeple Park	BMP Teeple Park Master Plan	-
CIP	Low	0	-	12	12	Sports Park	BMP Sports Park Rec Center Master Plan	-
CIP	Low	0	-	10	10	City Streets	BMP CIP Slurry Seal on road	-
CIP	Low	0	-	13	13	Seacoast Drive	BMP South Seacoast Drive Overlay	-
CIP	Low	0	-	13	13	501 Elm	BMP Pump Station 3 Upgrade	-

4.0 MUNICIPAL COMPONENT

4.1 Introduction

The City endeavors to reduce or eliminate pollutants and runoff from municipal discharges to the MEP. This component is primarily applicable to the Department of Public Works and its efforts to prevent municipal discharges from causing or contributing to a violation of water quality standards. This section of the Annual Report discusses program implementation and changes made during FY 2008-09 to the Municipal Component as it relates to management program activities and outcomes targeted for staff implementing control measures.

4.2 Level 1 Outcomes – Management Program Activities

4.2.1 Program Planning and Administration

The Program Planning and Administration element of the Annual Report addresses modifications to the JURMP, updates to program documentation, training content, and materials. It also addresses a review and update of the program including inventories for the next fiscal year.

The City's implementation and assessment strategy for the municipal component is described in the *2008 JURMP Section 6.0*. The *JURMP Appendix E* defines minimum BMP requirements applicable to streets, roads, highways, municipal areas, and parking facilities in the City. BMPs applicable to these facilities were updated as part of the City's *2008 JURMP*, submitted on March 24, 2008. During FY 2008-09 no updates were determined necessary to the minimum BMP requirements.

During FY 2008-09 the City expanded the municipal training program to include pre and post tests as part of the effectiveness assessment. The City also updated its municipal facility and activity list, adding Serenity Gardens to the inventory. Table 4.4 provides the updated municipal facility and activity list and Figure 4.1 presents the implementation and assessment strategy for the major elements of the Municipal Component as it was implemented during FY 2008-09.

4.2.2 Management Program Implementation

The Management Program Implementation element of the Annual Report addresses Jurisdictional requirements, municipal staff training, municipal facility inspections, public awareness and response, and surveys and special investigations.

The City makes storm water pollution prevention and response a high priority for all Public Works employees. Each Public Works vehicle contains a binder of municipal storm water BMPs and contains a map of the entire MS4 system. The Environmental Division conducts annual training for all Public Works employees and daily interactions with staff ensures that storm water pollution prevention remains a high priority throughout the City. The Public Works Department is

the eyes and ears on the streets and therefore the first line of defense for pollution prevention, response, and cleanup. The 2008 *JURMP Section 6.0* provides a complete description of the management programs for the Municipal Component.

Routine maintenance and cleaning of municipal facilities keeps accumulated debris and other potential pollutants from entering the MS4. The City conducts formal inspections of all high priority municipal facilities and activates. All other municipal facilities get inspected as need. Inspection records for FY 2008-09 are provided in Table 4-4. The City also maintains a number of storm drain inlet filters that are cleaned and maintained quarterly by Downstream Services, Inc. Cleaning records are maintained on file and logged in a database on the Environmental Division server. The municipal storm drain filter inventory and maintenance record is provided in Table 4-3. During FY 2008-09 the one additional municipal storm drain inlet filter for a total of 13 now currently maintained by the City.

During FY 2008-09 the City completed work on the Palm Avenue street end improvement and low-flow storm drain diverter. The storm drain diverter project, which was funded by a Clean Beach Initiative grant, has the capacity to divert up to 250 gallons per minute of urban runoff into the sanitary sewer. The City now has two major storm drain diverters along the water front (Date Ave street end and Palm Ave street end).

The City continued operation of its storm water hotline and online citizen requests form. All public correspondence either online, phone or personal communication is tracked on the Environmental Division server.

Table 4.1 presents an overview of the municipal inventory by facility type. Table 4-2 presents and describes details on targeted FY 2008-09 outcomes and results, as well as implementation targets for FY 2009-10. Additional documentation, analysis, and discussion are provided in Figure 4.2, and Tables 4.3 and 4.4.

4.3 Outcomes Targeted for Staff Implementing Control Measures

4.3.1 Outcome Level 2 – Knowledge and Awareness

The City conducts annual training for all municipal employees. Training for the Municipal Component is specifically targeted at the Public Works Department because City Streets, Maintenance Workers, and Sewer crews are typically the first line of defense for storm water pollution. The training program focuses on the use of Best Management Practices in daily operations, and is designed to create an overall sensitivity to pollution prevention concerns. Open discussions are encouraged to further the importance and enhance the program. This education effort is discussed in the *JURMP Section 10.0*.

4.3.2 Outcome Level 3 – Behaviors and Best Management Practice (BMP) Implementation

The City implements minimum BMPs for all municipal activities as described in the *JURMP Appendix E*. Major targeted outcomes for FY 2008-09 included streets and parking lot sweeping, MS4 cleaning, sewer system preventative maintenance, integrated pest management at parks, and implementation of municipal facility BMPs. Additional information on how BMPs were implemented is presented below in Table 4.2.

4.3.3 Outcome Level 4 – Source Load Reductions

The City continues to make impressive source load reductions from municipal facilities and activities. The City maintained approximately 125 miles of curbed streets and uncurbed roads located throughout the City. Approximately 206 tons of trash and debris were collected through street sweeping operations. The City also collected 174 loads of large bulky items illegally dumped in City alleys through its franchise waste hauler EDCO. The annual City-wide Home Front Clean Up event also collected another 154 tons of waste debris.

The Sewer Division also did an outstanding job of cleaning and inspecting the MS4 system and is on track to clean 100 percent of the City's storm drain lines and catch basins for 2009. Approximately five miles of underground piping, 117 catch basins and inlets, and seven open drainage facilities get cleaned between the months of May through October. During this reporting period a total of 4,130 pounds of trash, sediment, and organic matter was collected out of the MS4 system. Figure 4.3 provides the amount of debris collected out of the MS4 broken down by fiscal year.

Lastly, over 30 acres of park facilities, athletic fields, beach accesses, landscapes at various facilities, and five community parks located throughout the City were maintained during FY 2008-09. The City has a dedicated Tidelands crew that picks up trash and debris and conducts landscaping duties 7 days a week on the beach and one block inland of the beach. In addition, the City contract with Donovan Prison for a weekly crew to pick up trash and conducts landscape duties at City parks and unmaintained areas.

Table 4.2 provides a breakdown of the source load reductions for FY 2008-09 from municipal facilities and activities.

Management Program Activities		Outcomes Targeted for Staff Implementing Control Measures		
Outcome Level 1a	Outcome Level 1b	Outcome Level 2	Outcome Level 3	Outcome Level 4
1.A. Program Planning and Administration	1.B. Management Program Implementation	Knowledge and Awareness	Behaviors and BMP Implementation	Source Load Reductions from Municipal Facilities
<p>1. FY 2008-09 Program Updates</p> <ul style="list-style-type: none"> ▪ Modifications to JURMP ▪ Updates to program documentation ▪ Updates to training content & materials <p>2. Program Review and Update</p> <ul style="list-style-type: none"> ▪ Year-end program review ▪ Updated municipal inventory 	<p>1. Jurisdictional Requirements for Municipal Areas and Activities</p> <p>2. Municipal Staff Training</p> <p>3. Maintenance Inspections</p> <p>4. Stormwater Hot Line Operation (619-424-4095)</p> <p>5. Surveys and Special Investigations</p>	<p>A. Illicit Discharge Reporting Responsibilities <i>Not targeted or assessed</i></p> <p>B. Core Concepts for Municipal Staff</p> <p>C. Implementation Responsibilities <i>Not targeted or assessed</i></p>	<p>A. Preventative Maintenance of Sanitary and Storm Sewer Systems</p> <ul style="list-style-type: none"> ▪ Improved streets, roads, highway, and parking ▪ MS4 ▪ Sanitary Sewer <p>B. Municipal Facilities and Maintenance Activities</p> <ul style="list-style-type: none"> ▪ BMP implementation <p>C. Public Service Requests</p> <ul style="list-style-type: none"> ▪ Response to requests <p>D. Municipal Storm Drain Filters and Urban Runoff Diversion</p>	<p>A. Debris Removal (Sweeping Activities)</p> <p>B. Debris Removal (Non-sweeping Activities)</p>

Figure 4.1 – FY 2008-09 Implementation and Assessment Strategy for the Municipal Component

Table 4.1 – Overview of Municipal Inventory by Facility Type and Priority Classification

Category	Miles	Number	Description of Changes
A. Type of Facility			
Paved Roads	127.9	---	
Unpaved Roads	---	---	
Municipal Parking Facilities	---	4	
Underground storm drain piping	5	---	
Catch basins/Inlets	---	117	
Open Drainage Facilities	---	7	
B. Priority Classification			
<u>Streets, Roads, and Highways</u>			The City also contains 13.3 miles of paved alleys and 2.5 miles of unimproved alleys that are not on the municipal inventory. The alleys are not owned by the City and are maintained by the property owners. The City conducts monthly street sweeping on the paved alleys and provides pick up of large bulky items illegally dumped in the alleys.
High (Commercial areas)	19.2	---	
Medium (Beachfront residential areas)	9.6	---	
Low (Other residential areas and paved alleys)	99.1	---	
<u>Municipal Parking Facilities</u>			
High (Commercial)		4	
Medium (N/A)	---	---	
Low (N/A)	---	---	
<u>MS4 Facilities</u>			
Underground piping	5	---	

Table 4.1 – Overview of Municipal Inventory by Facility Type and Priority Classification

Category	Miles	Number	Description of Changes
Catch basins/Inlets	---	117	
Open Drainage Facilities	---	7	
<u>Sanitary Sewer System</u>			
Pump stations		12	
Underground piping	39.5		
C. Totals			
Streets, Roads, and Highways	127.9	---	
Unpaved Roads	---	---	
Municipal Parking Facilities	---	4	
Underground Piping	5	---	
Catch Basins/Inlets	---	117	
Open Drainage Facilities	---	7	
Sanitary Sewer Pump Stations		12	
Underground Sewer Pipe	39.5		
JURMP Sections	Description of FY 2008-09 Changes		
6.0 and Appendix E	BMP requirements of the JURMP applicable to streets, roads, highways, and municipal parking facilities were modified in accordance with the requirements of the updated Permit in March 2008. The City made updates to its municipal inventory list adding Serenity Gardens. City made updates to the municipal inspection form.		

Table 4.2 – Targeted Outcomes and Results for the Municipal Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
LEVEL 1 OUTCOMES (MANAGEMENT PROGRAM ACTIVITIES)				
A. PROGRAM PLANNING AND ADMINISTRATION				
1. FY 2008-09 PROGRAM UPDATES				
a) MODIFICATIONS TO JURMP				
Update applicable JURMP sections per Permit requirements	No updates were made during FY 2008-09	Complete	Applicable updates were included in <i>JURMP Section 6.0</i> . No significant updates are expected to be necessary during this permit cycle.	Not targeted
b) UPDATES TO PROGRAM DOCUMENTATION (POLICIES, PLANS, PROCEDURES, GUIDELINES, AND FORMS)				
Update program documentation for consistency with program updates	Updates made to the Municipal Inspection Forms	Complete	The City updated its Municipal Inspection Forms. The City created three new municipal inspection forms: 1. General Municipal Inspection Form, 2. Municipal Parks Inspection Form, 3. Public Works Yard Inspection Form. This reporting period was the first year inspection forms were used.	Make updates to program documentation as needed
c) UPDATES TO TRAINING PROGRAM				
Update training materials for consistency with 2008 <i>JURMP Section 10.0</i>	Made updates to municipal survey	Under review	The City makes annual updates to the municipal training content and materials so that each education activity provides appropriate information for the target audience.	Update training materials for consistency with 2008 <i>JURMP Section 10.0</i>
2. FY 2008-09 PROGRAM REVIEW AND UPDATE				
a) YEAR-END PROGRAM REVIEW				
Complete annual year-end program	Review underway	In progress	An annual program review for the Municipal Component is underway during the development of this JURMP Annual Report.	Complete annual year-end program

Table 4.2 – Targeted Outcomes and Results for the Municipal Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
review			The City continues to improve the implementation of the JURMP by conducting an annual review of each component and incorporating any modifications into the next reporting period.	review
b) UPDATES MUNICIPAL INVENTORIES				
Update municipal inventory	Made updates to municipal facilities and activities inventory by adding Serenity Gardens to the inventory.	Complete	The City made updates to the municipal facilities and activities inventory by adding Serenity Gardens to the inventory list. Serenity Gardens was accidentally omitted from the inventory list last reporting period because of its small size.	Update municipal inventory
B. MANAGEMENT PROGRAM IMPLEMENTATION				
1. Jurisdictional Requirements for Municipal Areas and Activities				
Require municipal areas and activities to implement minimum BMPs	Requirements implemented	Complete	Specific minimum BMP requirements for municipal facilities and activities, including pollution prevention methods, are described in the <i>2008 JURMP Appendix E</i> . Municipal BMPs are reviewed regularly and updated as necessary. In addition, each City vehicle contains a binder of Best Management Practices for Public Works activities. The binder is a reference tool for employees to properly implement BMPs for specific job tasks and a reference for responding to illegal discharges.	Implement minimum BMPs for municipal areas and activities
2. Municipal Staff Training				
Provide training for FY 2008-09	Training provided to Community Development Department 9/23/08 and Public Works Department 9/17/08 and during municipal	Complete	Training was conducted on 9/23/08 for the Community Development Department (Planning Division, Building Division, Code Compliance Division, and Redevelopment Division) and Public Works Department 9/17/08 on the necessary elements of the storm water program. A survey was also provided to establish a baseline of knowledge. Training is also provided to Division supervisors during municipal	Provide municipal staff training for FY 2009-10

Table 4.2 – Targeted Outcomes and Results for the Municipal Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
	inspections		inspections. Daily interaction with City staff ensures that storm water pollution prevention remains a high priority throughout the City.	
3. Maintenance Inspections				
Inspect road, parking facilities, storm drains, and other municipal areas and activities	Inspections done annually	Complete	All City-maintained roads, parking facilities, and storm drains are formally inspected annually. Other municipal areas and activities not identified as high priority are inspected as needed. Inspections include a review of activities and practices, review and inspection of site BMPs, and a review of the overall effectiveness of the BMPs. Inspection records are provided in Table 4.3.	Inspect municipal facilities
Identify any MS4 facility found to require inspection less than annually	Review underway	In progress	The City endeavors to inspect and clean 100% of the accessible portions of the underground storm drain system. The City recognizes that in some years this goal may not be possible. For this reason the City is currently reviewing and identifying portions of the MS4 that collect high volumes of trash and debris in order to prioritize the maintenance and cleaning of the storm drain system.	Inspect and clean MS4
4. Storm Water Hotline Operation				
Operate a hotline to provide the public opportunities to report illegal storm water discharges	Hotline operated throughout reporting period	In progress	A Storm Water Hotline (619-424-4095) was operated throughout FY 2008-09 to provide the public a means of reporting illegal storm water discharges or report accumulated trash and debris in City-maintained roadways. 174 reports of trash and debris and 95 illegal storm water complaints were received during the reporting period by residents and municipal staff. See Level 4 Outcomes (below).	Operate a hotline to provide the public opportunities to report illegal storm water discharges
5. Surveys and Special Projects				
Provide a survey to municipal staff	Administered a survey to municipal staff as part of annual training	Complete	Training was conducted on 9/23/08 for the Community Development Department and 9/17/08 for the Public Works Department on the necessary elements of this component. A survey was provided to establish a baseline of knowledge. The City	Survey municipal staff to ascertain baseline knowledge of storm water

Table 4.2 – Targeted Outcomes and Results for the Municipal Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
	program		incorporates surveys or pre and post tests into training programs and administers them when appropriate.	program
Implement special projects that go beyond minimum JURMP requirements	Finished completion of Palm Ave low-flow urban runoff diverter project. Installed one new storm drain treatment control filter at Sports Park.	Projects complete	The City finished completion of the Palm Ave low-flow urban runoff diverter, which diverts up to 250 gallons per minute of urban runoff into the sanitary sewer. The City also added another storm drain inlet filter at the IB Sports Park for a total of 13 municipal storm drain filters maintained by the City. Storm drain filter inventory and maintenance records are provided in Table 4.3.	Not targeted
Implement special projects that go beyond minimum JURMP requirements	Completed first phase of the City Hall and Fire Department xeriscaping project	In progress	The City is xeriscaping 6,500 square feet of landscape area in front of City Hall and Fire Department. The first phase of the project in front of the Fire Station was completed during this reporting period. The second phase of the project will be completed during the beginning of next FY. This project involved public participation with two Boy Scout Eagle Projects contributing to the project.	Not targeted
LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY STAFF AND CONTRACTORS)				
Establish a baseline of staff knowledge regarding applicable program content	Performed a survey on 9/23/08 of Community Development and 9/17/08 of Public Works Department as part of annual training.	Survey consisted of a 16 question test. The results are as follows: Community Development Department (12 surveys completed) and average score 89%. Public Works Department (23	Training was conducted on 9/23/08 for the Community Development Department and 9/17/08 for the Public Works Department on the necessary elements of this component. The survey administered during the training session provides a baseline of knowledge of core concepts and helps in refining the municipal training program for the next reporting period. The City incorporates surveys or pre and post tests into training programs and administers them when appropriate. Results from this reporting period indicate that the Community Development Department has a greater level of knowledge on core concepts of the storm water program than the Department of Public Works. The overall results still show a high level of knowledge on	Survey municipal staff to assess knowledge of storm water program

