



2009-2010 JURMP Annual Report

City of Imperial Beach

9/14/2010

This Jurisdictional Urban Runoff Management Plan Annual Report contains a comprehensive description of the activities conducted during FY 200910 by the City to meet all requirements of section D of the Municipal Permit R9-2007-0001.

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."

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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, 2009 and June 30, 2010 (FY2009-10).

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 review process. This includes reviewing priority and non-priority development projects for necessary best management practices (BMPs) to manage storm water runoff prior to the issuance of grading or construction permits. 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 51 projects during FY2006-07, 48 projects during FY 2007-08, and 24 projects during FY2008-09.
- No Water Pollution Control Plans subject to the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements were approved during the reporting period. The City has 2 potential SUSMP projects in the planning stage and 4 SUSMP projects that are still going through the plan check process and have not been approved for development.
- Verified operation and maintenance of 22 permanent post construction treatment control BMPs.
- Participated with San Diego Copermittees in the development of the Hydromodification Management Plan (HMP). The Copermittees submitted the Final HMP to the Regional Board on 12/29/09. The HMP Plan received Regional Board revisions, public comments, and Copermittee revisions. The Regional Board is scheduled to vote on the final plan on 7/14/10.
- 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. All construction projects are required to have a City approved Storm Water Management Plan prior to the start of the project. Projects over 1 acre in size are also required to obtain coverage under the State General Construction Permit. Major accomplishments during FY2009-10 included the following:

- Inspected a total of 72 active construction projects including 5 Capital Improvement Projects (CIP) during the reporting period. Approximately 495 inspections were performed to verify the proper installation and maintenance of construction phase BMPs.
- Performed daily oversight of construction BMP compliance at all 5 CIP projects that were in active construction phase.
- Responded to 15 reports of illegal discharges from construction sites. Only 4 notices of violations (NOVs) were issued to achieve compliance. Verbal warnings are usually sufficient to bring violators into compliance.
- Discussed urban runoff management requirements with all applicants during the plan check process and verified BMP requirements during follow-up inspections.

Municipal Component

City employees continued to implement best management practices (BMPs) to prevent the discharge of water and pollutants from municipal facilities and activities. Examples of BMPs implemented during the reporting period include:

- 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 FY2009-10 include:

- Inspected and cleaned 100% of municipal storm drain system and removed 8,230 pounds of sediment, trash, and organic materials through storm drain cleaning.
- Removed an additional 177 tons of material through frequent street sweeping.
- Continued maintenance of the 10th St. and Imperial Beach Blvd. vortech storm water interceptor to remove sediment, floating hydrocarbons, and debris from all levels of flow.
- Quarterly maintenance of 13 municipal storm drain filter inserts that prevented 852 pounds of material from getting into the storm drain system.
- Continued operation of the Date Avenue urban runoff diversion system, which diverts nuisance runoff to the sanitary sewer during low-flow conditions.
- Continued operation of the Palm Avenue urban runoff diversion system at Seacoast Avenue and diverted 156,000 gallons of urban runoff and first flush rain water into the sanitary sewer.
- 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 71 inspections at high priority businesses, which include automotive repair shops, restaurants, bars, gas stations, car washes, grocery stores, and mobile home parks. This is 21 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 26 enforcement actions at businesses and issued 6 notices of violation as part of the enforcement and case resolution process. The City also conducted 9 follow up inspections as part of the annual storm water inspection program
- The City participated with the Copermittes in the Regional online mobile business database tracking system that became operational this reporting period. The database tracks active

mobile businesses and violations issued by other jurisdictions. The City also notified 46 mobile businesses of minimum BMP requirements through an educational mailer.

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 94 residential violations. The most commonly observed violations involved construction debris, automotive fluids, wash water, detergents or chemicals, chlorinated swimming pool water, and green waste.
- Issued 24 notices of violations 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 10,337 pounds of household hazardous waste, universal and e-waste, and 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 175.6 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. The City facilitates changes in behavior and implementation of BMPs by providing continuous education for each target audience using a variety of educational tools and media. The continual saturation of education for each target audience is gradually leading to a greater awareness about storm water pollution and the implementation of pollution prevention BMPs.

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 annual reporting process is used to evaluate the overall effectiveness and efficiency of program elements. The reporting period for the Annual Report is the previous fiscal year July 1st to June 30th.

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). 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.

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 management, implementation, and changes made during FY 2009-10 to the JURMP Development Planning Component.

2.2 Outcome Level 1a: Administration of Management Program Activities

The City's implementation and assessment strategy for the Development Planning component is described in the *2008 JURMP Section 4.0*. This section has been updated to include the implementation of the Countywide Model SUSMP into the operations of the City. Municipal Code Chapter 8.32 was amended on February 3, 2010 to include the new requirements of the Model SUSMP. In addition, 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.

2.3 Outcome Level 1b: Implementation of Management Program Activities

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 2009-10 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. Finally, the City participated in the development of the Hydromodification Plan (HMP) through the Copermittee Land Development Workgroup.

The following tables and figures presented in this section provide additional information on the implementation and assessment of the Development Planning program element:

- Table 2.1 provides an overview of the development and planning projects as it was implemented during FY 2009-10.
- Table 2.2 presents and describes targeted FY 2009-10 outcomes and results
- Table 2.3 provides the updated treatment control BMP inventory.

- Table 2.4 provides an inventory of FY 2009-10 Development Review and SUSMP projects.

2.4 Outcome Level 2: Knowledge and Awareness of Program Implementation by Staff and Developers

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. The 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*.

2.5 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. The County Model SUSMP also requires additional controls for priority development projects.

During FY 2009-10 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.

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.

2.6 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. Source load reductions may not be directly measured but can be implied by the proper implementation and maintenance of storm water BMPs.

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

| Category | Number | Description |
|---------------------------------------|---|--|
| A. Type of Development | | |
| New development | 0 | 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 | 24 | |
| B. Priority Classification | | |
| Discretionary Projects | 18 | No projects received a SUSMP waiver. All SUSMP-eligible projects were subject to applicable requirements. No SUSMP projects were approved for construction during the reporting period. SUSMP projects were either in the planning stage or plan check stage. Permits to begin construction on the six priority development projects will not be issued until acceptable SUSMP and Water Pollution Control Plans have been submitted and approved. |
| Priority Development (SUSMP) Projects | 6 | |
| C. Totals | | |
| Discretionary Projects | 18 | Complete list of development projects that received an environmental review for storm water 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 2009-10 Changes | |
| 4.0 and Appendix C | I.B.M.C. 8.32 Standard Urban Storm Water Mitigation Plan was updated to include the elements of the Countywide Model SUSMP. Updates were made to the Treatment Control BMP inventory and Development Project inventory. | |

Table 2.2 - Development Planning Component Targeted Outcomes and Result

| Development Planning FY 2009-10 Results | | | |
|---|--|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| LEVEL 1a OUTCOMES (ADMINISTRATION MANAGEMENT PROGRAM ACTIVITIES) | | | |
| a) Modifications to JURMP | | | |
| Update applicable JURMP sections per Permit requirements | Incorporated Model SUSMP into Municipal Code | Complete | Updates made to the Imperial Beach Municipal Code 8.32 on February 3, 2010 to include the elements of the Countywide Model SUSMP. |
| b) Updates to Program Documentation (Policies, Plans, Procedures, and Forms) | | | |
| Update program documentation for consistency with program updates | City project review procedures were updated as a result of the SUSMP | Complete | Updates made to Imperial Beach Municipal Code 8.32 to include the requirements of the SUSMP. The City is also looking into updating its Environmental Review forms (7-A and 7-B) and updating guidance documents to include further guidance for SUSMP, HMP, and General Construction Permits. |
| c) Year-End Program Review | | | |
| Complete annual year-end program review | Reviewed program for effectiveness and efficiency | Complete | 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. |
| d) Inventory of Development and Redevelopment Projects | | | |
| Update development and redevelopment inventory | Updates made to the inventory throughout the reporting period | Complete | The City maintains a database of active development projects and development review status on the City's database system HTE. Annual inventories are also maintained in excel with the Environmental Division. |