Table 4.2 – Targeted Outcomes and Results for the Municipal Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
		surveys completed) and average score 81%.	core storm water management concepts in the City.	
LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY STAFF AND CONTRACTORS)				
A. PREVENTATIVE MAINTENANCE OF SANITARY AND STORM SEWER SYSTEMS				
1. Improved Streets, Roads, Highways, and Parking Facilities				
July 1, 2008 through June 30, 2009				
Sweep all High trash areas at least twice per month	28.7 curb-miles swept at least twice per month and 4 municipal parking facilities are swept weekly	Complete	Commercial areas (19.2 miles of curbed roads and 4 parking lots) are swept weekly. Beachfront residential areas (9.5 miles of curbed roads) are swept bi-weekly (high trash and debris).	Sweep all High trash areas at least twice per month
Sweep all Moderate trash areas at least monthly	99.1 curb-miles swept at least monthly	Complete	All other areas (99.1 curb miles) are considered moderate priority and are swept on a monthly basis.	Sweep all Moderate trash at least monthly
Sweep all Low trash areas at least once (0)	N/A	N/A		Sweep all Low trash areas at least once
Sweep improved streets, roads, and highways	127.9 curb-miles swept (2,392 total miles) swept)	Complete		Sweep at least the total minimum number of curb-miles required to meet Permit-prescribed frequencies for all improved streets

Table 4.2 – Targeted Outcomes and Results for the Municipal Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
2. Municipal Separate Storm Sewer System (MS4)				
July 1, 2008 through June 30, 2009				
Clean accumulations of trash and debris greater than 33% of design capacity	117 catch basins inspected	Complete	Storm drain cleaning generally occurs between the months of May and August. In this annual report we provide analysis for the specified reporting period (July 1 st – June 30 th), which includes records of both the 2008 and 2009 cleaning events for this annual report. It is important to note that the City inspects all of its 117 catch basins and cleans them if necessary on an annual basis. The City also endeavors to clean 100% of the 5 miles of storm drain lines annually.	Clean accumulations of trash and debris greater than 33% of design capacity
Inspect and clean MS4 line	Approximately 5 miles of storm drain lines cleaned and inspected	Complete	City endeavors to clean 100% of the 5 miles of storm drain lines annually. During 2008 the Sewer Division cleaned 100% of the MS4. The Sewer Division is on track to do the same for 2009. The Sewer Division uses its vactor truck to jet and clean accumulated debris out of the storm drain.	Clean accumulations of trash and debris greater than 33% of design capacity
Following two years of inspections, any MS4 facility that requires inspection and cleaning less than annually may be inspected as needed, but not less than every other year	Review underway	In progress	The Environmental Division is performing a review of past storm drain line cleaning records to identify areas of high trash and debris accumulation. Sections of the MS4 that are identified as low trash and debris accumulation areas may be cleaned and inspected less than annually.	Inspect MS4 facilities not listed as high priority as needed, but not less than every other year.

Table 4.2 – Targeted Outcomes and Results for the Municipal Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
3. Sewer System Maintenance and Spill Prevention				
July 1, 2008 through June 30, 2009				
Prevent and eliminate infiltration from the sanitary sewer to the MS4	36 miles of sanitary sewer system inspected	Complete	The City has conducted a sewer capacity study and identified areas needing improvement. These will be undertaken through the Capital Improvement Projects program. A Sewer System Management Plan was also completed in accordance with Waste Discharge Requirements.	Inspect sanitary sewer system for leaks to MS4
Conduct routine maintenance on sanitary sewer system	36 miles of sanitary sewer system maintained	Complete	Most sanitary sewer pipelines are cleaned at least annually, and known problem areas are cleaned more frequently. Twelve alarmed sewage pump stations are monitored daily.	Conduct routine maintenance on and cleaning of sanitary sewer system to prevent spills and discharges to MS4
4. Management of Pesticides, Herbicides, and Fertilizers				
July 1, 2008 through June 30, 2009				
Implement BMPs to reduce the contribution of pollutants to MS4	Requirements implemented	Complete	The City limits the application of pesticides and herbicides in accordance with Integrated Pest Management Program policy.	Implement IPM BMPs
B. MUNICIPAL FACILITIES AND MAINTENANCE ACTIVITIES				
Implement minimum BMPs at municipal facilities and activities	Minimum BMPs implemented	Complete	The City enforces compliance of minimum BMPs at all municipal facilities and maintenance activities. All City vehicles contain a binder on BMPs for Public Works activities. Implementation of BMPs are verified during annual inspections and get reinforced through daily interactions.	Implement minimum BMPs
C. PUBLIC SERVICE REQUESTS				

Table 4.2 – Targeted Outcomes and Results for the Municipal Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
Respond to all road service requests received	N/A	N/A	The City does not currently track public service requests for road maintenance activities.	Respond to all road service requests received
Respond to all sewer spills received and log in appropriate data bases	6 sewer spills reported	Completed	In the event of a sewer spill, City staff follows procedures laid out in its Sanitary Sewer Overflow Response Plan. All but one sewer spill during FY 08-09 were from private laterals. The exception is from a spill occurring from Imperial Beach Pier.	Respond to and report all sewer spills received
D. MUNICIPAL STORM DRAIN INSERTS AND STORM WATER DIVERSIONS				
Maintain municipal treatment control devices	Maintenance implemented for the 10 th St interceptor	Complete	The City maintains a vortech storm water interceptor at the intersection of 10 th St and Imperial Beach Blvd. The system was installed in December 2002 and is designed to remove sediment, floating hydrocarbons, and debris from storm water during all levels of flow. The City inspects the 10 th St interceptor at least quarterly.	Maintain municipal treatment control devices
Maintain municipal storm drain filters	Maintenance implemented for 13 municipal storm drain filters	Complete	The City voluntarily installed storm drain inlet filters at 13 municipal locations. During this reporting period the City added one additional storm drain filter insert at the Imperial Beach Sports Park. Each filter is designed to capture sediment, hydrocarbons, trash, and debris. The filters are inspected and maintained quarterly by contract service. Table 4.3 provides the inventory and cleaning records for the municipal storm drain inserts.	Maintain municipal storm drain filters
Maintain urban runoff diverters	Palm Ave street end low-flow urban runoff diverter became operational January 5, 2009; City continued operation of the Date Ave street end diverter	Complete	The City finished completion of the Palm Ave street end low-flow urban runoff diverter on January 5, 2009. The City now operates two low-flow urban runoff diverters along the beach front. Both diverters have the capacity to divert up to 250 GPM into the sanitary sewer.	Maintain urban runoff diverters

Table 4.2 – Targeted Outcomes and Results for the Municipal Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM THE MUNICIPALITY INCLUDING THE MS4)				
A. DEBRIS REMOVAL (SWEEPING ACTIVITIES)				
Not targeted	206 tons of trash and debris removed through sweeping of streets, roads, highways, and municipal parking facilities	---	The amounts of debris collected are highly variable from year to year, as shown in Figure 4.2. Therefore, even though the overall yield of debris from sweeping this year was a little higher, this should not be interpreted as a trend. The City will continue to monitor results over a longer period, but believes its existing resources and schedules are properly allocated.	Not targeted
B. REMOVAL (NON-SWEEPING ACTIVITIES)				
Not targeted	Collect trash and debris along City-maintained roads; EDCO collected 174 loads of bulky items illegally dumped in alleys	---	The City has a dedicated Tidelands Maintenance Division, funded by the Port of San Diego, whose mission is to keep the beach and one block inland from the beach free of trash, sand, and other debris. The City also maintains a contract with Donavan Correctional Facility to provide supervised labor for various needs including landscaping and trash pickup. In addition the City has a contract with EDCO to collect items illegally discarded in City alleys. Finally, the Streets and Parks Divisions play a crucial role in keeping the City free of trash. At this time it is not part of the City to track this element of trash and debris along City-maintained roads.	Not targeted
Clean accumulations of trash and debris in the MS4 greater than 33% of design capacity	4,130 pounds of trash, debris and organic matter removed from MS4		There are approximately 117 catch basins and inlets that are inspected annually, and, if necessary, are cleaned if trash is observed. The amounts of debris collected are highly variable from year to year, as shown in Figure 4.3, and may be attributed to the estimation process used. Therefore, even though the overall yield of debris from cleaning this year was considerably reduced, this should not be interpreted as a trend. The City will continue to monitor results over a longer period, but believes its existing	Clean accumulations of trash and debris in the MS4 greater than 33% of design capacity

Table 4.2 – Targeted Outcomes and Results for the Municipal Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
			resources and schedules are properly allocated, and has made efforts to improve the estimation process.	
Divert urban low-flow runoff	192,000 gallons of urban runoff was diverted to the sanitary sewer during the first 6 months of operation of the Palm Ave diverter	In progress	The City conducted weekly post construction monitoring for bacteria and tracked diverted flow at the Palm Ave diverter. During the first 6 months 192,000 gallons of urban runoff was diverted to the sanitary sewer and prevented from flowing to the Pacific. Weekly bacterial analysis also revealed elevated levels of bacteria in the diverted flows. Using AB411 monitoring action levels, 85% of the samples were in exceedance of enterococcus and 100% of the samples were in exceedance of total coliform bacteria.	Continue operation of the Palm Ave and Date Ave storm drain diverters

Figure 4.2 – Street Sweeping Totals

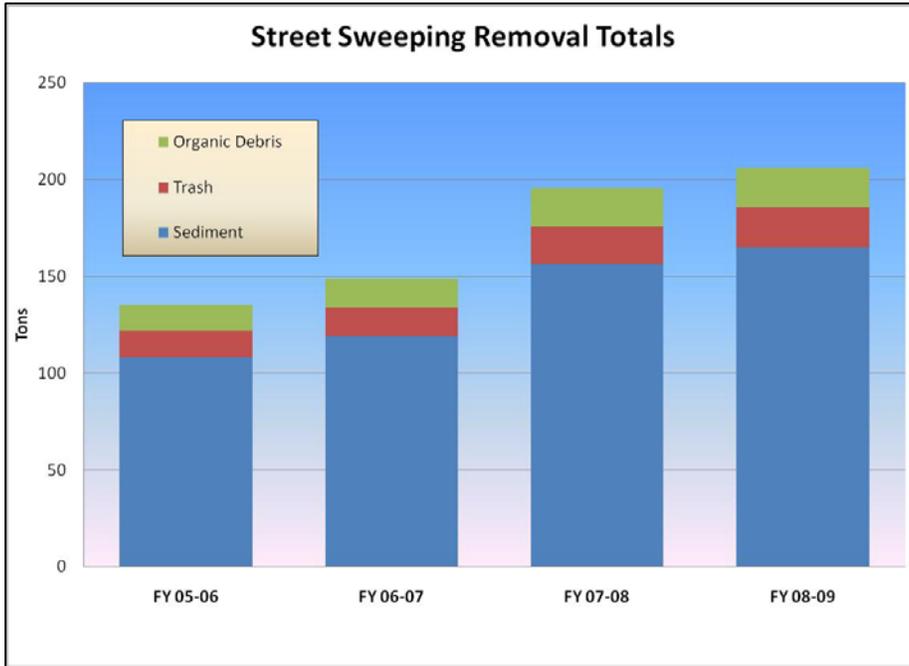


Figure 4.3 – MS4 Cleaning Totals

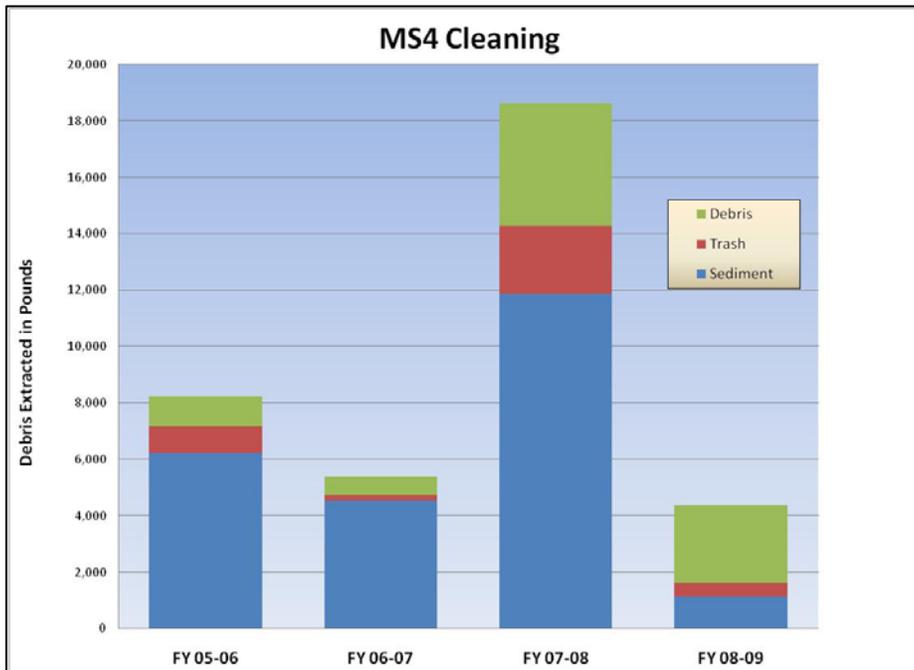


Figure 4.3- The MS4 cleaning totals presented above provide totals by fiscal year. It is important to note that the City endeavors to clean 100% of the MS4 between the months of May-October; therefore, this figure is not a true representation of the amount removed during an annual cleaning cycle. FY 07-08 also includes a channel cleaning event, which explains the unusually high totals.