Table 2.2 - Development Planning Component Targeted Outcomes and Result

| Development Planning FY 2009-10 Results | | | |
|---|--|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| e) Inventory of Treatment Control BMPs and Maintenance | | | |
| Update inventory for treatment control BMPs | Updates made to inventory and maintenance verified | Complete | The Environmental Division maintains an inventory of treatment control BMPs. During this reporting period there were changes made to the inventory layout, property owners, and operation and maintenance of the BMPs. One location was removed from the list (Tunes Lube & Ect.) because the building is in the process of being redeveloped. |
| LEVEL 1b OUTCOMES (IMPLIMENTATION OF MANAGEMENT PROGRAM ACTIVITIES) | | | |
| a) Jurisdictional Requirements for Project Approval | | | |
| Require development projects to implement applicable project requirements, BMPs, and track information | BMPs are required as conditions for all development projects and BMPs are verified through the project application process | 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. SUSMP projects are also required to implement additional storm water management controls and BMPs. SUSMP projects are reviewed by Community Development, Public Works, and contract Engineer BDS for compliance with all storm water regulations. All project applications are tracked through the permit approval process and recorded in HTE, excel databases, and Master File system. |
| b) Confirmation of SUSMP and HMP BMPs | | | |
| Verify that all applicable SUSMP and HMP BMPs are applied to priority projects and that the BMPs are inspected prior to occupancy | All SUSMP eligible projects were held to full SUSMP requirements. No projects required HMP interim criterion. | Complete | Six SUSMP high priority projects were subject to applicable requirements, with no project in active construction phase during this reporting period. Storm water BMPs are reviewed during the plan check process. BMPs are then verified during construction through field inspections. The final sign off on the project is not complete until the City receives a signed maintenance agreement for continuous maintenance of the BMPs from the property owner. |

Table 2.2 - Development Planning Component Targeted Outcomes and Result

| Development Planning FY 2009-10 Results | | | |
|--|---|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| c) Example of a Priority Development Project and SUSMP BMPs | | | |
| List one example of a priority development project that was conditioned to meet SUSMP requirements | Seacoast Inn Redevelopment Project | Complete | The Seacoast Inn redevelopment project is in the final project review stage before demolition and construction begins. The SUSMP component of the project received review and comments from Community Development, Public Works, and contracted engineering firm BDS. The project is required to implement LID, source control, and treatment control BMPs and provide a post construction BMP maintenance agreement. All SUSMP components are required to be shown on the building plans before permits are approved for the project. |
| d) Priority Development Projects implementing BMPs with low removal efficiency rankings | | | |
| Listing and feasibility analysis of SUSMP projects using BMPs with low removal efficiency rankings | No projects implemented BMPs with low removal efficiency rankings | Complete | Development projects are required to implement BMPs that target priority pollutants. The selection of BMPs is verified during the plan check process. The City only allows less efficient BMPs after a feasibility analysis proves there is no better alternative. |
| e) HMP Collaboration | | | |
| Description of HMP development and collaboration | Participated in the development of the Copermittee HMP efforts | Complete | Participated in the development of the Countywide HMP through the Land Development Copermittee Workgroup. The Copermittees submitted the Final HMP to the Regional Board 12/29/09. The HMP Plan received Regional Board revisions, public comments, and Copermittee revisions. The Regional Board is scheduled to vote on the final plan on 7/14/10. |

Table 2.2 - Development Planning Component Targeted Outcomes and Result

| Development Planning FY 2009-10 Results | | | |
|--|---|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| f) Municipal Staff Training | | | |
| Ensure that municipal staff are knowledgeable on storm water BMPs, SUSMP, and HMP requirements | Staff educated through meetings, workshops, and training s | Complete | Community Development and Public Works Departments meet weekly to review critical issues including storm water project development requirements. In addition the Planning Division, Building Division, Code Compliance Division, Redevelopment Division, and Environmental Division all received training outside the City on multiple storm water issues. Training topics include SUSMP, HMP, TMDLs, General Construction Permit, and code enforcement. Daily interaction with City staff ensures that storm water pollution prevention remains a high priority throughout the City. |
| g) Developer Education | | | |
| Provide education for developers | Counters hours held and meetings conducted during project review and throughout project | Complete | The Community Development Department held counter hours, face-to-face meetings, project review meetings, and performed inspections throughout the reporting period. Educational items are also proved online and through brochures. |
| h) Special Investigations | | | |
| Not Targeted | None | None | Special investigations were not conducted in FY 2009-10 and are not routinely conducted as part of the implementation strategy for this program element. |

Table 2.2 - Development Planning Component Targeted Outcomes and Result

| Development Planning FY 2009-10 Results | | | |
|---|---|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY STAFF AND DEVELOPERS) | | | |
| Establish a baseline of staff and developer knowledge regarding applicable program content | Surveys were provided to Community Development staff during the previous two reporting periods. Staff is educated through meetings, workshops, and trainings. | Complete | <p>The City incorporates surveys or pre and post tests into training programs and administers them when appropriate. The surveys administered during training sessions provide a baseline of knowledge of core concepts and helps in refining the municipal training program for the next reporting period. The overall results show a high level of knowledge on core storm water management concepts in the City.</p> <p>Knowledge and awareness of developers is implied through the implementation of appropriate storm water BMPs. Inspections of BMPs by Code Enforcement, Building Division, and Public Works also provides reinforcement on BMP requirements and strengthens knowledge and awareness.</p> <p>Surveys were not conducted in FY 2009-10 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.</p> |
| LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY STAFF AND DEVELOPERS) | | | |
| a) Procedural and Administrative Behaviors | | | |
| Review projects and prescribe necessary conditions of approval and BMPs | 24 projects reviewed for conditions of approval | Complete | <p>The City reviews all proposed projects and ensures that all necessary conditions and BMPs are met. High priority development projects are held to more stringent requirements including SUSMP, HMP, and General Construction Permit.</p> <p>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.</p> |

Table 2.2 - Development Planning Component Targeted Outcomes and Result

| Development Planning FY 2009-10 Results | | | |
|--|---|-------------------|---|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| b) BMP Implementation, Operation and Maintenance | | | |
| Inspect projects for BMP compliance and verify BMP implementation | 24 Projects, including the six SUSMP Projects were reviewed and received conditions All active projects inspected for BMPs | 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. |
| Verify operation and maintenance of treatment control BMPs | 22 out of 22 or 100% compliance. Corrections were made on a voluntary basis without need for administrative enforcement. | Complete | The City annually verifies operation and maintenance of treatment control BMPs to ensure compliance with program. Verification is made through written contact with property owner or manager and followed up with an inspection. At a minimum all high priority treatment control BMPs are inspected for operation and maintenance annually. |
| LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM NEW DEVELOPMENT AND REDEVELOPMENT PROJECTS) | | | |
| a) Treatment Control BMPs | | | |
| Maintenance of treatment control BMPs | 201.51 pounds of material removed from treatment control BMPs | Complete | The City verifies maintenance of treatment control BMPs and when possible tracks the amount of material collected during maintenance activities. |