Table 4-3 – Municipal Storm Drain Filter Inventory and Maintenance Records

ID	Filter Type	Address / Location	Watershed	Date of Installation	Date of Service	Service Conducted			Weight of Debris	Materials Collected (lbs.)			Volume Used
						Inspected	Cleaned	Boom(s) Replaced	Removed (lbs.)	Sed	Trash	Org	%
SDF1	Grate Inlet Skimmer Box 18" X 18" Bio-sorb oil absorbing polymers for hydrocarbon removal	495 Tenth St. Public Works Yard (Back of yard)	910.20	13-Oct-03	24-Sep-08	X	X	X	2	X	-	X	5%
					8-Dec-08	X	X	X	5	X	-	X	15%
					16-Mar-09	X	X	X	20	X	-	X	20%
					9-Jun-09	X	X	-	2	X	-	X	10%
SDF2	Grate Inlet Skimmer Box - Round 24" X 24" Bio-sorb oil absorbing polymers for hydrocarbon removal	495 Tenth St. Public Works Yard (Front Parking Area)	910.20	13-Oct-03	24-Sep-08	X	X	-	0.5	X	-	X	3%
					8-Dec-08	X	X	-	2	X	-	X	5%
					16-Mar-09	X	X	X	10	X	-	X	15%
					9-Jun-09	X	X	X	4	X	-	X	10%
SDF3	Grate Inlet Skimmer Box 24" X 36" Bio-sorb oil absorbing polymers for hydrocarbon removal	825 Imperial Beach Blvd. City Hall	911.11	13-Oct-03	24-Sep-08	X	na	na	2	X	-	X	29%
					8-Dec-08	X	na	na	25	X	-	X	25%
					16-Mar-09	X	X	X	40	X	-	X	20%
					9-Jun-09	X	X	-	6	X	-	X	10%
SDF4	Grate Inlet Skimmer Box 12" X 12" Bio-sorb oil absorbing polymers for hydrocarbon removal	865 Imperial Beach Blvd. Fire Station	911.11	13-Oct-03	24-Sep-08	X	X	X	2	X	-	-	15%
					8-Dec-08	X	X	-	0	-	-	-	0%
					16-Mar-09	X	X	X	0.2	X	X	X	1%
					9-Jun-09	X	X	-	0.4	X	X	X	2%
SDF5	Grate Inlet Skimmer Box 24" X 30" Bio-sorb oil absorbing polymers for hydrocarbon removal	8th St. / Marina Vista Marina Vista Center	911.11	13-Jan-03	24-Sep-08	X	X	X	9	-	-	X	5%
					8-Dec-08	X	X	X	25	-	-	X	50%
					16-Mar-09	X	X	X	4	X	-	X	10%
					8-Jun-09	X	X		5	X	-	X	30%

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ID	Filter Type	Address / Location	Watershed	Date of Installation	Date of Service	Service Conducted			Weight of Debris	Materials Collected (lbs.)			Volume Used
						Inspected	Cleaned	Boom(s) Replaced	Removed (lbs.)	Sed	Trash	Org	%
SDF6	Grate Inlet Skimmer Box 24" X 36" Bio-sorb oil absorbing polymers for hydrocarbon removal	Seacoast Dr. / Palm Ave. City Parking Lot	910.10	13-Jan-03	3-Jul-08	X	na	na	0	na	na	na	0%
					24-Sep-08	X	na	na	0	na	na	na	0%
					8-Dec-08	X	na	na	0	na	na	na	0%
					16-Mar-09	X	na	na	0	na	na	na	0%
					8-Jun-09	X	X	X	30	X	X	X	25%
SDF7	Pipe Skimmer 24" X 24" Bio-sorb oil absorbing polymers for hydrocarbon removal	Hemlock Ave. / 15th St. City Easement	911.11	12-Jan-05	3-Jul-08	X	na	na	0	na	na	na	0%
					24-Sep-08	X	X		0.8	X	X	-	1%
					8-Dec-08	X	-	-	0	-	-	-	0%
					16-Mar-09	X	X	-	0.125	X	X	X	0%
					9-Jun-09	X	-	-	0.1	X	X	X	0%
SDF8	KriStar, Flo Gard Plus Catch Basin Insert 18" X 36" Hydrocarbon absorption boom	839 10 St. City Alley East of 10 St. between Elm and Donax	910.20	3-Nov-05	3-Jul-08	X	X	-	1	X		X	5%
					24-Sep-08	X	X	X	0.5	X	X	X	3%
					8-Dec-08	X	X	-	0.5	X		X	3%
					16-Mar-09	X	X	X	6	X	X	X	10%
					9-Jun-09	X	X	-	2	X	X	X	10%
SDF9	2 Grate Inlet Skimmer Boxes 24" X 36" Hydrocarbon absorption boom	Alley abutting 8th St City Alley 100 yd South of Palm	910.20	22-Feb-07	3-Jul-08	X	X	-	0.5	X	-	-	0%
					24-Sep-08	X	X	X	1	X	X	X	6%
					8-Dec-09	X	X	-	5	X	-	X	3%
					16-Mar-09	X	X	X	12	X	X	X	15%
					8-Jun-09	X	X	-	5	X	X	X	10%

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ID	Filter Type	Address / Location	Watershed	Date of Installation	Date of Service	Service Conducted			Weight of Debris Removed (lbs.)	Materials Collected (lbs.)			Volume Used %
						Inspected	Cleaned	Boom(s) Replaced		Sed	Trash	Org	
SDF10	Grate Inlet Skimmer Box 32" X 40" Hydrocarbon absorption boom	Alley b/w 8th St. & Delaware St just South of Palm Commercial Ctr.	910.20	5-Feb-07	3-Jul-08	X	X	-	8	X	-	X	5%
					24-Sep-08	X	X	X	0.25	X	-	X	1%
					8-Dec-08	X	X	-	8	X	-	X	5%
					16-Mar-09	X	X	X	45	X	-	X	15%
					8-Jun-09	X	X	-	5	X	-	X	5%
SDF11	Grate-Inlet Box 24" X 36" Hydrocarbon absorption boom	Curb inlet at SW Corner 9th St. and Palm Ave	910.20	22-Feb-07	3-Jul-08	X	X	-	2	X	X	X	16%
					24-Sep-08	X	X	X	2	X	X	X	90%
					8-Dec-08	X	X	-	1	X	X	X	25%
					16-Mar-09	X	X	X	3	X	X	X	80%
						X	X	-	5	X	X	X	90%
SDF12	KriStar, Flo Gard Plus Catch Basin Insert	740-798 Florida Street City Alley behind apartment complex	910.20	17-May-07	3-Jul-08	X	X	-	2	X	X	X	10%
					24-Sep-08	X	X	X	3	X	X	X	15%
					8-Dec-08	X	X	-	35	X	X	X	25%
					16-Mar-09	X	X	X	60	X	X	X	40%
					8-Jun-09	X	X	-	5	X	X	X	15%
SDF13	Round Hyrdo Flow Guard Plus and hydrocarbon booms 24" Diameter Grate and 22" Diamerter Inlet	4th Street South end of parking lot at Sports Park	911.11	29-Jun-09	29-Jun-09	X	-	X	-	-	-	-	

Table 4.4 – Municipal Facility and Activity Inventory and Inspection Record

ID	Name	Inspection Date	Address	Type1	Type2	Type3	Watershed	Receiving Water	303(d) Tributary Status	ESA Status	Inspection Priority
M-1	Public Works Yard	5/14/09	495 10th Street	Office Building	Corporate Yard	Parking Lot	910.20	Otay River	No	Yes	High
M-2	Dempsey Holder Safety Center	Tidelands and Lifeguards Daily, Director yearly	950 Ocean Lane	Office Building	Corporate Yard		911.11	Pacific Ocean	Yes	Yes	High
M-3	Fire Station	5/14/2009 Env	865 Imperial Beach Boulevard	Office Building	Fire Station	Parking Lot	911.11	Tijuana Estuary	Yes	No	High
M-4	City Hall	5/14/2009 Env	825 Imperial Beach Boulevard	Office Building	Parking Lot		911.11	Tijuana Estuary	Yes	No	High
M-5	Marina Vista Center	5/20/2009 Env	1075 8th Street	Office Building	Parking Lot		911.11	Tijuana Estuary	Yes	No	Low
M-6	I.B. Boys & Girls Club	5/20/2009 Env	847 Encina Avenue	Office Building	Parking Lot		911.11	Tijuana Estuary	Yes	No	Med
M-7	Veteran's Park	5/20/2009 Env	9th Street / Imperial Beach Boulevard	Park	Parking Lot		911.11	Tijuana Estuary	Yes	No	High
M-8	Reama Park	5/20/2009 Env	Elder Avenue / Elkwood Avenue	Park	Parking Lot		911.11	Pacific Ocean	Yes	No	Med
M-9	Sports Park & Recreation Center	6/4/2009 Env	425 Imperial Beach Avenue	Park	Office Building	Parking Lot	911.11	Tijuana Estuary	Yes	No	High
M-10	Teeple Park	5/20/2009 Env	Calla Avenue / Florida Street	Park	Parking Lot		910.20	Otay River	No	No	Med
M-11	Triangle Park	5/20/2009 Env	7th Street / Palm Avenue	Park			910.20	Otay River	No	No	Med
M-12	Dunes Park	5/20/2009 Env	700 Seacoast Drive	Park	Parking Lot		910.10	Pacific Ocean	Yes	Yes	High
M-13	Pier Plaza	Tidelands Daily	Evergreen Street / Seacoast Drive	Park			911.11	Pacific Ocean	Yes	Yes	High
M-14	Imperial Beach Pier	Tidelands Daily	Evergreen Street / Seacoast Drive	Miscellaneous			N/A	Pacific Ocean	Yes	Yes	High
M-15	Beachfront	Tidelands and Lifeguards Daily	Mexican Border to YMCA Camp Surf	Miscellaneous			N/A	Pacific Ocean	Yes	Yes	Med

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ID	Name	Inspection Date	Address	Type1	Type2	Type3	Watershed	Receiving Water	303(d) Tributary Status	ESA Status	Inspection Priority
M-16	Seacoast & Palm Parking Lot	6/10/2009 Env Director also inspects yearly	Seacoast Drive & Palm Avenue	Parking Lot			910.10	Pacific Ocean	Yes	Yes	High
M-17	Elkwood Parking Lot	6/10/2009 Env Director also inspects yearly	Seacoast Drive & Elkwood Avenue	Parking Lot			911.11	Pacific Ocean	Yes	Yes	High
M-18	Underground MS4	Sewer and Enviro Div inspect and clean	Citywide	MS4			All	All	Yes	Yes	High
M-19	Pump Station #11 (Storm Drain)	Sewer Daily and Weekly Env Mang	Palm Avenue street end	MS4			910.10	Pacific Ocean	Yes	Yes	High
M-20	Underground Sewer	Sewer vactor once per year	Citywide	Sewer			All	All	Yes	Yes	High
M-21	Pump Station #1A (Underground)	Sewer Weekly Director (June)	862 Seacoast Drive	Sewer			910.10	Pacific Ocean	Yes	Yes	High
M-22	Pump Station #1B (Underground)	Sewer Weekly Director (March)	1098 Seacoast Drive	Sewer			911.11	Pacific Ocean	Yes	Yes	High
M-23	Pump Station #2 (Above ground)	Sewer Weekly Director (July)	1306 South Seacoast Drive	Sewer			911.11	Tijuana Estuary	Yes	Yes	High
M-24	Pump Station #3 (Underground)	Sewer Weekly Director (April)	501 Elm Avenue	Sewer			911.11	Tijuana Estuary	Yes	No	High
M-25	Pump Station #4 (Underground)	Sewer Weekly Director (Dec)	755 Delaware Avenue	Sewer			911.11	Tijuana Estuary	Yes	No	High
M-26	Pump Station #5 (Underground)	Sewer Weekly Director (May)	133 Dahlia Avenue	Sewer			910.10	Pacific Ocean	Yes	No	High
M-27	Pump Station #6 (Underground)	Sewer Weekly Director (Nov)	498 Rainbow Street	Sewer			910.10	San Diego Bay	Yes	No	High
M-28	Pump Station #7 (Underground)	Sewer Weekly Director (Oct)	504 Oneonta Avenue	Sewer			911.11	Tijuana Estuary	Yes	No	High

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ID	Name	Inspection Date	Address	Type1	Type2	Type3	Watershed	Receiving Water	303(d) Tributary Status	ESA Status	Inspection Priority
M-29	Pump Station #8 (Underground)	Sewer Weekly Director (Jan)	895 Imperial Beach Boulevard	Sewer			911.11	Tijuana Estuary	Yes	No	High
M-30	Pump Station #9 (Underground)	Sewer Weekly Director (August)	1025 9th Street	Sewer			911.11	Tijuana Estuary	Yes	No	High
M-31	Pump Station #10 (Above ground)	Sewer Weekly Director (Feb)	814 Cypress Avenue	Sewer			910.20	Otay River	No	No	High
M-32	Streets	Citywide inspections monthly	Citywide	Streets			All	All	Yes	Yes	High
M-33	Alleys	Citywide inspections monthly	Citywide	Streets			All	All	Yes	Yes	High
M-34	Traffic Islands	Inspected by Streets and Parks	Citywide	Streets			All	All	Yes	No	Med
M-35	Special Event Venues	Env and Tidelands for each event	Citywide	Miscellaneous			All	All	Yes	Yes	High
M-36	Graffiti Removal	Annual Training	Citywide	Miscellaneous			All	All	Yes	Yes	High
M-37	Serenity Garden	6/30/2009 Env	Silver Strand Blvd and Citrus Ave	Park			910.10	Otay River	No	No	Med

5.0 INDUSTRIAL AND COMMERCIAL COMPONENT

5.1 Introduction

The City endeavors to prevent or eliminate the discharge of pollutants and runoff from industrial and commercial sources. This component is primarily applicable to the Environmental Program Division of the Department of Public Works and its efforts to oversee compliance with urban runoff regulations at businesses within the City and reduce the discharge of pollutants to the MS4 to the maximum extent practicable (MEP). The City is tasked with educating businesses about urban runoff management and overseeing their compliance with applicable Municipal Storm Water Permit requirements. This section of the Annual Report discusses program implementation and changes made during FY 2008-09 to the Industrial and Commercial Component as it relates to management program activities and outcomes targeted for staff implementing control measures.

5.2 Level 1 Outcomes – Management Program Activities

5.2.1 Program Planning and Administration

The Program Planning and Administration element of the Annual Report addresses modifications to the JURMP, updates to program documentation, training content, and materials. It also addresses a review and update of the program including inventories for the next fiscal year.

The City's implementation and assessment strategy for the Industrial and Commercial Component is described in the *2008 JURMP Section 7.0*. During the reporting period the City made routine updates to the Commercial and Industrial business inventory. The inventory is maintained on the Environmental Division Server and identifies all industrial and commercial facilities that could contribute pollutant loads to the MS4. The City currently does not have any industrial facilities on that inventory. As of the most recent update in February 2009, the City had a total of 170 commercial and zero industrial businesses on the inventory. Records are also maintained for each specific business on inspections, corrective actions, and illegal discharges.

The City is also currently in the process of updating the stationary business inventory to match the San Diego Copermittees Standardized Regional Industrial and Commercial Inventory template. The City is collaborating with the San Diego Copermittees in the development of an online Regional Mobile Business database. Both the Standardized Regional Commercial and Industrial Inventory template and online Regional Mobile Business database will be in operation for FY 2009-10.

An overview of the City's industrial and commercial inventory and facility classification is provided in Table 5.1.

During FY 2008-09 additional updates were made to the commercial business inspection program and to the inspection education materials. The City updated its commercial inspection form and started inspecting food service businesses for fats, oils, and grease (FOG) compliance. Updates were also made to the “Best Management Practices for your Business” brochure, which is distributed during every commercial inspection.

Figure 5.1 presents the implementation and assessment strategy for the major elements of the Commercial and Industrial Component as it was implemented during FY 2008-09. Figure 5.2 provides the updated “Best Management Practices for your Business” brochure and Figure 5.3 provides the updated Commercial Inspection Form.

5.2.2 Management Program Implementation

The Management Program Implementation element of the Annual Report addresses Jurisdictional requirements, municipal training, commercial site inspections, public awareness and response, and surveys and special investigations.

The Environmental Division performs inspections at all high priority commercial businesses in the City. The City also inspects non-high priority business and mobile businesses during the year as necessary. Commercial inspection records conducted during this reporting period is provided in Table 5.3. Inspections are conducted and documented as outlined in the *2008 JURMP Section 7.0*. Annual training for City staff also addresses BMP requirements for commercial businesses. City staff is encouraged to report to the Environmental Division any illicit discharges or activities observed from businesses. The combination of inspections and observant City staff has contributed to the high success of the commercial inspection program.

In addition to City staff reporting illegal discharges, the Environmental Division also responds to calls to the storm water hotline and from online complaints. However, the vast majority of storm water violation reports are made from City staff. The low number of commercial businesses and relatively contained commercial zoning allows City staff to be the predominant eyes on the street for identifying storm water violations.

Table 5.2 presents and describes targeted FY 2008-09 outcomes and results, as well as implementation targets for FY 2009-10.

5.3 Outcomes Targeted for Staff Implementing Control Measures

5.3.1 Outcome Level 2 – Knowledge and Awareness

The City conducts annual training for all municipal employees. The training program for the Industrial and Commercial Component is specifically targeted at the Public Works Department because the Streets, Maintenance, and Sewer Crews are typically the first line of defense for storm water pollution. A training program has been implemented within the City to inform all

employees of the components and goals of the *2008 JURMP*. Training focuses on the use of Best Management Practices in daily operations, and is designed to create an overall sensitivity to pollution prevention concerns. Open discussions are encouraged to reinforce the importance of pollution prevention and enhance the program. The education effort relating to the Commercial and Industrial Component is discussed in the *2008 JURMP Section 10.0*.

5.3.2 Outcome Level 3 – Behaviors and Best Management Practice (BMP) Implementation

The City facilitates changes in behavior and implementation of BMPs at commercial businesses by providing continuous education efforts through face-to-face interactions, routine inspections, dissemination of brochures, mailing of post inspection letters, and responding to illegal storm water discharges. The *2008 JURMP Appendix F* defines minimum BMP requirements applicable to industrial and commercial projects in the City. The *2008 JURMP Section 7.0* provides more information on the procedural and administrative mechanisms in the City that promote behavioral changes for commercial, industrial, and mobile businesses. Additional information is presented below in Table 5.2 on the targeted outcomes and results for changes in behavior and BMP implementation as they were implemented in FY 2008-09.

5.3.3 Outcome Level 4 – Source Load Reductions

The two step approach of education on storm water pollution and enforcement of BMPs have unquestionably resulted in the source load reductions from commercial businesses. Although the City does not currently track source load reductions from commercial sites, the increased level of knowledge on storm water BMPs and cooperation among the local business community have successfully prevented the release of pollutants from commercial businesses. Table 5.2 provides a breakdown of program implementation and targeted outcomes and results for FY 2008-09.