Table 2.2 - Development Planning Component Targeted Outcomes and Result

| Development Planning FY 2009-10 Results | | | |
|---|---|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| b) Low Impact Development (LID) and Site Design BMPs | | | |
| Implement LID and site design BMPs | No priority development projects were implemented during the reporting period | Complete | During the project review the City requires LID and site design BMPs for high priority projects. Non-priority development projects are required to implement public improvements such as source control BMPs and in some cases engineered LIDs and treatment control BMPs. Load reductions are not tracked but are implied for LID BMPs. |

Table 2.3 - Treatment Control BMP Inventory and Maintenance Tracking

| ID | Type | LOCATION | HU and WATERSHED | Installation Date | Party Responsible | Affiliation | Priority | Maintenance Verifications or Inspections | Findings Summary | Corrective Actions Summary | Waste (lbs) |
|-----------|---|---------------|------------------|-------------------|------------------------------|------------------|----------|--|---------------------------------|----------------------------|-------------|
| 1372-13-1 | Drain Guard, sediment and hydrocarbon filters | 1372 13TH ST | 910.20 Otay | 10/1/08 | Cha-Cha Cervantes | Property Manager | High | 3 | No corrections needed | | 2 |
| 1450-IR-1 | Sump Pump and Screen Mesh | 1450 IRIS AVE | 911.11 Tijuana | 6/27/05 | Alan Jurlina | Property Manager | High | 2 | No corrections needed | | 10 |
| 861-11-1 | KriStar, Flo Gard Plus Catch Basin Insert | 861 11TH ST | 910.20 Otay | 6/1/07 | Kylie Kavanagh | Resident | Low | 2 | No corrections needed | | 1 |
| 861-11-2 | KriStar, Flo Gard Plus Catch Basin Insert | 861 11TH ST | 910.20 Otay | 6/1/07 | Kylie Kavanagh | Resident | Low | 2 | No corrections needed | | 1.5 |
| 861-11-3 | KriStar, Flo Gard Plus Catch Basin Insert | 861 11TH ST | 910.20 Otay | 6/1/07 | Kylie Kavanagh | Resident | Low | 2 | No corrections needed | | 2 |
| 481-PA-1 | Drain Guard in back | 481 PALM AVE | 910.20 Otay | 11/1/08 | SimCal | Property Manager | Low | 0 | No corrections needed | | |
| 481-PA-2 | sediment trap IN BACK | 481 PALM AVE | 910.20 Otay | 11/1/08 | SimCal | Property Manager | Low | 0 | No corrections needed | | |
| 481-PA-3 | hydrocarbon filter in front parking area | 481 PALM AVE | 910.20 Otay | 11/1/08 | SimCal | Property Manager | Low | 0 | No corrections needed | | |
| 836-PA-1 | KriStar, Flo Gard Plus Catch Basin Insert w/ boom | 836 PALM AVE | 910.20 Otay | 5/1/02 | Imperial Beach Promenade LCC | Property Owner | High | 2 | Repair and maintenance required | Repaired and maintained | 14.01 |
| 836-PA-2 | KriStar, Flo Gard Plus Catch Basin Insert w/ boom | 836 PALM AVE | 910.20 Otay | 5/1/02 | Imperial Beach Promenade LCC | Property Owner | High | 2 | Repair and maintenance required | Repaired and maintained | 20.95 |
| 836-PA-3 | KriStar, Flo Gard Plus Catch Basin Insert w/ boom | 836 PALM AVE | 910.20 Otay | 5/1/02 | Imperial Beach Promenade LCC | Property Owner | High | 2 | Repair and maintenance required | Repaired and maintained | 27.74 |

Table 2.3 - Treatment Control BMP Inventory and Maintenance Tracking

| ID | Type | LOCATION | HU and WATERSHED | Installation Date | Party Responsible | Affiliation | Priority | Maintenance Verifications or Inspections | Findings Summary | Corrective Actions Summary | Waste (lbs) |
|---------------|---|---------------|------------------|-------------------|------------------------------|----------------|----------|--|---------------------------------|----------------------------|---------------|
| 836-PA-4 | KriStar, Flo Gard Plus Catch Basin Insert w/ boom | 836 PALM AVE | 910.20 Otay | 5/1/02 | Imperial Beach Promenade LCC | Property Owner | High | 2 | Repair and maintenance required | Repaired and maintained | 8.49 |
| 836-PA-5 | KriStar, Flo Gard Plus Catch Basin Insert w/ boom. | 888 PALM AVE | 910.20 Otay | 5/1/02 | Imperial Beach Promenade LCC | Property Owner | Low | 2 | No corrections needed | | 7.59 |
| 836-PA-6 | KriStar, Flo Gard Plus Catch Basin Insert w/ boom | 888 PALM AVE | 910.20 Otay | 5/1/02 | Imperial Beach Promenade LCC | Property Owner | Low | 2 | No corrections needed | | 12.23 |
| 1101-PA-1 | KriStar, Catch Basin with insert | 1101 PALM AVE | 910.20 Otay | 9/1/08 | NORTH ISLAND C.U. | Primary Tenant | Low | 1 | No corrections needed | | |
| 1101-PA-2 | KriStar, Catch Basin with insert | 1101 PALM AVE | 910.20 Otay | 9/1/08 | NORTH ISLAND C.U. | Primary Tenant | Low | 1 | No corrections needed | | |
| 1101-PA-3 | KriStar FGP-0002 | 1101 PALM AVE | 910.20 Otay | 9/1/08 | NORTH ISLAND C.U. | Primary Tenant | Low | 1 | No corrections needed | | |
| 1101-PA-4 | KriStar FLOGARD Downspout Filter FG-DS4 | 1101 PALM AVE | 910.20 Otay | 9/1/08 | NORTH ISLAND C.U. | Primary Tenant | Low | 0 | No corrections needed | | |
| 1126-13-1 | Drop Inlet Catch Basin Insert w/ boom (Ocean Protection Technology) | 1126 13TH ST | 911.11 Tijuana | 5/1/05 | 13th Street Market | Business Name | Low | 2 | Maintenance required | Maintained | 17 |
| 1126-13-2 | Drop Inlet Catch Basin Insert w/ boom (Ocean Protection Technology) | 1126 13TH ST | 911.11 Tijuana | 5/1/05 | 13th Street Market | Business Name | Low | 2 | Maintenance required | Maintained | 23 |
| 1126-13-3 | Drop Inlet Catch Basin Insert w/ boom (Ocean Protection Technology) | 1126 13TH ST | 911.11 Tijuana | 5/1/05 | 13th Street Market | Business Name | Low | 2 | Maintenance required | Maintained | 28 |
| 1126-13-4 | Drop Inlet Catch Basin Insert w/ boom (Ocean Protection Technology) | 1126 13TH ST | 911.11 Tijuana | 5/1/05 | 13th Street Market | Business Name | Low | 2 | Maintenance required | Maintained | 26 |
| Totals | | | | | | | | 34 | | | 201.51 |