Management Program Activities		Outcomes Targeted for Staff Implementing Control Measures		
Outcome Level 1a	Outcome Level 1b	Outcome Level 2	Outcome Level 3	Outcome Level 4
1.A. Program Planning and Administration	1.B. Management Program Implementation	Knowledge and Awareness	Behaviors and BMP Implementation	Source Load Reductions from Industrial and Commercial Sites
1. FY 2008-09 Program Updates <ul style="list-style-type: none"> ▪ Modifications to JURMP ▪ Updates to program documentation ▪ Updates to training content & materials 2. Program Review and Update <ul style="list-style-type: none"> ▪ Year-end program review ▪ Updated inventory 	1. Jurisdictional Requirements for Industrial and Commercial Sites 2. Municipal Staff Training 3. Commercial Business Inspections 4. Stormwater Hot Line Operation (619-424-4095) 5. Surveys and Special Investigations	A. Industrial and Commercial Site Responsibilities <i>Not targeted or assessed</i> B. Core Concepts C. Implementation Responsibilities <i>Not targeted or assessed</i>	A. Industrial and Commercial Activities <ul style="list-style-type: none"> ▪ Procedural and Administrative Behaviors ▪ BMP implementation ▪ Illicit discharge control B. Public Service Requests <ul style="list-style-type: none"> ▪ Respond to requests 	A. General Site Management Requirements B. BMP Maintenance <i>Not targeted or assessed</i> C. BMP Effectiveness <i>Not targeted or assessed</i>

Figure 5.1 – FY 2008-09 Implementation and Assessment Strategy for the Industrial and Commercial Component

Table 5.1 – Overview of Industrial and Commercial Component by Facility Type and Priority Classification

Category	Number	Description
A. Type of Facility		
Industrial	0	Industrial activity is extremely limited. Only one business in operation that can reasonably be classified as “industrial” is a surfboard manufacturing company that performs all of its operations indoors, and is very similar to a commercial facility. The term “commercial” is therefore used for the activities within the City. As such, there is no need in this jurisdiction to identify non-filers under the General Industrial Permit.
Commercial	170	
B. Priority Classification Totals		
High	38	High Priority include all businesses conducting outdoor or high threat to water quality activities, businesses known to have one or more treatment control BMP, and any business that had a previous storm water violation in the last reporting cycle. Medium Priority includes similar business but do not have high threat to water quality activities or conduct work outdoors. Low Priority includes all other businesses listed on the Commercial inventory.
Medium	102	
Low	---	
Mobile	30	Mobile business database is tracked and maintained on the new copermitee online Regional Mobile Business Inventory.
C. Inspection Totals		
High	38	The Environmental Division conducts all commercial inspections. Starting this reporting period 100% of high priority commercial businesses receive an annual inspection. The City endeavors to inspect as many businesses as possible during the reporting period.
Medium	12	
Mobile	---	Mobile businesses do not currently receive annual inspections. The Environmental Division informally inspects mobile businesses while responding to illegal discharge reports and public service requests.
JURMP Sections		Description of FY 2008-09 Changes
7.0 and Appendix F		BMP requirements of the JURMP applicable to industrial and commercial facilities were modified in accordance with the requirements of the updated Permit in March 2008.

Table 5.2 – Targeted Outcomes and Results for the Industrial and Commercial Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
LEVEL 1 OUTCOMES (MANAGEMENT PROGRAM ACTIVITIES)				
A. PROGRAM PLANNING AND ADMINISTRATION				
1. FY 2008-09 PROGRAM UPDATES				
a) MODIFICATIONS TO JURMP				
Update applicable JURMP sections per new Permit requirements	No updates made during FY 2008-09	Complete	Applicable updates were included in <i>JURMP Section 7.0</i> , submitted to the RWQCB on 03-24-08.	Not targeted
b) UPDATES TO PROGRAM DOCUMENTATION (POLICIES, PLANS, PROCEDURES, GUIDELINES, AND FORMS)				
Update program documentation for consistency with program updates	Updates made to Commercial Inspection Form and Mobile Business database. Fats, oils, and grease (FOG) program included with restaurant inspections.	Complete	The City made updates to its commercial inspection form. In addition, the City participated with the Copermitees Industrial and Commercial Workgroup in developing an online Mobile Business database and worked towards developing a standardized commercial business inventory list and standardized inspection form. The City also started incorporating fats, oils, and grease (FOG) management as part of the commercial business inspection for restaurants.	Make updates to program documentation as needed
c) UPDATES TO TRAINING PROGRAM				
Update training materials for consistency with <i>2008 JURMP Section 10.0</i>	Made updates to municipal survey	Under review	The City makes annual updates to the municipal training content and materials so that each education activity provides appropriate information for the target audience.	Update training materials for consistency with <i>2008 JURMP Section 10.0</i>

Table 5.2 – Targeted Outcomes and Results for the Industrial and Commercial Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
2. FY 2008-09 PROGRAM REVIEW AND UPDATE				
a) YEAR-END PROGRAM REVIEW				
Complete annual year-end program review	Review underway	In progress	An annual program review for the Industrial and Commercial Component is underway during the development of this JURMP Annual Report. The City continues to improve the implementation of the JURMP by conducting an annual review of each component and incorporating any modifications into the next reporting period.	Complete annual year-end program review
b) UPDATED SOURCE INVENTORY				
Update commercial inventory	Routine updates made to the commercial inventory. Last updates were made February 2009.	Complete	Routine updates are made to the commercial and industrial business inventory. A regional online mobile business database is also maintained as needed.	Update commercial inventory
B. MANAGEMENT PROGRAM IMPLEMENTATION				
1. Jurisdictional Requirements for Industrial and Commercial Sites				
Require commercial and industrial businesses to implement BMPs	Requirements implemented	Complete	The City requires all commercial and industrial sites/sources to implement designated minimum BMPs and other measures to prevent the discharge of pollutants to the MEP. The City's Urban Runoff Management and Discharge Control Ordinance (Chapters: 8.30.070, 8.30.090, and 8.30.100) mandate the implementation of designated BMPs and control measures.	Require commercial and industrial sites to implement appropriate BMPs
2. Municipal Staff Training				
Provide training for FY 2008-09	Training provided to Community Development Department 9/23/08 and Public Works	Complete	Training was conducted on 9/23/08 for the Community Development Department (Planning Division, Building Division, Code Compliance Division, and Redevelopment Division) and Public Works Department 9/17/08 on the necessary elements of the storm water program. A survey was also provided to establish a	Provide municipal staff training for FY 2009-10

Table 5.2 – Targeted Outcomes and Results for the Industrial and Commercial Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
	Department 9/17/08		baseline of knowledge. Daily interaction with City staff ensures that storm water pollution prevention remains a high priority throughout the City.	
3. Commercial Business Inspections				
Inspect commercial sites and activities	Conducted inspections at 100% of high priority commercial businesses, at non-high priority businesses, and as needed with mobile businesses	Completion	Commercial businesses are inspected as per the Municipal Permit. The City does not contract out inspections; therefore, no third party inspections were conducted. Efforts to address mobile businesses are underway through the Copermittee workgroup.	Inspect commercial facilities, including mobile sources as necessary
4. Storm Water Hotline Operation				
Operate a hotline to provide the public opportunities to report illegal storm water discharges	Hotline operated throughout reporting period	Complete	A Storm Water Hotline (619-424-4095) was operated throughout FY 2008-09 to provide the public a means of reporting illegal storm water discharges from commercial businesses.	Operate a hotline to provide the public opportunities to report illegal storm water discharges
5. Surveys and Special Investigations				
Provide a survey to municipal staff	Administered a survey to municipal staff as part of annual training program	Complete	Training was conducted on 9/23/08 for the Community Development Department and 9/17/08 for the Public Works Department on the necessary elements of this component. A survey was provided to establish a baseline of knowledge. The City incorporates surveys or pre and post tests into training programs and administers them when appropriate.	Survey municipal staff to ascertain baseline knowledge of storm water program

Table 5.2 – Targeted Outcomes and Results for the Industrial and Commercial Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
Enhance commercial inspection program	Incorporate fats, oils, and grease (FOG) management into commercial inspection program	Under review	The inspection of FOG management practices at eating and drinking establishments is a new program being implemented into the commercial inspection program to target the prevention of sanitary sewer overflows. The Environmental Division is working closely with the Sewer Division to identify FOG hotspots. The City continues to refine outreach and education efforts with businesses and local community.	Include a FOG management practices as part of the commercial inspection of eating and drinking establishments
LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY STAFF AND BUSINESSES)				
Establish a baseline of staff knowledge regarding applicable program content	Performed a survey on 9/23/08 of Community Development and 9/17/08 of Public Works Department as part of annual training.	Survey consisted of a 16 question test. The results are as follows: Community Development Department (12 surveys completed) and average score 89%. Public Works Department (23 surveys completed) and average score 81%.	Training was conducted on 9/23/08 for the Community Development Department and 9/17/08 for the Public Works Department on the necessary elements of this component. The survey administered during the training session provides a baseline of knowledge of core concepts and helps in refining the municipal training program for the next reporting period. The City incorporates surveys or pre and post tests into training programs and administers them when appropriate. Results from this reporting period indicate that the Community Development Department has a greater level of knowledge on core concepts of the storm water program than the Department of Public Works. The overall results still show a high level of knowledge on core storm water management concepts in the City.	Survey municipal staff to assess knowledge of storm water program
Not targeted or assessed	---	---	No attempts have been made to establish a baseline level of knowledge and awareness of core storm water program concepts at local businesses. Anecdotal evidence such as high level of compliance noted during commercial inspections and continual interaction with local business owners suggest a high level of knowledge of basic storm water concepts.	Survey local businesses to assess baseline knowledge of storm water program

Table 5.2 – Targeted Outcomes and Results for the Industrial and Commercial Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY STAFF AND BUSINESSES)				
A. INDUSTRIAL AND COMMERCIAL ACTIVITIES				
1. Procedural and Administrative Behaviors				
July 1, 2008 through June 30, 2009				
Inspect businesses for compliance	50 sites inspected (38 High Priority and 12 Medium Priority)	Complete	The City inspections 100% of high priority commercial businesses, non-high priority businesses, and mobile businesses as needed. Inspections consist of observing business operations, reviewing minimum BMPs, and enforcing pollution prevention practices.	Inspect businesses
Notify business owners/operators of BMP requirements, including mobile businesses	71 sites notified (54 Fixed Commercial and 17 Mobile Businesses)	Complete	The City notifies business owners and operators, both fixed and mobile, of BMP requirements through a combination of methods including site inspections, follow-up inspection reports, direct mailings, inclusion of BMP information with business license and special event vendor packets, advertisements in newspapers, online resources such as the Project Clean Water website and City's website, and targeted workshops focused on specific business sectors. The City only accounts for direct site visits in the implementation results when notifying business owners of BMP requirements. More businesses receive BMP information than are tracked on the City's database.	Notify business owners/operators of BMP requirements, including mobile businesses
Enforce compliance and track violations	71 Verbal contacts 52 Informative letters sent 4 Notice of Violations	Complete	The City enforces compliance at all businesses, including mobile sources, using an escalating series of enforcement actions. Verbal or written warnings are used when violation in question is minor. Notices of Violations (NOVs) may be issued for any observed violation. And escalating administrative penalties, fines, and civil penalties may be enforced for non compliance. Violations are tracked and maintained on the Environmental server database.	Enforce compliance and track violations

Table 5.2 – Targeted Outcomes and Results for the Industrial and Commercial Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
2. BMP Implementation				
July 1, 2008 through June 30, 2009				
Not targeted or assessed	---	---	Starting in FY 2009-10, the City will begin incorporating evaluation of business owner and operator knowledge of applicable BMPs, and will determine whether knowledge is being retained over time. Anticipated content includes BMP knowledge and implementation, core concepts of good housekeeping practices, and specific responsibilities including employee training.	Establish a baseline of business operator knowledge regarding applicable BMP implementation
3. Illicit Discharge Control				
July 1, 2008 through June 30, 2009				
Investigate complaints	21 Complaints investigated	Complete	The Environmental Division responds to complaints received from Storm Water Hotline, online complaint form, and City staff. All investigations are documented and	Investigate illicit discharges from businesses
B. PUBLIC SERVICE REQUESTS				
Not targeted or assessed	21 Complaints received and investigated	---	The City does not currently track public service requests for industrial and commercial activities. The City does track reports of illegal discharges from the Storm Water Hotline, online complaint form, and City staff. During this reporting period 21 reports were received and investigated.	Not targeted
LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM INDUSTRIAL AND COMMERCIAL COMPONENT)				
A. GENERAL SITE MANAGEMENT REQUIREMENTS				
Not targeted or assessed	---	---	Commercial and industrial facilities are required to implement minimum BMPs which are verified during the commercial inspection process. Source load reductions from minimum BMPs are not tracked.	Not targeted

Table 5.2 – Targeted Outcomes and Results for the Industrial and Commercial Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
B. BMP MAINTENANCE				
Not targeted	12 Treatment control BMPs installed at commercial businesses	---	The City does not currently track BMP maintenance for industrial and commercial activities. Maintenance and operation compliance for treatment control BMPs for commercial and industrial locations are managed under the Development Planning Component of this Annual Report.	Not targeted

Figure 5.2 – Best Management Practices for your Business Brochures

<p style="text-align: center;">Storm Water Compliance Inspections</p> <p>The City of Imperial Beach has developed an inventory of all existing commercial businesses and has prioritized them according to the type of business, proximity to a receiving water and potential threat to water quality.</p> <p>Based on this prioritization, the City will be conducting storm water compliance inspections of commercial and industrial facilities within the City. Mobile businesses operating within the City may also be inspected.</p> <p>These inspections will include a meeting with the business owner or operator, a walk through of the facility, a review and evaluation of current best management practices, and recommendations for additional measures that may be required to comply with the City's storm water permit and ordinance.</p> 	<p style="text-align: center;">Report all spills immediately to the Storm Water Hotline: (619) 424-4095 or the Sheriff Dispatch at (619) 585-7232</p> <p style="text-align: center;">REMEMBER ONLY RAIN IN THE STORM DRAIN!</p> <p style="text-align: center;">City of Imperial Beach Storm Water Protection Program 825 Imperial Beach Boulevard Imperial Beach, CA 91932</p> <p style="text-align: center;">Storm Water Hotline: (619) 424-4095</p>   <p style="text-align: center;">Printed on Recycled Paper</p>	<p style="text-align: center; font-size: 24px;">Best Management Practices for your Business</p> <p style="text-align: center; font-size: 12px;">ONLY RAIN IN THE STORM DRAIN</p>   <p style="text-align: center; font-weight: bold; color: white;">City of Imperial Beach Storm Water Protection Program</p> <p style="text-align: center; font-weight: bold; color: white;">Storm Water Hotline: (619) 424-4095</p>
<p style="text-align: center;">Did you know that urban storm water is the biggest contributor to coastal water pollution?</p> <p>Whether your business is 2 blocks or 2 miles from the coast, you can unknowingly contribute to storm water pollution through improper housekeeping and maintenance practices.</p> <p>One of the most common types of pollution from businesses is contaminated water runoff, usually from cleaning and maintenance activities. Simple best management practices (BMPs) can prevent storm water pollution, and prevention is good business. It means clean water, clean beaches and shows your customers you care about the community.</p> <p style="text-align: center;">What is storm water pollution?</p> <p>Storm water pollution is urban runoff water that has picked up pollutants as it flows through the storm drain system—a network of channels, gutters and pipes that collect runoff from city streets, neighborhoods, construction sites, parking lots, etc.—and empties directly into receiving waters.</p> <p>In the City of Imperial Beach, these receiving waters are the Pacific Ocean, Tijuana Estuary, Tijuana River, Otay River and San Diego Bay.</p> 	<p style="text-align: center;">What can your business do to help?</p> <p>The following are steps you can take in and around your business to prevent water pollutants from entering the storm drain.</p> <p>Good Housekeeping</p> <ul style="list-style-type: none"> • Use brooms or mops to clean dumpsters, loading docks, pavements, and sidewalks, instead of using a hose or pressure washing. • Never disposed of any wash water down the storm drain, streets, sidewalks, parking lots or driveways. Use the sanitary sewer. • Use non-toxic products for cleaning and gardening maintenance. • Make sure landscape irrigation is properly set to prevent over irrigation. Landscape should be watered in the early morning or evening and for no longer than 10 minutes. <p>Materials Storage and Handling</p> <ul style="list-style-type: none"> • When possible store materials indoors or under cover areas not exposed to rain and water. • Store liquids, oil, hazardous waste, and other chemicals in a designated area with secondary containment. • Keep liquid waste segregated. Many fluids can be recycled through hazardous waste disposal companies, as long as they are not mixed. <p>Spill Response</p> <ul style="list-style-type: none"> • Use absorbents such as cat litter to clean up small spills and disposed properly. • Keep rags and absorbents readily accessible. • Keep a spill response plan current and ensure that employees are trained properly. <p>Waste Management</p> <ul style="list-style-type: none"> • Keep property free of trash and debris. Keep all trash inside dumpsters or containers until it can be hauled away. • Dumpster lids should always be kept closed to prevent rainwater from entering. • Never place hazardous waste in dumpster or trash bin. • Recycle cans, bottles, paper, cardboards, and newspaper. • Recycle cooking oil, motor oil and filters, anti-freeze, batteries, solvents, lubricants, tires, etc. These items are not trash, and are illegal to dump. Contact a hazardous waste hauler for proper disposal. <p>Employee Training</p> <ul style="list-style-type: none"> • Conduct regular training with all employees. Train employees on good housekeeping practices and the importance of pollution prevention. • Inform employees of materials that can be recycled and those that have special disposal requirement. Identify and label containers. • Post good housekeeping tips and best management practices on visible places such as the kitchen, or employee bulletin boards. • Inform subcontractors, property managers, gardeners, and maintenance or cleaning crews about the storm water requirements and pollution prevention measures. 	