Table 2.4 - Development Review and SUSMP Project Inventory FY 2009-10

| Date | 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/SWPPP | Construction BMPs | |
|------------|----|-------------------|-------|----------------|---------------------------|---------------------------------|--|---|--|--|---|--|-----------------------------|-----------------------------------|---|---|-------------------------------|------------------------------------|-------------------|---|
| No Date | 1 | MF 779 | Yes | Planning | 221-225 Palm Ave | Building add. | 8 unit residential and commercial | X | X | | | | | | | | | | | |
| No Date | 2 | MF 1034 | Yes | Planning | 536 13th 535 Florence St | Bike Village | Bay Shore Bike Path Bike Village and Hostel | | | | | | | | | | | | | |
| 5/29/2010 | 3 | 270, 09-050, 09-0 | Yes | Plan Check | 800 Seacost | Hotel | Seacoast Inn demolition and development | X | X | X | X | X | X | X | X | X | X | X | X | X |
| 11/9/2009 | 4 | CIP MF 950 | Yes | Plan Check | 495 10th St | CIP | Public Works yard expansion | | | | | | | | | | | | | |
| 11/14/2007 | 5 | MF 962 | Yes | Plan Check | 400 7th Street | SFR | New SFR behind existing SFR | X | X | X | | X | | | X | X | X | X | X | X |
| 6/1/2010 | 6 | MF 1003 | Yes | Plan Check | 853 Emory St | Demolition/ new construction | demolition and const of new church | X | | X | X | X | | | X | X | | X | X | X |
| 7/29/2009 | 7 | CIP R05-201 | No | Active | 735 Palm Ave | NICU Demolition | Building demolition | | | | | | | | | | | | | X |
| 7/10/2009 | 8 | CIP F05-204 | No | Active | 865 Imperial Beach Blvd | Fire Department Kitchen | Kitchen remodel for fire department | | | | | | | | | | | | | X |
| 12/17/2009 | 9 | CIP P03-502 | No | Active | Veterans Park | Soccer Field terf | Installed new artificail terf soccer field | | | X | | | | | | | | | | X |
| 4/9/2009 | 10 | CIP | No | Active | 825 Imperial Beach | Xeriscape City Hall | Xeriscape City Hall with drou tolerant plants | | | | | | | | | | | | | X |
| 5/2/2010 | 11 | CIP F05-50A | No | Active | 1075 8th | Xeriscape Marina Vista Center | Xeriscape Marnia Vista Center | | | | | | | | | | | | | X |
| 9/1/2009 | 12 | MF 999 | No | Plan Check | 808 13th St | Remodel of church | Redevelopment of Church | X | X | | | X | | | X | X | X | X | X | X |
| 40109 | 13 | 09-411 | No | Plan Check | 1468-1472 Holly | Building Conversion | Convert 4 existing units, garage conversion, and construction of car port to three remodel units | X | X | | | X | | | X | X | X | X | X | X |
| 12/15/2009 | 14 | 09-411 | No | Plan Check | 1460 Holly | SFR Remodel | Home remodel | X | X | X | | X | | | X | X | X | X | X | X |
| 12/28/2009 | 15 | MF 1030 | No | Plan Check | 1194 Connecticut | New SFR Unit | New SFR | X | X | | | X | | | X | | X | X | X | X |
| 3/2/2010 | 16 | 10-169 | No | Plan Check | 302 Calla | Building Add | Addition of second story | X | X | | | X | | | X | | X | X | X | X |
| 3/9/2010 | 17 | MF 1034 | No | Plan Check | 536 13th and 535 Florence | Building Conversion | Convert warehouse buildings into retail. commercial | X | X | | | X | | | X | | X | X | X | X |
| 4/22/2010 | 18 | MF 1037 MF 788 | No | Plan Check | 253-255 Elm | Condo Conversion | Convert 2 units to condos | X | X | | | X | | | X | | X | X | X | X |
| 40302 | 19 | MF 1040 | No | Plan Check | 1258 IB Blvd | Wireless Communication Facility | New wireless communication facility | | X | | | X | | | X | | X | X | X | X |
| 5/27/2010 | 20 | MF 1045 | No | Plan Check | 1174 Seacoast | Demolition | Demolition 5 unit complex | X | X | | | X | | | X | | X | X | X | X |
| 40330 | 21 | MF 974 | No | Plan Check | 933 Seacoast | Wireless Communication Facility | New wireless communication facility | | | | | X | | | X | | X | X | X | X |
| 40331 | 22 | MF 963 | No | Plan Check | 750 13th | Wireless Communication Facility | New wireless communication facility | | | | | X | | | X | | X | X | X | X |
| No Date | 23 | 09-543 | No | Plan Check | 311 Evergreen | SFR Remodel | Building addition | X | X | | | X | | | X | | X | X | X | X |
| No Date | 24 | 10-149 | No | Plan Check | 523 Spruce | Building Add | Building addition | X | X | | | X | | | X | | X | X | X | 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, the Capital Improvements Projects Division, the Environmental Division, and requirements that apply to the Building and Planning Division activities related to construction and construction permits, and compliance actions proposed by the City. This section of the Annual Report discusses program management, implementation, and changes made during FY 2009-10 to the JURMP Construction Component.

3.2 Outcome Level 1a: Administration of Management Program Activities

The City's implementation and assessment strategy for the Construction component is described in the *2008 JURMP Section 5.0*. This section has been updated to include the implementation of the Countywide Model SUSMP into the operations of the City. Municipal Code Chapter 8.32 was amended on February 3, 2010 to include the new requirements of the Model SUSMP. The City is currently in the process of updating construction application forms and education materials. The City also maintains an ongoing database of active construction projects and tracks inspections through the City's database software HTE.

3.3 Outcome Level 1b: Implementation of Management Program Activities

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. All construction projects are formally inspected throughout the duration of the project. During the rainy season all priority projects were inspected at least biweekly, medium priority sites were inspected at least monthly, and low priority projects were inspected as needed. During the dry season, all construction sites were inspected as needed.

The following tables and figures presented in this section provide additional information on the implementation and assessment of the Construction program element:

- Table 3.1 provides an overview of the Construction element as it was implemented during FY 2009-10.
- Table 3.2 presents and describes targeted FY 2009-10 outcomes and results
- Table 3.3 FY 2009-10 active construction inventory and inspection frequency

3.4 Outcome Level 2: Knowledge and Awareness of Program Implementation by Staff and Contractors

Education is provided to contractors 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, BMP implementation, and water quality. The education effort for City staff is discussed in the *2008 JURMP Section 10.0*.

3.5 Outcome Level 3: Behaviors and Best Management Practice (BMP) Implementation by Staff and Contractors

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 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.

3.6 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 the reporting period 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 67 active construction projects and 5 Capital Improvement Projects to reduce pollutants and runoff to the MEP. Compliance with required minimum BMPs were then verified through 495 site inspections. Source load reductions may not be directly measured but can be implied by the proper implementation and maintenance of storm water BMPs.

Table 3.1 – Overview of Construction Inventory by Priority Classification

| Category | Number | Description |
|---------------------------------------|---|---|
| A. Type of Construction | | |
| Discretionary Projects | 67 | |
| Capital Improvement Projects (CIP) | 5 | |
| Priority Development (SUSMP) Projects | 0 | |
| B. Priority Classification | | |
| High Priority Projects (SUSMP) | 0 | High priority projects are determined by City 7-A form and generally consist of new building construction projects plus SUSMP projects. Most development projects in the City are categorized as low priority. |
| Medium Priority Projects | 2 | |
| Low Priority Projects | 70 | |
| C. Totals | | |
| Construction Projects | 72 | *The City no active SUSMP or Priority projects during the reporting period. All active construction projects were discretionary in nature or capital improvements. |
| Priority Development (SUSMP) Projects | 0* | |
| JURMP Sections | Description of FY 2009-10 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. | |

Table 3.2 - Construction Component Targeted Outcomes and Results

| Construction FY 2009-10 Results | | | |
|---|---|-------------------|---|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| LEVEL 1a OUTCOMES (ADMINISTRATION MANAGEMENT PROGRAM ACTIVITIES) | | | |
| a) Modifications to JURMP | | | |
| Update applicable JURMP sections per new Permit requirements | No updates made during FY 2009-10 | Complete | Applicable updates were included in <i>JURMP Section 5.0</i> . |
| b) Updates to Program Documentation (Policies, Plans, Procedures, and Forms) | | | |
| Update program documentation for consistency with program updates | Updates made to City SUSMP | Complete | Updates made to Imperial Beach Municipal Code 8.32 to include the requirements of the SUSMP. The City is also looking into updating its Environmental Review forms (7-A and 7-B) and updating guidance documents to include further guidance for SUSMP, HMP, and General Construction Permits. |
| c) Year-End Program Review | | | |
| Complete annual year-end program review | Review program for effectiveness and efficiency | Complete | 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. |
| d) Inventory of Construction Projects and Inspections | | | |
| Update inventory for construction projects and track inspections | Updates made to the inventory throughout the reporting period and inspections tracked | 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. |

Table 3.2 - Construction Component Targeted Outcomes and Results

| Construction FY 2009-10 Results | | | |
|---|--|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| LEVEL 1b OUTCOMES (IMPLIMENTATION OF MANAGEMENT PROGRAM ACTIVITIES) | | | |
| a) Jurisdictional Requirements for Project Approval | | | |
| Require construction 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. Designated minimum BMPs for construction projects are listed in the <i>2008 JURMP Section 5.0</i> . Construction BMPs are verified through the Project Review process and during site inspections. |
| b) Confirmation of 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 require additional 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 information on construction activities is provided in the <i>2008 JURMP Section 5.0</i> . Information is tracked in the City's HTE database and in excel spread sheets. |
| c) Confirmation of Designated BMPs | | | |
| Verify that designated BMPs were implemented, or required to be implemented | Construction projects undergo project review before being issued City permits. Construction projects are inspected for BMP compliance. | Complete | Designated minimum BMPs are required as project conditions during the urban runoff approval process. Projects then receive inspections during the construction phase to verify the proper implementation of BMPs. Projects are inspected for adequate storm water construction BMPs and project design, and source control BMPs. |

Table 3.2 - Construction Component Targeted Outcomes and Results

| Construction FY 2009-10 Results | | | |
|--|---|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| d) Confirmation of Maximum Disturbed Area | | | |
| Verify that maximum disturbed area for grading was applied to applicable construction sites | Apply conditions for maximum disturbed area during project review and verify through inspections | Complete | Project applicants are made aware of storm water requirements during the grading and construction permit application process. The grading permit specifies conditions to control the erosion of sediment off the property. |
| e) Municipal Staff Training | | | |
| Ensure that municipal staff are knowledgeable on storm water BMPs related to construction activities, SUSMP, and HMP | Staff educated through meetings, workshops, and training s | Complete | Community Development and Public Works Departments meet weekly to review critical issues including storm water project development requirements. Monthly meetings are also held to discuss code enforcement related issues. Planning Division, Building Division, Code Compliance Division, Redevelopment Division, and Environmental Division all received training outside the City on multiple storm water issues. Training topics include SUSMP, HMP, TMDLs, General Construction Permit, and code enforcement. Daily interaction with City staff ensures that storm water pollution prevention remains a high priority throughout the City. |
| f) Construction Contractor Education | | | |
| Provide education for contractors | Counter hours held, meetings conducted throughout reporting period and provided construction brochure | 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. A new construction brochure was also created to provide additional information on proper BMP implementation. |

Table 3.2 - Construction Component Targeted Outcomes and Results

| Construction FY 2009-10 Results | | | |
|---|---|--|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| g) Confirmation of Construction Inspections | | | |
| Inspect construction activities | The Building Inspector, Public Works Inspector, and Environmental Division conducted inspections for BMP compliance at construction sites | 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. The Community Development Department Building Inspector inspects discretionary projects that are not CIPs. The Environmental Division follows up on complaints and violations at construction sites. |
| h) Special Investigations | | | |
| Not Targeted | None | None | Special investigations were not conducted in FY 2009-10, and are not routinely conducted as part of the implementation strategy for this program element. |
| LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY STAFF AND DEVELOPERS) | | | |
| Establish a baseline of staff knowledge regarding applicable program content | Performed a survey on 9/30/10 of Public Works Department as part of annual training. | Survey consisted of 18 challenging questions. Public Works Department (20 surveys completed) average score of 84%. | The City incorporates surveys or pre and post tests into training programs and administers them when appropriate. The surveys administered during training sessions provide a baseline of knowledge of core concepts and helps in refining the municipal training program for the next reporting period. The overall results show a high level of knowledge on core storm water management concepts in the City. Surveys were only administered to Public Works employees in FY 2009-10. Surveys conducted for Community Development during the past two reporting periods scored very high on knowledge of storm water concepts. |

Table 3.2 - Construction Component Targeted Outcomes and Results

| Construction FY 2009-10 Results | | | |
|---|--|---|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| Establish a baseline of contractor knowledge regarding applicable program content | Community Development and Public Works Departments provide education opportunities for contractors | Knowledge and awareness through proper BMP implementation | The Community Development Department held counter hours and face-to-face meetings throughout FY 2009-10 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 2009-10, and are not routinely conducted as part of the implementation strategy for this program element. |
| LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY STAFF AND CONTRACTORS) | | | |
| a) Procedural and Administrative Behaviors | | | |
| Review projects and prescribe necessary conditions of approval | All constructions projects (72 projects) were reviewed for conditions of approval and designated high, medium, or low priority ranking | Complete | The City reviews and conditions all proposed projects to ensure all necessary conditions and BMPs are met before any construction permits are issued. After a City permit is issued the project is in active construction phase and receives the necessary frequency of inspections for BMP compliance. Inspection frequency is based on high, medium, or low priority ranking. Storm water compliance is a component of every site inspection for a given project. |
| b) BMP Implementation | | | |
| Inspect projects and verify BMPs | Building Division conducted 306 BMP site inspections and PW performed 198 BMP inspections. | Complete | The City inspects and verifies BMPs at all projects to ensure compliance with storm water program. The Building Inspector, Public Works Inspector, Code Enforcement Officer, and Environmental Division share the responsibility of inspecting development projects and verifying BMP compliance. The Building Division conducted 306 BMP site inspections and the Public Works Inspector provided daily oversight at all CIP construction sites and performed 198 BMP inspections. |

Table 3.2 - Construction Component Targeted Outcomes and Results

| Construction FY 2009-10 Results | | | |
|--|---|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| Verify construction sites with advance treatment | No construction sites required advance treatment | Complete | No construction sites during the reporting period required the implementation of advanced treatment for sediment control. The City requires all construction sites to implement BMPs to contain sediment on the property during all stages of development. Advance treatment is required for high threat to water quality projects. |
| c) Inspections for Wet and Dry Weather | | | |
| Identify active construction and inspection frequencies for wet and dry season | The City conducted 495 BMP site inspections and exceeded the required minimum inspection frequency | Complete | 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. Most development projects are redevelopment and are less than one acre in size. The City generally inspects construction sites more frequently than the minimum requirement. |
| d) Inspection Results | | | |
| Provide general inspection results | Conducted the necessary minimum BMP inspections at construction sites | Complete | Most contractors are aware of the storm water BMP requirements and properly implement BMPs. Problems arise during the wet season when heavy rain or wind results in the blowout of poorly implemented BMPs. The highest numbers of storm water violations are reported by observant City staffs who observe inadequate BMPs or illegal discharges. |
| e) Violations and Enforcement Actions | | | |
| Number of violations and enforcement actions to achieve compliance. | The City responded to 15 construction related storm water violations. Only 4 violations were from discretionary projects. | Complete | Most construction related violations observed during the reporting period were from small home improvement projects that did not require a project review. Most violations were reported to City staff and followed up on by the Environmental Division. Typical violations include improper washing of equipment, power washing, stock piles of sediment, and trash. Each enforcement case is different but generally involves a verbal or written warning, a notice of violation for a repeat offender or blatant illegal discharger, and a follow up investigation. |