Figure 5.3 – Commercial Business Inspection Form

<div style="text-align: center;">  <p>CITY OF IMPERIAL BEACH JURISDICTIONAL URBAN RUNOFF MANAGEMENT PROGRAM COMMERCIAL INSPECTION REPORT</p> </div> <p>Name of Facility: _____ Address: _____ Phone Number: _____</p> <p>Contact Position: _____ Business Type/Activity: _____ Date: _____</p> <p> <input type="checkbox"/> Initial Inspection <input checked="" type="checkbox"/> Routine Inspection <input type="checkbox"/> Complaint Inspection </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr style="background-color: #cccccc;"> <th colspan="4" style="text-align: center; padding: 5px;">BMP IMPLEMENTATION</th> </tr> <tr> <th style="width: 15%; padding: 5px;">Activity</th> <th style="width: 35%; padding: 5px;">Observation</th> <th style="width: 15%; padding: 5px;">Corrective Action Required</th> <th style="width: 35%; padding: 5px;">Remarks</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">Housekeeping</td> <td style="height: 80px;"></td> <td></td> <td></td> </tr> <tr> <td style="padding: 5px;">Waste Management</td> <td style="height: 80px;"></td> <td></td> <td></td> </tr> <tr> <td style="padding: 5px;">Materials Storage</td> <td style="height: 80px;"></td> <td></td> <td></td> </tr> <tr> <td style="padding: 5px;">Spill Prevention and Response</td> <td style="height: 80px;"></td> <td></td> <td></td> </tr> </tbody> </table> <p style="text-align: center; margin-top: 20px;">1 of 2</p>	BMP IMPLEMENTATION				Activity	Observation	Corrective Action Required	Remarks	Housekeeping				Waste Management				Materials Storage				Spill Prevention and Response				<div style="text-align: center;">  <p>CITY OF IMPERIAL BEACH JURISDICTIONAL URBAN RUNOFF MANAGEMENT PROGRAM COMMERCIAL INSPECTION REPORT</p> </div> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 20px;"> <tr style="background-color: #cccccc;"> <td style="text-align: center; padding: 5px;">CORRECTIVE ACTIONS IMPLEMENTED</td> </tr> <tr> <td style="height: 40px;"></td> </tr> <tr style="background-color: #cccccc;"> <td style="text-align: center; padding: 5px;">PHOTOGRAPHS (if applicable)</td> </tr> </table> <p style="text-align: center; margin-top: 20px;">2 of 2</p>	CORRECTIVE ACTIONS IMPLEMENTED		PHOTOGRAPHS (if applicable)
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Spill Prevention and Response																												
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PHOTOGRAPHS (if applicable)																												

Table 5.3 – Commercial Business Inspections FY 2008-09

BUSINESS NAME	SITE ADDRESS	CLASSIFICATION	SIC Code	METALS	ORGANICS	OIL & GREASE	SEDIMENT	PESTICIDES	NUTRIENTS	GROSS POL	BACTERIA	TRASH	HU AREA	PRIORITY	INSPECTIONS FY 08-09
HAWKINS AUTO BODY	519 FLORIDA ST	AUTO BODY & PAINT	7539	x	x	x	x			x		x	910.20	High	3/10/09
GENES' AUTOMOTIVE	1085 PALM AVE	AUTO REPAIR & MAINTENANCE	7538	x	x	x	x			x		x	910.20	High	3/10/09
TITO AUTO SERVICE	1335 PALM AVE	AUTO REPAIR & MAINTENANCE	7538	x	x	x	x			x		x	910.20	High	3/10/09
MASON'S ALIGNMENT-BRAKE-MUFFLE	975 PALM AVE	AUTO REPAIR & MAINTENANCE	7538	x	x	x	x			x		x	910.20	High	3/10/09
PRECISION FOREIGN	1240 PALM AVE	AUTO REPAIR & MAINTENANCE	7538	x	x	x	x			x		x	910.20	High	3/10/09
SOPHISTICATED AUTO	987 PALM AVE	AUTO REPAIR & MAINTENANCE	7538	x	x	x	x			x		x	910.20	High	3/10/09
TUNES LUBES ETC.	741 PALM AVE	AUTO REPAIR & MAINTENANCE	7538	x	x	x	x			x		x	910.20	High	10/27/08
WALLY'S IGA	836 PALM AVE	FOOD MARKET	5411	x	x	x	x			x	x	x	910.20	High	10/29/08
DEPENDABLE CARBURETOR EXCHANGE	660 EMORY ST	AUTO REPAIR & MAINTENANCE	7538	x	x	x	x			x		x	910.20	High	4/1/09
ALIBERTO'S MEXICAN FOOD	1183 13TH ST	EATING / DRINKING	5812		x	x				x	x	x	910.20	High	4/1/09
BEACH CLUB GRILLE	710 SEACOAST DR, SUITE F	EATING / DRINKING	5812		x	x				x	x	x	910.10	High	4/1/09
EI CILANTRO	764 13TH ST	EATING / DRINKING	5812		x	x				x	x	x	910.20	High	4/2/09
EL TAPATIO RESTAURANT INC	260 PALM AVE	EATING / DRINKING	5812		x	x				x	x	x	910.10	High	4/1/09
JACK IN THE BOX #12	890 PALM AVE	EATING / DRINKING	5812		x	x				x	x	x	910.20	High	4/1/09
DON PANCHOS TACO SHOP	690 SR-75	EATING / DRINKING	5812		x	x				x	x	x	910.20	High	4/2/09
ROLANDO'S TACO SHOP	805 SEACOAST DR	EATING / DRINKING	5812		x	x				x	x	x	910.10	High	4/15/09
MICKIES BAR AND GRILL	220 PALM AVE	EATING / DRINKING	5812		x	x				x	x	x	910.10	High	5/6/09
SOMBRERO MEXICAN FOOD	189 PALM AVE	EATING / DRINKING	5812		x	x				x	x	x	910.10	High	5/18/09

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BUSINESS NAME	SITE ADDRESS	CLASSIFICATION	SIC Code	METALS	ORGANICS	OIL & GREASE	SEDIMENT	PESTICIDES	NUTRIENTS	GROSS POL	BACTERIA	TRASH	HU AREA	PRIORITY	INSPECTIONS FY 08-09
WOODIES	710 SEACOAST DR, SUITE E	EATING / DRINKING	5812		x	x				x	x	x	910.10	High	4/1/09
YE OLDE PLANK INN	24 PALM AVE	EATING / DRINKING	5813		x	x				x	x	x	910.10	High	5/18/09
SUBWAY	876 SEACOAST DR	EATING / DRINKING	5812		x	x				x	x	x	910.10	High	4/15/09
THE WAVE CAFE	809 SEACOAST DR	EATING / DRINKING	5812		x	x				x	x	x	910.10	High	4/15/09
7-ELEVEN	1311 PALM AVE	RETAIL FUELING	5541	x	x	x	x			x	x	x	910.20	High	5/6/09
7-ELEVEN	1303 IMPERIAL BEACH BLVD	RETAIL FUELING	5541	x	x	x	x			x	x	x	910.20	High	2/6/09
BEACH SIDE STATION	681 SR-75	RETAIL FUELING	5541	x	x	x	x			x		x	910.10	High	4/2/09
ARCO	1185 PALM AVE	RETAIL FUELING	5541	x	x	x	x			x		x	910.20	High	4/2/09
Valero	1300 IMPERIAL BEACH BLVD	RETAIL FUELING	5541	x	x	x	x			x		x	910.20	High	2/6/09
G & M Oil, 76 STATION	907 PALM AVE	RETAIL FUELING	5541	x	x	x	x			x		x	910.20	High	2/6/09
MARRERO'S CAR WASH	1257 IMPERIAL BEACH BLVD	CARWASH	7542	x	x	x	x			x		x	911.11	High	4/15/09
MIKE'S CAR WASH	1117 PALM AVE	CARWASH	7542	x	x	x	x			x		x	910.20	High	4/15/09
RJ's CAR WASH	730 10TH ST	CARWASH	7542	x	x	x	x			x		x	910.20	High	4/15/09
COW-A-BUNGA CA GLACIER FNAME	10 EVERGREEN	EATING / DRINKING	5812		x	x				x	x	x	910.10	High	4/15/09
I.B. MEXICAN GRILL, LLC	1337 PALM	EATING / DRINKING	5812		x	x				x	x	x	910.20	High	5/6/09
KATY'S CAFE	704 SEACOAST	EATING / DRINKING	5812		x	x				x	x	x	910.10	High	4/15/09
KFC CORPORATION	1056 13TH ST	EATING / DRINKING	5812		x	x				x	x	x	911.11	High	10/21/08
LA POSTA MARKET	1268 IMPERIAL BEACH BLVD	FOOD MARKET	5411		x	x				x	x	x	911.11	High	10/20/08
13TH STREET MARKET	1126 13TH ST	FOOD MARKET	5411		x	x				x	x	x	911.11	Non-High	10/27/08
ALL AMERICAN CAR WASH	1158 PALM AVE	CARWASH	7542	x	x	x	x			x		x	910.20	High	10/27/08
BURGER KING #806	1180 PALM AVE	EATING / DRINKING	5812		x	x				x	x	x	910.20	Non-High	10/27/08

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BUSINESS NAME	SITE ADDRESS	CLASSIFICATION	SIC Code	METALS	ORGANICS	OIL & GREASE	SEDIMENT	PESTICIDES	NUTRIENTS	GROSS POL	BACTERIA	TRASH	HU AREA	PRIORITY	INSPECTIONS FY 08-09
C.H. DONUTS	1070 13TH ST, SUITE A	EATING / DRINKING	5812		x	x				x	x	x	911.11	Non-High	10/20/08
GIANT PIZZA KING #5	600 PALM AVE, SUITE 100	EATING / DRINKING	5812		x	x				x	x	x	910.2	Non-High	10/20/08
GIANT PIZZA KING #4	1070 13TH ST, SUITE B	EATING / DRINKING	5812		x	x				x	x	x	911.11	Non-High	10/20/08
K-C'S CHINESE FOOD	1299 IMPERIAL BEACH BLVD	EATING / DRINKING	5812		x	x				x	x	x	911.11	Non-High	11/3/08
SIESTA RV PARK	409 PALM AVE	TRAILER PARK	6515		x	x			x	x	x	x	910.20	Non-High	11/3/08
PALM AVENUE LIQUOR & MARKET	1200 PALM	OTHER - FIXED	5411							x		x	910.20	Non-High	10/28/08
MCDONALDS/SCAROB INC.	1135 PALM AVE	EATING / DRINKING	5812		x	x				x	x	x	910.20	Non-High	10/27/08
AROMA THAI	757 SEACOAST DR	EATING / DRINKING	5812		x	x				x	x	x	910.2	Non-High	4/1/09
SEACOAST PIZZA	807 SEACOAST DR	EATING / DRINKING	5812		x	x				x	x	x	910.2	Non-High	4/15/09
PRETZELES AND MORE	10 EVERGREEN #D	EATING / DRINKING	5812		x	x				x	x	x	910.1	High	4/15/09
TIN FISH	910 SEACOAST DR	EATING / DRINKING	5812		x	x			x	x	x	x	910.2	Non-High	5/6/09

6.0 RESIDENTIAL COMPONENT

6.1 Introduction

The City endeavors to prevent or eliminate the discharge of pollutants and runoff from residential sources. This component is primarily applicable to the Environmental Program Division of the Department of Public Works and the City's Code Enforcement Division. Efforts are made to educate the public and oversee compliance with local urban runoff regulations to reduce the release of pollutants to the MEP. This section of the Annual Report discusses program implementation and changes made to the Residential Component as it relates to management program activities and outcomes targeted for staff implementing control measures.

6.2 Level 1 Outcomes – Management Program Activities

6.2.1 Program Planning and Administration

The Program Planning and Administration element of the Annual Report addresses modifications to the JURMP, updates to program documentation, training content, materials, and year-end program review. It also addresses participation in a Regional Education Program.

The City's implementation and assessment strategy for the Residential Component is described in the *2008 JURMP Section 8.0*. During FY 2008-09 no updates were made to the high threat to water quality residential areas or activities. Figure 6.2 provides a map of the City and the high threat to water quality residential areas. Table 6.1 also provides an overview of the residential areas and activities. The only update the City made in regards to program documentation was update the Notice of Violation (NOV) form, which is provided in Figure 6.3. All other program planning and administration elements remain unchanged from the *2008 JURMP Section 8.0*.

Figure 6.1 presents the implementation and assessment strategy for the major elements of the Residential Component. Additional documentation on the targeted outcomes and results for the Residential Component is presented in Table 6.2.

During this reporting period, the City participated in the Education and Residential Sources Workgroup with the San Diego Copermittees and held the responsibility of co-chair for the group. Significant progress continues to be made in the areas of media and public relations, materials development, outreach to underserved target audiences, partnership development, regional website development, regional brand, regional events, and program assessment through a county-wide telephone survey.

6.2.2 Management Program Implementation

The Management Program Implementation element of the Annual Report addresses Jurisdictional requirements, training activities, residential inspections, public awareness and response, and surveys and special investigations.

The City enforces its storm water ordinances for all residential areas and activities to maintain compliance with the Municipal Storm Water Permit. Public outreach and education as outlined in the *2008 JURMP Section 10.0* encourages residents to comply with the minimum set of BMPs listed in Imperial Beach Municipal Code 8.30.080. The City encourages the use of pollution prevention methods for all residents and provides convenient and cheap house hold hazardous waste disposal. City staff also receives annual training on minimum BMP requirements.

Table 6.2 presents and describes targeted FY 2008-09 outcomes and results, as well as implementation targets for FY 2009-10.

6.3 Outcomes Targeted for Staff Implementing Control Measures

6.3.1 Outcome Level 2 – Knowledge and Awareness

The City conducts annual training for all municipal employees. The training program focuses on the use of Best Management Practices in daily operations, and has been designed to create an overall sensitivity to pollution prevention concerns. Open discussions and active involvement in the monitoring and enforcement of minimum BMPs is encouraged for all staff. Field staff are trained to recognize illegal discharges and BMP deficiencies and to report them to the Environmental Division. The education effort for the Residential Component is discussed in the *JURMP Section 10.0*.

6.3.2 Outcome Level 3 – Behaviors and Best Management Practice (BMP) Implementation

The City facilitates changes in behavior and implementation of BMPs for high threat to water quality activities and residential areas by providing education through face-to-face interactions, disseminating education materials through various media, and responding to illegal discharges. The *2008 JURMP Appendix G* defines minimum BMP requirements applicable to residential areas and activities in the City. These minimum BMPs were adopted as part of the *Imperial Beach Municipal Code 8.30.080* and became effective March 24, 2008. BMP requirements were reviewed for necessary updates or modifications during the reporting period and no additional changes were determined to be necessary at this time. The *2008 JURMP Section 8.0* provides additional information on the procedural and administrative mechanisms in the City that promote changes in behavior for residential areas.

6.3.3 Outcome Level 4 – Source Load Reductions

The City does not track individual source load reductions to receiving waters from residential areas or activities. However, increased public awareness about urban runoff and implementation of storm water BMPs among residents has undoubtedly prevented the release of some pollutants.

The City continues to quantify load reductions whenever feasible for disposal of household hazardous waste, used oil, and special clean up events. The City provides residents a variety of options for the collection and disposal of house hold hazardous waste. During FY 2008-09 roughly 4.5 tons of hazardous materials were properly disposed or recycled by City residents at the South Bay HHW location. The City also one again held the annual Home Front Clean-up and Citywide Garage Sale events. Participation was up for both the Citywide Garage Sale with 732 participants and Home Front Clean-up with 93 participants. The final total of waste collected during the Home Front Clean Up event was 154.3 tons of trash, metals, green, and construction waste. Table 6.2 provides an overview of FY 2008-09 source load reductions and results for the Residential Component.

Management Program Activities		Outcomes Targeted for Staff Implementing Control Measures		
Outcome Level 1a	Outcome Level 1b	Outcome Level 2	Outcome Level 3	Outcome Level 4
1.A. Program Planning and Administration	1.B. Management Program Implementation	Knowledge and Awareness	Behaviors and BMP Implementation	Source Load Reductions from Residential Areas and Activities
<p>1. FY 2008-09 Program Updates</p> <ul style="list-style-type: none"> ▪ Modifications to JURMP ▪ Updates to program documentation ▪ Updates to training content & materials <p>2. Program Review and Update</p> <ul style="list-style-type: none"> ▪ Year-end program review ▪ Updated source inventory 	<p>1. BMP Implementation</p> <p>2. Municipal Staff Training</p> <ul style="list-style-type: none"> ▪ Program Administration Staff ▪ Program Implementation Staff <p>3. Enforcement of Residential Areas and Activities</p> <p>4. Evaluation of Oversight of Residential Areas and Activities</p> <p>5. Regional Residential Education Program</p> <p>6. Surveys and Special Investigations</p> <p><i>Not targeted or assessed</i></p>	<p>A. Illicit Discharge Reporting</p> <p>B. Core Concepts</p> <p><i>Not targeted or assessed</i></p> <p>C. Implementation Responsibilities</p> <p><i>Not targeted or assessed</i></p>	<p>A. Residential Areas and Activities</p> <ul style="list-style-type: none"> ▪ Procedural and Administrative Behaviors <p>C. Pet Waste Management</p> <p>D. Public Service Requests</p> <ul style="list-style-type: none"> ▪ Response to requests ▪ Facilitation of proper BMPs <p>E. Cleanup Activities</p> <p>Public participation and involvement</p>	<p>A. Household Hazardous Waste Collected</p> <p>B. Used Oil Collected</p> <p>C. Universal and Electronic Waste Collected</p> <p>D. Pet Waste</p> <p>E. Special Event Recycling and Waste Management</p>

Figure 6.1 – FY 2008-09 Implementation and Assessment Strategy for the Residential Component

Table 6.1 – Overview of Residential Component

Category	Pounds	Number	Description of Changes
A. Residential Threat to Water Quality Prioritization			
High	---	6	All residential areas in the City are considered high priority.
Medium	---	---	
Low	---	---	
B. House Hold Hazardous, Electronic, and Universal Waste Disposal			
Flammable and Poison	2,557	---	Imperial Beach residents have a variety of options for the collection and disposal of house hold hazardous waste. Most residents utilize the South Bay HHW Collection center at the City of Chula Vista. The amount of waste dropped off by Imperial Beach residents is provided in the table to the left.
Acid, Base, Oxidizer, and PCB-containing	135	---	
Reclaimable (Antifreeze, Car batteries, Latex Paint, Used Oil and filters)	2,172	---	The City also offers curbside pickup of HHW, used oil, and a number of regional collection events for electronic and universal waste. The disposal totals for these additional activities are not provided in this report.
Other HHW	3,070		
Universal and Electronic Waste	2,433		
Total Waste Disposed	10,367		
JURMP Sections	Description of FY 2008-09 Changes		
8.0 and Appendix G	BMP requirements of the JURMP applicable to residential areas and activities were modified in accordance with the requirements of the updated Permit in March 2008.		

Table 6.2 – Targeted Outcomes and Results for the Residential Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
LEVEL 1 OUTCOMES (MANAGEMENT PROGRAM ACTIVITIES)				
A. PROGRAM PLANNING AND ADMINISTRATION				
1. FY 2008-09 PROGRAM UPDATES				
a) MODIFICATIONS TO JURMP				
Update applicable JURMP sections per new Permit requirements	No updates made during FY 2008-09	Complete	Applicable updates were included in the 2008 JURMP Section 8.0, submitted to the RWQCB on 03-24-08.	Not targeted
b) UPDATES TO PROGRAM DOCUMENTATION (POLICIES, PLANS, PROCEDURES, GUIDELINES, AND FORMS)				
Update program documentation for consistency with program updates	Updates were made to the storm water notice of violation (NOV) form	Complete	The City developed a storm water specific Notice of Violation form that is used for code enforcement for both Public Works Department and Community Development Department. The form is provided in Figure 6.3.	Update program documentation for consistency with program updates
c) UPDATES TO TRAINING PROGRAM				
Update training materials for consistency with 2008 JURMP Section 10.0	Made updates to municipal survey	Under review	The City makes annual updates to the municipal training content and materials so that each education activity provides appropriate information for the targeted audience.	Update training materials for consistency with 2008 JURMP Section 10.0
2. FY 2008-09 PROGRAM REVIEW AND UPDATE				
a) YEAR-END PROGRAM REVIEW				
Complete annual year-end program review	Review underway	In progress	An annual program review for Residential Component is underway during the development of this JURMP Annual Report. The City continues to improve the implementation of the JURMP by conducting an annual review of each component and incorporating	Complete annual year-end program review

Table 6.2 – Targeted Outcomes and Results for the Residential Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
			any modifications into the next reporting period.	
b) UPDATED SOURCE INVENTORY				
Identify high threat to water quality areas	Update not needed	---	The City has previously identified the high threat to water quality residential areas and activities. All residential areas in the City are considered high threat to water quality areas. Figure 6.2 provides a map of the high priority residential areas. The 2008 JURMP Section 8.0 provides a list of high threat to water quality activities.	Update as needed
B. MANAGEMENT PROGRAM IMPLEMENTATION				
1. BMP Implementation				
Require residents to implement BMPs	Requirements implemented	Complete	The City requires all residential areas to implement designated minimum BMPs and other measures to prevent the discharge of pollutants to the MEP. The City enforces its <i>Urban Runoff Management and Discharge Control Ordinance</i> and provides education and outreach to local residents.	Provide BMP handouts and outreach
Facilitate proper management and disposal of household hazardous waste (HHW)	Provided a variety of disposal options for used oil, toxic materials, and other hazardous waste	Complete	The City provides a variety of options for the proper management and disposal of used oil, toxic materials, and other HHW. Residents are generally directed to drop off hazardous materials at the South Bay HHW center at the City of Chula Vista. The City also provides curb side pickups and a number of regional collection events for HHW, used oil, electronic waste, and universal waste.	Facilitate proper HHW management and disposal opportunities
Facilitate proper management and disposal of waste	Provided proper waste management at special events and held annual Home Front Clean Up drop-off event	Complete	The City partners with EDCO Disposal to provide proper waste management and disposal for residents. The City also ensures proper waste management and storm water compliance at special events. Additionally, the City once again held its annual Home Front Clean Up drop-off event to collect waste material.	Facilitate proper management and disposal opportunities
2. Municipal Staff Training				

Table 6.2 – Targeted Outcomes and Results for the Residential Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
Provide training for FY 2008-09	Training provided to Community Development Department 9/23/08 and Public Works Department 9/17/08	Complete	Training was conducted on 9/23/08 for the Community Development Department (Planning Division, Building Division, Code Compliance Division, and Redevelopment Division) and Public Works Department 9/17/08 on the necessary elements of the storm water program. A survey was also provided to establish a baseline of knowledge. Daily interaction with City staff ensures that storm water pollution prevention remains a high priority throughout the City.	Provide municipal staff training for FY 2009-10
3. Enforcement of Residential Areas and Activities				
Enforce minimum BMPs in residential areas	Responded to storm water violations reported by staff and public	Complete	The City enforces its storm water ordinance and the Municipal Permit for all residential areas and activities through the use of verbal warnings with distribution of BMP literature, Notices of Violation, Notices of Abatement, and additional penalties or fines and civil and/or criminal court actions. The Environmental Division responds to storm water violations, which are reported by City staff and public.	Enforce BMPs
4. Evaluation of Oversight of Residential Areas and Activities				
Evaluate methods of oversight and enforcement for residential areas and activities	Operate storm water hotline and utilizes monthly sewer and street inspections to identify BMP deficiencies or storm water violations	Complete	A Storm Water Hotline (619-424-4095) was operated throughout FY 2008-09. The City received 15 reports on the Storm Water Hotline (619-424-4095) for storm water violations in residential areas. The Environmental Division responded to another 40 residential violations reported by City staff. The City also operates an online complaint form that does not get utilized very often. No reports for storm water violations were received during this reporting period from the online complaint form.	Evaluate methods of oversight for residential areas and activities
5. Regional Residential Education Program				
Participate in	Held co-chair	On going	During this reporting period, the City participated in the Education	Participate in

Table 6.2 – Targeted Outcomes and Results for the Residential Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
Regional Residential Education Program	position of the Education and Residential Sources Workgroup and chair position of the Underserved Target Audience Sub-workgroup		and Residential Sources Workgroup with the San Diego Copermittees and held the responsibility of co-chair for the group. Significant progress continues to be made in the areas of media and public relations, materials development, outreach to underserved target audiences, partnership development, regional website development, regional brand, regional events, and program assessment through a county-wide telephone survey.	Regional Residential Education Program
6. Surveys and Special Investigations				
Not targeted or assessed	---	---	Special investigations were not conducted in FY 2008-09, and are not routinely conducted as part of the implementation strategy for this program element.	Not targeted
Not targeted or assessed	Surveys incorporated into regional educational events	---	Surveys were not included during this reporting period for City based special events. However, surveys were included as part of municipal training and regional education efforts by the Education and Residential Sources Workgroup.	Incorporate surveys into local special events and education activities
LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY STAFF AND RESIDENTS)				
Establish a baseline of staff knowledge regarding applicable program content	Performed a survey on 9/23/08 of Community Development and 9/17/08 of Public Works Department as part of annual training.	Survey consisted of a 16 question test. The results are as follows: Community Development Department (12 surveys completed) and average score 89%. Public Works	Training was conducted on 9/23/08 for the Community Development Department and 9/17/08 for the Public Works Department on the necessary elements of this component. The survey administered during the training session provides a baseline of knowledge of core concepts and helps in refining the municipal training program for the next reporting period. The City incorporates surveys or pre and post tests into training programs and administers them when appropriate. Results from this reporting period indicate that the Community Development Department has a greater level of knowledge on core concepts of the storm water program than the Department of Public	Survey municipal staff to assess knowledge of storm water program

Table 6.2 – Targeted Outcomes and Results for the Residential Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
		Department (23 surveys completed) and average score 81%.	Works. The overall results still show a high level of knowledge on core storm water management concepts in the City.	
Not targeted or assessed	---	---	Starting in FY 2009-10, the City will begin evaluating education success and to determine whether changes in knowledge are being retained over time.	Establish a baseline of resident knowledge regarding urban runoff
LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY STAFF AND RESIDENTS)				
A. RESIDENTIAL AREAS AND ACTIVITIES				
1. Procedural and Administrative Behaviors				
July 1, 2008 through June 30, 2009				
Enforce minimum BMPs and track violations	32 Verbal Warnings, 1 Notice of Abatement, 17 Notice of Violations, 11 informative letters, and 3 cleanup cost recoveries	Complete	The City enforces its storm water ordinance and the Municipal Permit for all residential areas and activities through the use of verbal warnings with distribution of BMP literature, Notices of Violation, Notices of Abatement, and additional penalties or fines, including recovery of costs for compensatory damages. The Environmental Division investigates and tracks all storm water violations which are then tracked on the Environmental Division server. The most common violations were over watering, wash water, excessive trash or sediment, and leaking auto fluids. The City's <i>Urban Runoff Management and Discharge Control Ordinance</i> establishes minimum BMP requirements for the following residential activities: 1) motor vehicle and boat repair and maintenance; 2) motor vehicle washing; 3) motor vehicle parking; 4) home and garden care activities and product use; 5) home care and maintenance; 6) manure and pet waste management; and 7) private sewer laterals and on-site waste water systems.	Enforce minimum BMPs and track violations

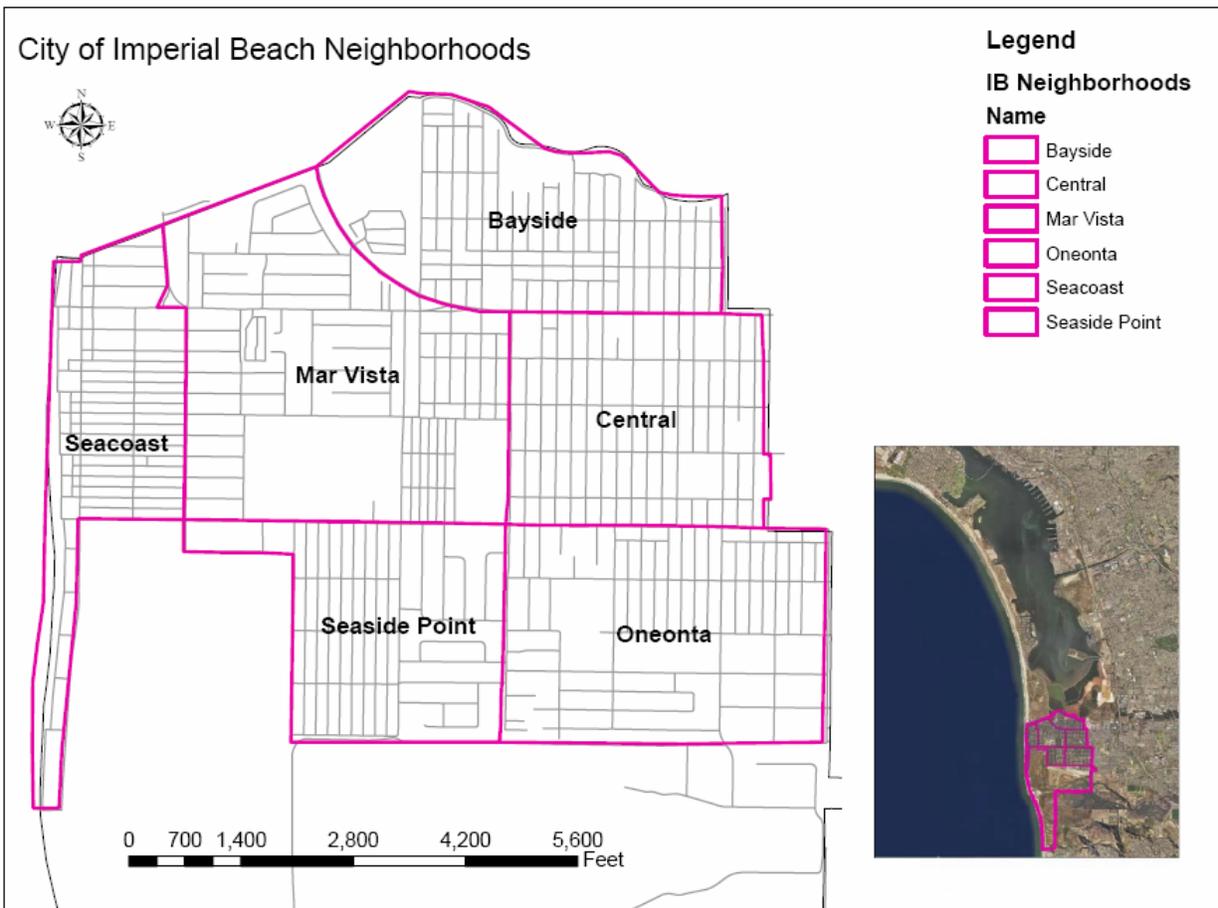
Table 6.2 – Targeted Outcomes and Results for the Residential Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
B. PET WASTE MANAGEMENT ACTIVITIES				
Not targeted or assessed	10 pet waste bag dispensers are maintained by the Ocean Blue Foundation	---	The pet waste bag dispenser program is maintained and operated by the Ocean Blue Foundation, a local not for profit group. The City works with the Ocean Blue Foundation to ensure that the pet waste bag dispensers are maintained and the program has adequate funding.	Not targeted
C. PUBLIC SERVICE REQUESTS				
Respond to public service requests and reports of storm water violations	Responded to 15 storm water Hotline calls and 40 storm water violations reports from municipal staff	Complete	The City does not currently track public service requests for residential areas and activities. The City does track reports for storm water violations. The City received 15 reports on the Storm Water Hotline (619-424-4095) for storm water violations in residential areas. The Environmental Division responded to another 40 residential violations reported by City staff. The City also operates an online complaint form that does not get utilized very often.	Respond to public serve requests and storm water violations
D. CLEANUP ACTIVITIES				
Not targeted	---	---	The City does not currently consider Level 3 assessment of cleanup activities to be applicable or feasible.	Not targeted
LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM THE RESIDENTIAL COMPONENT)				
A. HOUSEHOLD HAZARDOUS WASTE (HHW) COLLECTED				
Not targeted	5,762 pounds of HHW collected	---	The City's HHW disposal program is available to all residents, and the City partners with other jurisdictions in the South Bay to offer convenient, low-cost HHW disposal options.	Not targeted
B. USED OIL COLLECTED				
Not targeted	2,172 pounds of Reclaimable (Antifreeze, Car batteries, Latex	---	The City is required to facilitate the proper management and disposal of used oil, toxic materials, and other HHW through educational and public information activities, and establishment of collection sites operated by the City or a private entity.	Not targeted

Table 6.2 – Targeted Outcomes and Results for the Residential Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
	Paint, Used Oil and filters) collected			
C. UNIVERSAL AND ELECTRONIC WASTE COLLECTED				
Not targeted	2,433 pounds of electronic and universal waste collected	---	The City facilitates the proper management and disposal of universal and electronic wastes.	Not targeted
D. PET WASTE COLLECTED				
Not targeted	10 pet waste bag dispensers; 72,800 bags replaced, and an estimate of 18,200 lbs of pet waste collected	---	The pet waste bag dispenser program is maintained and operated by the Ocean Blue Foundation, a local not for profit group. The City works with the Ocean Blue Foundation to ensure that the pet waste bag dispensers are maintained and the program has adequate funding. If the average pet waste weighs 4 ounces then an estimate of 18,200 lbs of waste was collected.	Not targeted
E. SPECIAL EVENT RECYCLING AND WASTE MANAGEMENT				
Not targeted	93 participants in annual Garage Sale; 732 participants in the annual Home Front Clean Up	---	The City holds an annual Citywide Garage Sale followed the next weekend by the annual Home Front Cleanup event for the purpose of facilitating reuse and the proper disposal of waste materials. The Home Front Clean Up had 732 participants and disposed of 154.3 tons of trash, construction, metals, and green waste.	Not targeted

Figure 6.2 High Priority Residential Neighborhoods



7.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION COMPONENT

7.1 Introduction

The City endeavors to prevent municipal discharges from the Municipal Separate Storm Sewer System (MS4) from causing or contributing to a violation of water quality standards. This component is primarily applicable to the Environmental Program Division of the Department of Public Works and its efforts to reduce municipal discharges of pollutants to the MS4 to the maximum extent practicable (MEP).