Table 3.2 - Construction Component Targeted Outcomes and Results

| Construction FY 2009-10 Results | | | |
|--|--|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM NEW DEVELOPMENT AND REDEVELOPMENT PROJECTS) | | | |
| a) Erosion and Sediment Control | | | |
| Require erosion and sediment control when soil is disturbed | 72 projects required installation of erosion and sediment control BMPs | Complete | The City requires installation of erosion and sediment control BMPs for all construction sites with a grading or building permit. Load reductions from construction sites can be implied through the proper implementation of BMPs. |
| b) Designated Minimum BMPs | | | |
| Require minimum BMPs and treatment control BMPs | 72 projects required to implement BMPs. No projects required post construction treatment control BMPs | Complete | The City requires all 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 construction sites can be implied through the proper implementation of BMPs. Public Works requires source control and LID BMPs for all projects over \$50,000 as conditions for approval. Treatment control BMPs are required for priority development projects or in cases when it is infeasible for runoff to be diverted to a permeable area. Through the implementation of construction BMPs, source control BMPs, and LIDs source load reductions can be implied. |
| c) Addition Controls for CWA 303(d) Waters | | | |
| Additional BMPs for projects discharging directly to 303(d) waters | No projects required to implement additional controls for CWA Section 303(d) waters | Complete | The City requires additional controls to be implemented for Clean Water Act (CWA) Section 303(d) waters. Load reductions are not tracked but can be implied. |

Table 3.3 - FY 2009-10 Active Construction Inventory and Inspection Frequency

| APPLICATION | PROPERTY ADDRESS | Priority | Weeks Active During Rainy Season (Oct.-Apr.) | Rainy Season Inspections | Dry Season Inspections | Total Inspections | General Results | Enforcement Action Type | Resolved |
|--|-------------------------|----------|--|--------------------------|------------------------|-------------------|-----------------------------------|----------------------------|----------|
| 06 00000245 | 605 FLORENCE ST | Low | 0 | 0 | 1 | 1 | Approved | | |
| 06 00000246 | 1022 ELM AVE | Low | 30 | 0 | 1 | 1 | Approved | | |
| 06 00000346 | 811 CORVINA ST | Low | 30 | 1 | 3 | 4 | Approved | | |
| 06 00000371 | 861 10TH ST | Low | 0 | 1 | 0 | 1 | Approved | | |
| 06 00000447 | 177 CARNATION AVE | Low | 0 | 0 | 1 | 1 | Approved | | |
| 07 00000101 | 349 ELKWOOD AVE | Low | 0 | 0 | 1 | 1 | Approved | | |
| 07 00000277 | 545 11TH ST | Low | 22 | 6 | 6 | 12 | Approved | | |
| 07 00000394 | 754 HICKORY CT | Low | 30 | 5 | 2 | 7 | Insufficient BMPs | Stop Work | Yes |
| 08 00000003 | 1174 EMORY ST | Low | 2 | 1 | 3 | 4 | Approved | | |
| 08 00000038 | 602 7TH ST | Low | 24 | 2 | 1 | 3 | Approved | | |
| 08 00000063 | 1470 5TH ST | Low | 0 | 0 | 1 | 1 | Approved | | |
| 08 00000156 | 815 ENCINA AVE | Low | 30 | 2 | 3 | 5 | Approved | | |
| 08 00000186 | 1461 5TH ST | Low | 9 | 1 | 0 | 1 | Approved | | |
| 08 00000225 | 1185 PALM AVE | Low | 0 | 0 | 2 | 2 | Approved | | |
| 08 00000428 | 1085 CHERRY AVE | Low | 15 | 11 | 9 | 20 | Approved | | |
| 08 00000443 | 1233 CALIFORNIA ST | Low | 30 | 4 | 1 | 5 | Approved | | |
| 09 00000017 | 646 ALABAMA ST | Low | 30 | 1 | 0 | 1 | Approved | | |
| 09 00000068 | 347 EVERGREEN AVE | Low | 21 | 2 | 8 | 10 | Approved | | |
| 09 00000123 | 1331 HOLLY AVE | Low | 0 | 0 | 1 | 1 | Approved | | |
| 09 00000160 | 776 10TH ST | Low | 0 | 0 | 1 | 1 | Approved | | |
| 09 00000221 | 784 8TH ST | Low | 0 | 0 | 2 | 2 | Approved | | |
| 09 00000233 | 280 PALM AVE | Low | 24 | 7 | 13 | 20 | Approved | | |
| 09 00000264 | 1311 CONNECTICUT ST | Low | 1 | 1 | 4 | 5 | Approved | | |
| 09 00000268 | 1100 PALM AVE | Low | 1 | 2 | 3 | 5 | Approved | | |
| 09 00000290 | 894 PALM AVE A | Low | 0 | 0 | 1 | 1 | Approved | | |
| 09 00000316 | 1245 EAST LN | Low | 20 | 5 | 4 | 9 | Approved | | |
| 09 00000330 | 834 FLORIDA ST | Low | 30 | 8 | 2 | 10 | Approved | | |
| 09 00000346 | 813 EMORY ST | Low | 30 | 0 | 1 | 1 | Approved | | |
| 09 00000349 | 735 PALM AVE | Low | 3 | 1 | 0 | 1 | Approved | | |
| 09 00000409 | 309 DAHLIA AVE | Low | 9 | 2 | 3 | 5 | Approved | | |
| 09 00000411 | 1468 HOLLY AVE | Low | 12 | 5 | 6 | 11 | Approved | | |
| 09 00000428 | 309 DAHLIA AVE | Low | 9 | 4 | 1 | 5 | Approved | | |
| 09 00000432 | 172 CITRUS AVE | Low | 13 | 9 | 0 | 9 | Approved | | |
| 09 00000439 | 834 HOLLY AVE | Low | 27 | 8 | 0 | 8 | Approved | | |
| 09 00000443 | 1274 11TH ST | Low | 25 | 7 | 0 | 7 | Approved | | |
| 09 00000445 | 659 SILVER STRAND BLVD | Low | 0 | 1 | 0 | 1 | Approved | | |
| 09 00000451 | 565 BONITO AVE | Low | 16 | 13 | 0 | 13 | No BMPs in Place | NOV | Yes |
| 09 00000476 | 399 8TH ST | Low | 0 | 1 | 0 | 1 | Approved | | |
| 09 00000489 | 1178 14TH ST | Low | 12 | 7 | 0 | 7 | Approved | | |
| 09 00000508 | 739 FLORIDA ST | Low | 9 | 7 | 0 | 8 | No BMPs; ICID | NOV | Yes |
| 09 00000510 | 747 FLORIDA ST | Low | 21 | 7 | 0 | 1 | Approved | | |
| 09 00000511 | 975 HEMLOCK AVE | Low | 5 | 7 | 2 | 6 | Approved | | |
| 09 00000535 | 1295 13TH ST | Low | 5 | 7 | 1 | 4 | Approved | | |
| 09 00000536 | 741 3RD ST | Low | 12 | 7 | 0 | 8 | Approved | | |
| 09 00000537 | 632 DAHLIA AVE | Low | 6 | 7 | 0 | 7 | Approved | | |
| 09 00000543 | 311 EVERGREEN AVE | Low | 8 | 7 | 4 | 8 | Approved | | |
| 09 00000544 | 941 ARRIBA AVENIDA | Low | 13 | 7 | 1 | 4 | Approved | | |
| 09 00000545 | 776 FLORENCE ST | Low | 11 | 7 | 7 | 9 | Approved | | |
| 10 00000011 | 1450 IRIS AVE | Low | 2 | 7 | 2 | 6 | Insufficient BMPs; Permits needed | Stop Work | Yes |
| 10 00000027 | 1194 CONNECTICUT ST | Low | 0 | 7 | 4 | 4 | Approved | | |
| 10 00000076 | 941 ARRIBA AVENIDA | Low | 3 | 7 | 0 | 1 | Approved | | |
| 10 00000078 | 1410 10TH ST | Low | 9 | 7 | 0 | 1 | Approved | | |
| 10 00000082 | 527 BONITO AVE | Low | 0 | 7 | 4 | 4 | Approved | | |
| 10 00000099 | 425 IMPERIAL BEACH BLVD | Low | 8 | 7 | 0 | 1 | Approved | | |
| 10 00000106 | 538 CITRUS AVE | Low | 1 | 7 | 0 | 1 | Approved | | |
| 10 00000147 | 795 DELAWARE ST | Low | 5 | 7 | 0 | 1 | Approved | | |
| 10 00000158 | 1025 3RD ST | Low | 0 | 7 | 4 | 4 | Approved | | |
| 10 00000162 | 343 ELDER AVE | Low | 0 | 7 | 6 | 6 | Approved | | |
| 10 00000169 | 302 CALLA AVE | Low | 0 | 7 | 1 | 1 | Approved | | |
| 10 00000180 | 1440 CALIFORNIA ST | Low | 0 | 7 | 5 | 5 | Approved | | |
| 10 00000198 | 417 CALLA AVE | Low | 0 | 7 | 2 | 2 | Approved | | |
| 10 00000239 | 816 IRIS AVE | Low | 0 | 7 | 1 | 1 | Approved | | |
| 10 00000253 | 526 9TH ST | Low | 0 | 7 | 2 | 2 | Approved | | |
| 10 00000256 | 828 FLORENCE ST | Low | 0 | 7 | 1 | 1 | Approved | | |
| 10 00000264 | 311 EVERGREEN AVE | Low | 0 | 7 | 2 | 2 | Approved | | |
| 10 00000275 | 569 10TH ST | Low | 0 | 7 | 3 | 3 | Approved | | |
| 10 00000304 | 1124 CONNECTICUT ST | Low | 0 | 7 | 2 | 2 | Approved | | |
| Public Works Capital Improvement Projects | | | | | | | | Project Discription | |
| CIP R05-201 | 735 Palm Ave | Med | 4 | 8 | 12 | 48 | | NICU Demolition | |
| CIP F05-204 | 865 Imperial Beach Blvd | Low | 10 | 10 | 20 | 20 | | Fire Department Kitchen | |
| CIP P03-502 | Veterans Park | Med | 12 | 12 | 24 | 96 | | Soccer Field turf | |
| CIP | 825 Imperial Beach | Low | 0 | 20 | 20 | 20 | | Xeriscape City Hall | |
| CIP F05-50A | 1075 8th | Low | 0 | 5 | 5 | 5 | | Xeriscape Marina Vista Cen | |