All components of the JURMP are represented in this report with the exception of this component. The San Diego Regional Water Quality Control Board adopted Addendum No. 2 to Order No. R9-2007-0001 (Municipal Permit), extending the annual reporting deadline associated with this component from September 30th to December 15th. This change was necessary because the program involves water quality monitoring during the dry season, defined as May 1st through September 30th, which does not allow for proper time in which to report and convey information on the dry season as a whole.

The City's implementation and assessment strategy for the illicit discharge detection and elimination component is described in the *JURMP Section 9.0*.

8.0 EDUCATION COMPONENT

8.1 Introduction

The City endeavors to implement a diverse education program in the community to reduce the impacts of urbanization on water quality. Education activities are targeted at the following groups: 1) municipal departments and personnel, 2) construction site owners and developers, 3) commercial business owners and operators, 4) industrial business owners and operators (none exist in the City of Imperial Beach), 5) residents, general public, and school children, and 6) underserved community. This component is applicable to all City departments, in particular the Environmental Program Division of the Department of Public Works, which spearheads the City's education efforts and is responsible for the annual training for municipal employees on the components and goals of the JURMP. This section of the Annual Report discusses program implementation and changes made to the Education Component as it relates to management program activities and outcomes targeted for staff implementing control measures. Note that each section of this JURMP Annual Report already includes a description of education activities for each element. The City recognizes the importance education plays in facilitating the necessary behavioral changes to successfully reduce and eliminate pollutants from urban runoff.

8.2 Level 1 Outcomes – Management Program Activities

8.2.1 Program Planning and Administration

The Program Planning and Administration element of the Annual Report addresses modifications to the JURMP, updates to program documentation and training content and materials. It also addresses a review and update of the program including inventories for the next fiscal year.

The City's implementation and assessment strategy for the Education Component is described in the *2008 JURMP Section 10.0*. During FY 2008-09 the City made no significant updates to the education program. The City continues to focus education efforts at the five targeted community groups. The City tailors each individual education activity to best suit the message and content for the target community; however, the overall message is consistent with the *2008 JURMP Section 10.0*. Minor changes to the program include changes to materials such as handouts, surveys, and swag, which are continuously updated throughout the year. The City also actively seeks for ways to expand and improve the effectiveness of the education program. For example the City started a new education campaign for resident to adopt the use of reusable bags. The City is also looking for ways to expand the education program by developing education partnerships with existing groups in the community. New education partnerships are being explored with the YMCA Surf Camp, Fish and Wildlife Service, and

Tijuana Estuary. Figure 8.1 provides an overview of the major elements of this strategy as it was implemented during FY 2008-09.

8.2.2 Management Program Implementation

The Management Program Implementation element of the Annual Report addresses JURMP requirements, training and education activities, public awareness and response, and surveys and special investigations.

The Environmental Division oversaw the implementation of the Education Component during FY 2008-09. The City successfully achieved the JURMP requirement and provided education for the six targeted communities. Table 8.1 provides an overview of the education efforts during this reporting period. Table 8.2 also presents and describes targeted FY 2008-09 outcomes and results, as well as implementation targets for FY 2009-10. Additional documentation, analysis, and discussion are provided in Table 8.3.

8.3 Outcomes Targeted for Staff Implementing Control Measures

8.3.1 Outcome Level 2 – Knowledge and Awareness

A training program has been implemented within the City to inform employees of the components and goals of the 2008 JURMP. The training program focuses on the use of Best Management Practices in daily operations, and designed to create an overall sensitivity to pollution prevention concerns. Open discussions are encouraged to further the importance and enhance the program. This education effort is discussed in the *2008 JURMP Section 10.0*.

The City is required to implement an education program for each target community using all media as appropriate to 1) measurably increase the knowledge of the target communities regarding MS4s, impacts of urban runoff on receiving waters, and potential BMP solutions for the target audience; and 2) to measurably change the behavior of target communities and thereby reduce pollutant releases to MS4s and the environment. During FY 2008-09 the City started implementing pre and post tests and surveys in attempts to capture changes in knowledge and awareness. A description of these efforts is captured in Table 8.2 with additional documentation, analysis, and discussion provided in Table 8.3.

8.3.2 Outcome Level 3 – Behaviors and Best Management Practice (BMP) Implementation

The *2008 JURMP Section 10.0* defines requirements to educate each target community on the laws, regulations, permits, requirements, BMPs, general urban runoff concepts, and other topics where appropriate. Education is the largest mechanism the City uses to facilitate changes in behavior and implementation of BMPs. Each chapter presented in this Annual Report touches on how changes in behaviors and implementation of BMPs were achieved.

8.3.3 Outcome Level 4 – Source Load Reductions

The City encourages the use of pollution prevention methods by the target audiences; however, source load reductions for education are not targeted or assessed.

Management Program Activities		Outcomes Targeted for Staff Implementing Control Measures		
Outcome Level 1a	Outcome Level 1b	Outcome Level 2	Outcome Level 3	Outcome Level 4
1.A. Program Planning and Administration	1.B. Management Program Implementation	Knowledge and Awareness	Behaviors and BMP Implementation	Source Load Reductions from Municipal Facilities
1. FY 2008-09 Program Updates <ul style="list-style-type: none"> ▪ Modifications to JURMP ▪ Updates to program documentation ▪ Updates to training content & materials 2. Program Review and Update <ul style="list-style-type: none"> ▪ Year-end program review ▪ Updated outreach materials 	1. Jurisdictional Requirements for Minimum BMPs 2. Municipal Staff Training 3. Maintenance Inspections 4. Stormwater Hot Line Operation (619-424-4095) 5. Surveys and Special Investigations	A. Illicit Discharge Reporting <i>Not targeted or assessed</i> B. Core Concepts for Municipal Staff C. Implementation Responsibilities <i>Not targeted or assessed</i>	A. Municipal Departments and Personnel B. Construction Site Owners, Contractors, and Developers C. Industrial and Commercial Site Owners and Operators D. Underserved Community E. Residential Community, General Public, and School Children	<i>Not targeted or assessed</i>

Figure 8.1 – FY 2008-09 Implementation and Assessment Strategy for the Education Component

Table 8.1 – Overview of Education

Category	Number	Description
A. Educational Efforts		
Municipal Departments and Personnel Events	5	Employees are trained annually on the use of BMPs in their daily operations. Face-to-face meetings are held on a regular basis with employees to discuss the JURMP and its application in their operations.
Construction Site Owners, Contractors and Developer Training Events	2	Construction Site Owners, Contractors and Developers are trained through face-to-face meetings with the Community Development Department and the Public Works Department during the permitting process, in inspections, and in investigations of illegal discharges.
Industrial Site Owners and Operators Training Events	---	Commercial Site Owners and Operators are trained through scheduled inspections by the Public Works Department Environmental Division, and through investigations of illegal discharges.
Commercial Site Owners and Operators Training Events	4	All residents receive educational information in the City's newsletter, a newsletter sent out by the City's waste franchisee, website updates, materials provided at City Hall and the Public Works Department, through community presentations, etc. The City held an information booth at the U.S. Open Sand Castle competition and Auto Show. The City also participated with other Co-Permittees in regional outreach events that target the underserved community.
Residential Community and General Public Outreach Events	10	
Underserved Community	1	
School Children Outreach Events	6	
JURMP Sections	Description of FY 2008-09 Changes	
10.0 and Appendix I	BMP requirements of the JURMP applicable to educational areas and activities were modified in accordance with the requirements of the updated Permit in March 2008.	

Table 8.2 – Targeted Outcomes and Results for the Education Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
LEVEL 1 OUTCOMES (MANAGEMENT PROGRAM ACTIVITIES)				
A. PROGRAM PLANNING AND ADMINISTRATION				
1. FY 2008-09 PROGRAM UPDATES				
a. MODIFICATIONS TO JURMP				
Update applicable JURMP sections per new Permit requirements	No updates made during FY 2008-09	Complete	Applicable updates were included in 2008 JURMP Section 10.0, submitted to the RWQCB on 03-24-08.	Not targeted
b. UPDATES TO PROGRAM DOCUMENTATION (POLICIES, PLANS, PROCEDURES, GUIDELINES, AND FORMS)				
Update educational efforts for consistency with program updates	Minor updates made to program	---	The City started implementing surveys when feasible at education events to establish a baseline level of knowledge. Minor program updates are also made throughout the year to program content to most effectively present education materials.	Update and/or develop educational efforts for consistency with program updates
c. UPDATES TO TRAINING PROGRAM				
Update staff training materials for consistency with 2008 JURMP Section 10.0	Made updates to presentation and survey	Under review	The City makes annual updates to training content and materials so that each education activity provides appropriate information for the target audience.	Update staff training materials for consistency with 2008 JURMP Section 10.0
2. FY 2008-09 PROGRAM REVIEW AND UPDATE				
a. YEAR-END PROGRAM REVIEW				
Complete annual year-end program	Review underway	In progress	An annual program review for the Education Component is underway during the development of this JURMP Annual Report. The City continues to improve the implementation of the JURMP by	Complete annual year-end program

Table 8.2 – Targeted Outcomes and Results for the Education Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
review			conducting an annual review of each component and incorporating any modifications into the next reporting period.	review
b. UPDATED OUTREACH MATERIALS				
Update outreach materials	Updates made to BMP practices for your Business brochure	In progress	The City is updating and developing new outreach materials for each target community.	Update outreach materials
B. MANAGEMENT PROGRAM IMPLEMENTATION				
1. Jurisdictional Designation of Minimum BMPs				
Require minimum BMPs	Requirements implemented	Complete	All components of the JURMP have the requirement to implement measures to reduce pollutants and runoff to the MEP.	Require minimum BMPs
2. Municipal Staff Training				
Provide training for FY 2008-09	Training provided to Community Development Department 9/23/08 and Public Works Department 9/17/08 and during indoctrination of new employees	Complete	The Environmental Division provides annual training to all City Departments as well as during the indoctrination of new employees. Daily interactions with City staff ensure that storm water pollution prevention remains a high priority throughout the City.	Provide training to all staff with identified responsibilities
3. Storm Water Hotline Operation				
Operate a hotline to provide the public opportunities to report illegal storm water	Hotline operated throughout reporting period	Complete	A Storm Water Hotline (619-424-4095) was operated throughout FY 2008-09 to provide the public a means of reporting storm water violations in City-maintained roadways and the MS4.	Operate a storm water hotline

Table 8.2 – Targeted Outcomes and Results for the Education Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
discharges				
4. Surveys and Special Investigations				
Provide a survey to municipal staff	Administered a survey to municipal staff as part of annual training program	Complete	Training was conducted on 9/23/08 for the Community Development Department and 9/17/08 for the Public Works Department on the necessary elements of this component. A survey was provided to establish a baseline of knowledge. The City incorporates surveys or pre and post tests into training programs and administers them when appropriate.	Survey municipal staff to ascertain baseline knowledge of storm water program
LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY STAFF)				
Establish a baseline of staff knowledge regarding applicable program content	Performed a survey on 9/23/08 of Community Development and 9/17/08 of Public Works Department as part of annual training.	Survey consisted of a 16 question test. The results are as follows: Community Development Department (12 surveys completed) and average score 89%. Public Works Department (23 surveys completed) and average score 81%.	Training was conducted on 9/23/08 for the Community Development Department and 9/17/08 for the Public Works Department on the necessary elements of this component. The survey administered during the training session provides a baseline of knowledge of core concepts and helps refine training programs for the next reporting period. The City incorporates surveys or pre and post tests into training programs and administers them when appropriate. Results from this reporting period indicate that the Community Development Department has a greater level of knowledge on core concepts of the storm water program than the Department of Public Works. The overall results still show a high level of knowledge on core storm water management concepts in the City.	Survey municipal staff to assess knowledge of storm water program
LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY STAFF AND TARGETED AUDIENCES)				
A. MUNICIPAL DEPARTMENTS AND PERSONNEL				
Not targeted or assessed	---	---	The City does not currently consider Level 3 assessment of education activities to be applicable or feasible.	Not targeted

Table 8.2 – Targeted Outcomes and Results for the Education Component

FY 2008-09 Results				FY 2009-10 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
B. CONSTRUCTION SITE OWNERS AND DEVELOPERS				
Not targeted or assessed	---	---	The City does not currently consider Level 3 assessment of education activities to be applicable or feasible.	Not targeted
C. COMMERCIAL AND INDUSTRIAL SITE OWNERS AND OPERATORS				
Not targeted or assessed	---	---	The City does not currently consider Level 3 assessment of education activities to be applicable or feasible.	Not targeted
D. UNDERSERVED COMMUNITY				
Not targeted or assessed	---	---	The City does not currently consider Level 3 assessment of education activities to be applicable or feasible.	Not targeted
E. RESIDENTIAL COMMUNITY, GENERAL PUBLIC, AND SCHOOL CHILDREN				
Not targeted or assessed	---	---	The City does not currently consider Level 3 assessment of education activities to be applicable or feasible.	Not targeted
LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM EDUCATIONAL ACTIVITIES)				
Not targeted or assessed	---	---	The City does not currently consider Level 4 assessment of education activities to be applicable or feasible.	Not targeted

Table 8.3 FY 2008-09 Jurisdictional Education Activities

Education Activity	Date	Activity or Event Description	Topics	Participants
Municipal Departments and Personnel				
Public Works Department Training	9/17/2008	Annual municipal training	JURMP Components	23
Community Development Training	9/23/2008	Annual municipal training	JURMP Components	12
SUSMP Workshop	6/1/2009	Model SUSMP Workshop	Implementation of Model SUSMP	5
New Employee Training	On going	Indoctrination of new employees on storm water program	Storm water program	4
City FYI articles	On going	10 different FYI articles	Storm water pollution prevention on various topics	200+ each article
Construction Site Owners and Developers				
Copy of storm water/grading/erosion control requirements attached to Imperial Beach issued permits	On going	Community Development Department disseminates BMP and storm water information with permits	BMP, pollution prevention, City storm water requirements	---
Community Development counter hours	On going	Counter hour for education relating to construction and development in the City	BMPs, pollution prevention, City storm water regulations	---
Commercial Owners and Operators				
Sand Castle vender packed and inspections	7/16th-20th/2008	Provided education materials for street vendors and conducted commercial inspections during event	Mobile business, pollution prevention recycling	54
Commercial Inspection	On going	Commercial business inspections	Pollution prevention, BMPs, storm water regulations	50
Follow up inspection report and letter	On going	Each commercial inspection is followed up with summary report and BMP brochures by mail	Commercial BMPs, recycling and pollution prevention	50
Residents and General Public				
Annual Home Front Clean up	5/2/2009	Large bulky item collection at Mar Vista HS	Recycling, reuse, pollution prevention	689
Citywide Garage Sale	4/25/2009	City promotes reuse of materials through a one day Citywide garage sale event	Reuse and public participation	93
Day Without a Bag	12/15/2008	City partnered with local businesses to promote "Day without a plastic bag".	Reuse and pollution prevention	---
City of Imperial Beach storm water booth at U.S. Open Sand Castle competition	7/19th-20th/2008	City booth for storm water and pollution prevention	Pollution prevention, HHW, recycling, and storm water regulations	300,000

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Education Activity	Date	Activity or Event Description	Topics	Participants
City of Imperial Beach storm water booth at Auto Show	7/26/2008	City booth for storm water and pollution prevention	Pollution prevention, HHW, recycling	1,000
City Semi-Annual news letter	Bi-annually	Summer and Winter City news letter sent to all residents	Pollution prevention, storm water BMPs, Recycling	27,000
EDCO Environmental Times	Quarterly	Summer , Fall, Winter, and Spring news letters sent to all residents	Pollution prevention, HHW, recycling, and storm water regulations	27,000
Eagle and Times newspaper	7/9/08; 11/1/08; 12/15/08; 4/1/09; 5/10/09	Articles on variety of topics advising the community on storm water related issues	Storm water pollution, reusable bag day, pollution prevention, City pollution prevention efforts	Citywide newspaper
Coastal Clean Up Day	4/25/2009	7th Annual Creek to Bay Clean Up sponsored by ILACSD	Pollution prevention	4,000
Website	On going	Information about storm water program, recycling, and online reporting	Pollution prevention, storm water BMPs, Recycling	---
Underserved Community				
Underserved Target Audience Sub-workgroup	On going	Co-chair of Education Residential Sources Workgroup, Chair of Underserved Target Audience sub-workgroup	Regional education materials and activities for the underserved community	---
School Children				
Central Elementary 5th and 6th Grade presentations	6/16/2009	Three presentation for 5th and 6th graders at Central Elementary School by ILACSD	Presentation on storm water pollution, pollution prevention, BMPs, watersheds	100
Imperial Beach Elementary 5th Grade presentations	5/20/2009	Three presentation for 5th Graders at Imperial Beach Elementary School by ILACSD	Presentation on storm water pollution, pollution prevention, BMPs, watersheds	54

9.0 PUBLIC PARTICIPATION COMPONENT

9.1 Introduction

The City is required to incorporate a mechanism for Public Participation in the updating, development, and implementation of the JURMP. In working with the public, the City gains a better understanding of public perception and attitudes towards the problem of storm water pollution. The implementation of the 2008 JURMP naturally includes an element of public participation. The Environmental Division of the Department of Public Works regularly interacts with residents, commercial businesses, municipal staff, and developers while conducting inspections, education activities, BMP enforcement, and other JURMP implementation components. The City also makes additional efforts to include public participation in the implementation and development of the JURMP. These efforts are discussed below.

9.2 Public Participation Efforts

The City holds a public hearing and solicits public comments prior to the adoption and submittal of the JURMP and its Annual Reports. The public was notified on this Annual Report in the Imperial Beach *Eagle & Times* and *Union Tribune* newspapers and through public hearing notices that were posted at City Hall and the Imperial Beach Public Library. A draft of this JURMP Annual Report was made available for public viewing at the Imperial Beach City Hall, posted on the City's website, and presented at a public hearing to City Council on September 2, 2009.

Other public participation mechanisms the City uses include the operation of a storm water hotline and online reporting tool to report violations, coordination of cleanup activities such as the pet waste bag program and trash clean ups with local organizations, involvement with local environmental groups to spread awareness of urban runoff pollution, participation with civic organizations, City special events; and the City Hall xeriscaping Eagle Scout projects.

10.0 FISCAL ANALYSIS COMPONENT

10.1 Introduction

The Environmental Program Division of the Department of Public Works is responsible for the fiscal analysis of the storm water program. Implementation costs for the JURMP are approximately \$1,000,000. Revenue sources used by the City to fund the storm water program include a solid waste fee for storm water management services, sewer enterprise funds, building permit fees, State grants, and City Redevelopment Agency funds.

10.2 General Budget Information

The costs of implementing the JURMP are spread across the whole City. Each Department and associated Division has an established role in implementing the components of the JURMP. However, the primary responsibility of implementing the storm water program is split between the Department of Public Works and Community Development Department.

10.3 Fiscal Analysis Methods

The Standardized Fiscal Analysis Methods and Format (Fiscal Analysis Methods) were collaboratively developed and adopted by the Copermitttees in January 2009 in accordance with sections G, J.1.a(3)(k), and J.1.c(1)(d) of NPDES Order No. R9-2007-0001. The Fiscal Analysis Methods document was submitted to the San Diego RWQCB by January 31, 2009, as Attachment 1 of the Regional Urban Runoff Management Plan (RURMP) Annual Report for 2008-2009. The Standardized Fiscal Analysis Methods will be worked into FY 2009-10 Annual Report for next reporting period.

10.4 Fiscal Analysis Results

10.4.1 Expenditures

Detailed analysis of expenditures is currently underway and will be provided in the next Annual Report for FY 2009-10.

10.4.2 Funding Source

Revenue sources used by the City to fund the requirements of the Municipal Permit include a solid waste fee for storm water management services, sewer enterprise funds, and building permit fees. Other storm water pollution prevention projects were funded from State Clean Beaches Initiative funds and the City Redevelopment Agency funds.

11.0 PROGRAM EFFECTIVENESS ASSESSMENT

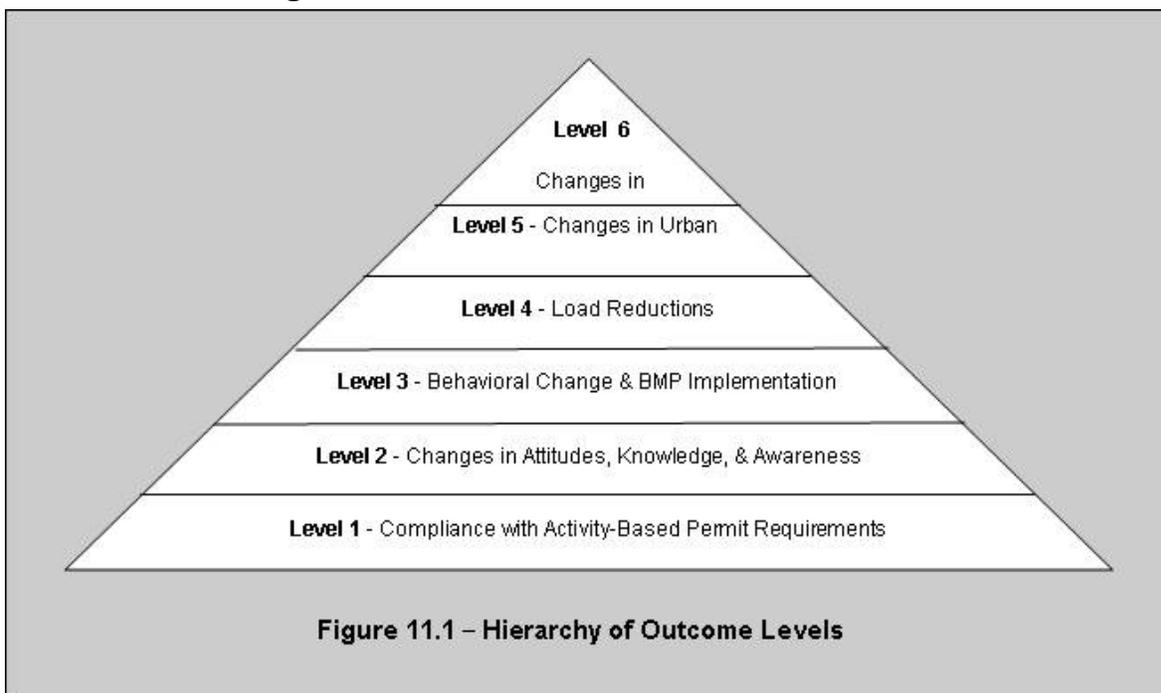
11.1 Introduction

The Environmental Program Division of the Department of Public Works is responsible for the assessment of the JURMP for effectiveness. Each jurisdictional activity/BMP implemented for each major component of the 2008 JURMP is assessed to indirectly gauge whether the processes and procedures put into place are working toward protecting the quality of receiving waters.

The structure of this Annual Report evaluates the level of effectiveness for each JURMP component in the context of program planning, management, and implementation. The City uses the structural hierarchy of levels that were established in the 2003 *Framework for Assessing the Effectiveness of Jurisdictional Urban Runoff Management Programs*. Within each section of this Annual Report the City assesses program effectiveness on Outcome Level 1- Outcome Level 4. The hierarchy of outcomes is shown graphically in Figure 11.1.

In general, Outcome Levels 1, 2, and 3 can be addressed on a Jurisdictional scale. Some Outcome Level 4 measurements of load reductions can be addressed at this scale, but for the most part, assessment of changes to water quality (Levels 4, 5, and 6) are best addressed at the watershed or regional scale. The City therefore only assesses program effectiveness on Outcome Level 1 through Outcome Level 4.

Figure 11.1 – Effectiveness Outcome Levels



11.2 Level 1 Outcomes – Management Program Activities

11.2.1 Program Planning and Administration

Program Planning and Administration addresses modifications to the 2008 JURMP, updates to program documentation and training content and materials within each element of this Annual Report. It also addresses a review and update of the program including inventories for the next fiscal year.

The City's implementation and assessment strategy for the program effectiveness is described in the *JURMP Section 13.0*.

11.2.2 Management Program Implementation

Management Program Implementation addresses requirements, training, inspections, public awareness and response, and surveys and special investigations for each component of the 2008 JURMP within each element of this Annual Report. The tables in each section of the Annual Report present and describe targeted FY 2008-09 outcomes and results, as well as implementation targets for FY 2009-10 that are funded by the program.

11.3 Outcomes Targeted for Staff Implementing Control Measures

11.3.1 Outcome Level 2 – Knowledge and Awareness

Knowledge and awareness are targeted and assessed as necessary within each element of this Annual Report independently.

11.3.2 Outcome Level 3 – Behaviors and Best Management Practice (BMP) Implementation

Behaviors and BMP implementation are assessed within the tables located in each section of this Annual Report.

11.3.3 Outcome Level 4 – Source Load Reductions

Source load reductions are targeted and assessed as necessary within each element of this Annual Report independently.

12.0 Special Investigations

12.1 Introduction

This section describes special investigations that were conducted above and beyond Permit requirements, but with the ultimate goal of better understanding and controlling urban runoff and storm water pollution. Surveys and special investigations relevant to each JURMP component are assessed in the tables of each section of this Annual Report. The discussion presented in this section provides additional details on the special investigation for the Palm Avenue Low Flow Urban Runoff Diverter and the Tijuana River Bacterial Source Identification Study, both of which were funded under Clean Beach Initiative (CBI) grants.

12.2 Palm Avenue Low Flow Urban Runoff Diverter

In January 2009 the Palm Avenue Low Flow Urban Runoff Diverter became operational. The diverter project, which was mostly funded under a Prop 50 CBI Grant, diverts nuisance flow urban runoff and first-flush rain water into the sanitary sewer. The Palm Avenue diverter is fed by four curb inlets and 15 grated drains. The inlets drain approximately 72.1 acres of residential and light commercial land uses. Prior to the construction of the Palm Ave Diverter, all flows from these inlets discharged directly onto the beach. Operating at maximum capacity, the Palm Ave diverter can divert flows up to 250 gallons per minute into the sanitary sewer.

As part of the condition on the Grant, the City is conducting weekly post construction water quality monitoring for a one year period from January 2009 through December 2009. Samples are analyzed for bacteria, temperature, pH, conductivity, and field observations. The volume of diverted runoff is also being tracked. During the first 6 months of monitoring, 192,000 gallons of urban runoff was diverted into the sanitary sewer and prevented from flowing to the Pacific. Results from the weekly bacterial analysis also revealed elevated levels of bacteria in the diverted flows. Compared to AB411 monitoring action levels, 85% of the samples were in exceedance of enterococcus and 100% of the samples were in exceedance of total coliform bacteria.

The initial data from the post construction monitoring of the Palm Ave Diverter project confirms the same results from the previously completed monitoring from the Date Ave Diverter in 2004. The results show that the coastal drainage areas have persistently high levels of bacteria in the urban runoff, which could have contributed to the high levels of bacteria observed off the coast. With the completion of the Palm Avenue Diverter project and the continued operation of the Date Avenue Diverter, the vast majority (137.2 acres) of the low flow urban runoff is diverted before reaching the beach. The only coastal outfall in Imperial Beach not on a diverter system is at the Ebony Street end, which consists of a 12 inch outfall and drains a residential area of 2.2 acres.

12.3 Tijuana River Bacterial Source Identification Study

During this reporting period, the City with funding from a Proposition 50 Clean Beach Initiative (CBI) Grant, initiated a source identification survey to identify sources of bacterial contamination in the U.S. portion of the Tijuana River Watershed. The purpose of the study is to contribute to the regional efforts to identify domestic sources of bacterial contamination and recommend appropriate actions and activities to reduce the input of those sources to the Tijuana River and adjacent Pacific Ocean.

In October 2008 the first sanitary survey was complete and the project was on track to perform the dry and wet weather components of the study. Unfortunately, on December 22, 2008 the City was notified that the State Water Board would not be processing invoices for the period of December 15th onward. After discussions with the State Water Board and the contractors, further work on the project was limited to administration and maintenance until the matter could be resolved. During the first quarter of 2009 the State budget situation did not improve and starting April 1, 2009, the Tijuana River Source Identification Study was put permanently on hold until funding for the CBI Grant is restored. As of this Annual Report, CBI Grant funds and project work are still on hold.

13.0 Non-Emergency Fire Fighting

13.1 Introduction

The City requires pollution prevention measures and BMPs to reduce or eliminate non-emergency fire fighting flows. The Environmental Division assists the Fire Department in implementing control measures to prevent or control pollutants from both emergency and non-emergency fire fighting activities. The *2008 JURMP Section 2.2* identifies the BMPs that are implemented as part of fire fighting activities.

Non-emergency fire fighting activities, such as training activities that simulate emergency responses, are performed in a manner that eliminates discharges to the storm water system whenever practicable, and minimizes discharges to the storm water conveyance system when elimination of discharges is practicably unavoidable. The following best management practices are implemented as part of these activities:

- Water flows are directed to landscaped areas whenever possible
- When flowing water to an area where landscaping does not prevent runoff, the area selected shall be surveyed by the Officer in charge prior to training activities to ensure that debris will not enter into the storm water system as a result of the drill
- Areas that have debris, which could potentially enter the storm water system as a result of the drill activities, will not be used for training until debris has been removed. Referrals to the Department responsible for the debris removal will be made as needed
- Live fire training activities will be pre-planned to allow integration of barriers to off-site runoff, which could contribute to storm water discharges
- Discharges from maintenance of equipment and restoration of hoses, vehicles, tools, ladders and other emergency response equipment are directed to the sewage, and dry methods are used whenever practical
- Staff is trained on good housekeeping practices to be used during standard facility maintenance procedures
- The fire fighting personnel and inspectors receive annual pollution prevention training
- Vehicle washing or equipment cleaning is conducted over a wash bay that drains to the sewer

14.0 JURMP Revisions

14.1 Introduction

The Environmental Program Division of the Department of Public Works is responsible to maximize program effectiveness by identifying and describing any JURMP modifications that are made during the reporting period, or that are proposed or planned for the next reporting period. Under the reporting format of this Annual Report, any modification or proposed changes made to the *2008 JURMP* are identified in the Program Planning and Administration subsection within each preceding Section of this report.

15.0 Conclusions and Recommendations

15.1 Introduction

The City made great progress in further developing and refining its urban runoff and management program during FY 2008-09. The management programs and activities implemented by municipal staff demonstrate a high level of compliance with the regulatory mandates of the Municipal Storm Water Permit, and underscore the City's commitment to reducing and eliminating pollutants related to urban runoff. The Components of the JURMP require the City to reduce to the maximum extent practicable sources of pollutants from three distinct phases of urban development: 1) planning and design phase, 2) construction and development phase, and 3) existing development phase. The City's urban runoff management program outlined in this Annual Report successfully meets these regulatory requirements and in some cases exceeds the minimum Permit requirements.

Looking forward to FY 2009-10 and beyond, the City is committed to continuing with many of the programs and management activities described in this report. This Annual Report marks the 8th year of implementation of the San Diego Storm Water Permit and presents a good opportunity to reevaluate and assess the effectiveness of the City's storm water programs. Recommendations for future Reports is to enhance the program's end-of-year review and effectiveness assessment in order to further refine and improve each JURMP Component and to most effectively target sources of pollutants. The JURMP and all the Annual Reports are a living document that evolve over time and build upon the success and sometimes failure of management program activities. The City endeavors to implement the most effective storm water program possible, building upon the existing program, and given the resources that are available to the City.