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 management, implementation, and changes made during FY 2009-10 to the JURMP Municipal Component.

4.2 Outcome Level 1a: Administration of Management Program Activities

The City's implementation and assessment strategy for the municipal component is described in the 2008 JURMP Section 6.0. During FY 2009-10 the City continued implementation of its municipal training program that included significant updates and revisions to the BMP guidance documents for Municipal Facilities and Activities. This guidance document for employees can be found in a binder within every City vehicle. Updates were also made to the municipal facilities and activities inventory to match the regional reporting standard in development by the Copermittee Municipal Workgroup. Lastly, updates were made to Municipal Inspection Forms and MS4 maintenance forms to improve efficiency and effectiveness analysis in reporting.

4.3 Outcome Level 1b: Implementation of Management Program Activities

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 provides the eyes and ears on the street and serve as 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, cleaning, and implementation of BMPs for municipal facilities and activities keep accumulated debris and other potential pollutants from entering the MS4. At a minimum the City conducts annual formal inspections of high priority municipal facilities and activates. 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.

During FY 2009-10 the City conducted two projects categorized as Special Studies. The first was completion of the post construction monitoring and assessment of the Palm Ave 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 second special study was an update to the Storm Drain Master Plan that will be complete in August 2010. Updates to the Master Plan include a review of previous storm drain studies (i.e. 1960 and 1991), GIS

and mapping updates, hydrologic and hydraulic modeling of the MS4, identification of system deficiencies, and recommendations.

The following tables and figures presented in this section provide additional information on the implementation and assessment of the Municipal program element:

- Table 4.1 Provides an overview of the Municipal inventory by facility type and priority classification
- Table 4.2 presents and describes targeted FY 2009-10 outcomes and results
- Figure 4.1 Street sweeping removal totals
- Figure 4.2 MS4 cleaning totals
- Table 4.3 Municipal storm drain filter inventory and maintenance records
- Table 4.4 Municipal facility and activity inventory and inspection records

4.4 Outcome Level 2: Knowledge and Awareness of Program Implementation by Staff

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. Pre training surveys are also conducted to assess the level of knowledge and effectiveness of the annual training events. This education effort for City staff is discussed in the *JURMP Section 10.0*.

4.5 Outcome Level 3: Behaviors and Best Management Practice (BMP) Implementation by Staff

The *JURMP Appendix E* defines minimum BMP requirements applicable to streets, roads, highways, municipal areas, municipal activities, and parking facilities in the City. Major targeted outcomes for FY 2009-10 included streets and parking lot sweeping, MS4 cleaning, sewer system preventative maintenance, municipal storm drain BMP maintenance, integrated pest management at parks, and implementation of BMPs at municipal facilities. All BMPs are inspected and enforced for compliance.

4.6 Outcome Level 4: Source Load Reductions

The City continues to make 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 177 tons of trash and debris were collected through street sweeping operations. The City also collected 132 loads of large bulky items illegally dumped in City alleys through its franchise waste hauler EDCO.

The Sewer Division maintains the City's storm drain lines and catch basins. Approximately five miles of underground piping, 117 catch basins and inlets, and seven open drainage facilities were cleaned

through the year. A total of 8,230 pounds of trash, sediment, and organic matter was collected out of the MS4 system during the reporting period. Storm drain cleaning occurs between the months of May through September.

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 2009-10. 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 contrast with Donovan Prison for a weekly crew to pick up trash and conducts landscape duties at City parks and unmaintained areas. The City tracks source loads whenever possible.

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> | | | |

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

| Category | Miles | Number | Description of Changes |
|------------------------------|-------|---|------------------------|
| Underground piping | 5 | --- | |
| 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 2009-10 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. | |

Table 4.2 - Municipal Component Targeted Outcomes and Results

| Municipal FY 2009-10 Results | | | |
|---|--|-------------------|---|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| LEVEL 1a OUTCOMES (ADMINISTRATION MANAGEMENT PROGRAM ACTIVITIES) | | | |
| a) Modifications to JURMP | | | |
| Update applicable JURMP sections per Permit requirements | No updates were made | Complete | Applicable updates were included in <i>JURMP Section 6.0</i> . No significant updates are expected to be necessary during this permit cycle. |
| b) Updates to Program Documentation (Policies, Plans, Procedures, and Forms) | | | |
| Update program documentation for consistency with program updates | Updates made to Municipal Inspection Forms, MS4 maintenance forms, and Municipal BMP guidance document | Complete | The City made updates to its Municipal Inspection Forms and MS4 maintenance forms to improve efficiency in reporting. Updates were also made to the BMP guidance document for Municipal Facilities and Activities. Every City vehicle contains a binder with a storm drain map and information on proper BMPs for municipal facilities and activities. |
| c) Year-End Program Review | | | |
| Complete annual year-end program review | Review program for effectiveness and efficiency | Complete | 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. |
| d) Updates to Training Program | | | |
| Update training materials for municipal staff | Made updates to the Municipal Facility and Activity BMP program document | Complete | The City makes annual updates to the municipal training content and materials so that each education activity provides appropriate information for the target audience. This year updates were made to the BMP guidance document for municipal facilities and activities. Every City vehicle contains a binder with a storm drain map and information on proper BMPs for municipal facilities and activities. |

Table 4.2 - Municipal Component Targeted Outcomes and Results

| Municipal FY 2009-10 Results | | | |
|---|--|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| e) Updates to Municipal Inventor or Prioritization | | | |
| Update municipal inventory | The municipal inventory was updated to match the Copermittee regional reporting standard | Complete | The City made updates to the municipal facilities and activities inventory to match the regional reporting standard developed by the Copermittee Municipal Workgroup. The new standardized reporting template will allow for greater collaboration between jurisdictions and may eventually lead to a regional reporting format. |
| LEVEL 1b OUTCOMES (IMPLIMENTATION OF MANAGEMENT PROGRAM ACTIVITIES) | | | |
| a) Jurisdictional Requirements for Municipal Facilities and Activities | | | |
| Require municipal areas and activities to implement minimum BMPs | Implemented BMPs and verified through inspections and reinforced through annual training | 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 Municipal Facilities and Activities that were updated in 2009. The binder is a reference tool for employees to properly implement BMPs for specific job tasks and a reference for responding to illegal discharges. |
| b) Confirmation of Designated Minimum BMPs | | | |
| Verify the implementation of minimum BMPs for municipal areas and activities | BMPs are implemented and verified through inspections and reinforced through annual training | 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 Municipal Facilities and Activities that were updated in 2009. The binder is a reference tool for employees to properly implement BMPs for specific job tasks and a reference for responding to illegal discharges. |

Table 4.2 - Municipal Component Targeted Outcomes and Results

| Municipal FY 2009-10 Results | | | |
|---|--|-------------------|---|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| c) Confirmation of Municipal Inspections | | | |
| Verify that municipal inspections achieve BMP compliance | BMPs are verified through inspections and reinforced through annual training | Complete | Municipal inspections are used as means to verify the implementation of BMPs at municipal facilities and activities. Inspections also serve to educate staff, reinforce storm water concepts, and improve communication across City Divisions. |
| d) Municipal Staff Training | | | |
| Provide training opportunities for municipal staff | Staff educated through meetings, workshops, and trainings | Complete | Community Development and Public Works Departments meet weekly to review critical issues including storm water project development requirements. Monthly meetings are also held to discuss code enforcement related issues. Annual training is provided to Public Works staff and was conducted on 9/30/09. Municipal inspections serve as one-on-one training for Division supervisors. Regional workshops on SUSMP, HMP, GCP, TMDLs, and code enforcement made available to staff. Daily interaction with City staff ensures that storm water pollution prevention remains a high priority throughout the City. |
| e) Confirmation of Pesticide, Herbicide, and Fertilizer Management | | | |
| Verify designated BMPs for pesticides, herbicides, and fertilizer | IPM and BMPs implemented | Complete | The City limits the application of pesticides and herbicides applied to park and landscaping facilities in accordance with Integrated Pest Management Program policy. |

Table 4.2 - Municipal Component Targeted Outcomes and Results

| Municipal FY 2009-10 Results | | | |
|--|---|--|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| f) Confirmation of Maintain for Municipal BMPs | | | |
| Verify maintenance of municipal storm water BMPs | Maintained operation and maintenance of existing storm water BMPs | Complete | The City maintains a number of storm water BMPs along the storm water conveyance system including two urban low flow and first flush storm drain diverters, 13 storm drain filters, 1 CDS unit, vegetated ditches, and infiltration areas with french drains. |
| g) Special Investigations | | | |
| No targeted | 2010 update to the Storm Drain Master Plan | Partially Complete | The update of the Storm Drain Master Plan will be complete in August 2010. Updates include review of previous storm drain studies (i.e. 1960 and 1991), GIS and mapping, hydrologic and hydraulic modeling, identification of system deficiencies, and recommendations. |
| Not targeted | Palm Ave Diverter CBI Grant Final Report | Complete | The Final Monitoring Report for the Palm Ave Diverter Project was submitted to the State Water Board on January 20, 2010 in compliance with the Clean Beaches Initiative Prop 50 grant agreement. |
| LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY STAFF) | | | |
| Establish a baseline of staff knowledge regarding applicable program content | Performed a pre training survey on 9/30/10 of Public Works Department | Survey consisted of 18 challenging questions. Public Works Department (20 surveys completed) average score of 84%. | The City incorporates surveys or pre and post tests into training programs and administers them when appropriate. The surveys administered during training sessions provide a baseline of knowledge of core concepts and helps in refining the municipal training program for the next reporting period. The overall results show a high level of knowledge on core storm water management concepts in the City. Surveys were only administered to Public Works employees in FY 2009-10 and scores indicated an increase in knowledge from the previous reporting period (81% to 84%). Surveys conducted for Community Development during the past two reporting periods scored very high on knowledge of storm water concepts. |

Table 4.2 - Municipal Component Targeted Outcomes and Results

| Municipal FY 2009-10 Results | | | |
|--|--|-------------------|---|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY STAFF) | | | |
| a) BMP Implementation for Streets, Roads, Highway, and Parking Facilities | | | |
| 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 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 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 improved streets, roads, and highways | 127.9 curb-miles swept (2,392 total miles) swept) | Complete | 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 Donovan Correctional Facility to provide supervised labor for various needs including landscaping and trash pickup. The Streets and Parks Divisions play a crucial role in keeping the City free of trash. EDCO also conducts alley sweeps for large bulky items upon request from the City. Finally, the City provides a Home Front Cleanup event for residents to dispose of accumulated waste. |
| Collect trash and debris from non-sweeping activities | Collected trash and debris from parks, alleys, and tideland area | Complete | |

Table 4.2 - Municipal Component Targeted Outcomes and Results

| Municipal FY 2009-10 Results | | | |
|--|--|--------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| b) BMP Implementation for Municipal Separate Storm Sewer System (MS4) | | | |
| Clean accumulations of trash and debris greater than 33% of design capacity | 117 catch basins inspected (100%) | Complete | Storm drain cleaning generally occurs between the months of May and September. In this annual report we provide analysis for the specified reporting period (July 1 st – June 30 th), which includes records of both the 2009 and 2010 cleaning events. It is important to note that the City inspects all of its 117 catch basins and cleans them if necessary on an annual basis. |
| Inspect and clean MS4 line | 100% of the MS4 inspected and 29,435 feet of storm drain cleaned | Complete | The City cleans and inspects 100% of the catch basins and endeavors to clean 100% of the 5 miles of storm drain lines annually. The Sever Division uses the vactor truck to jet and clean accumulated debris out of the MS4. Cleaning for the 2010 season will be finished in September. |
| Prioritization of MS4 system maintenance | Review underway | Partially Complete | 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 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. |
| Prevent and eliminate infiltration from the sanitary sewer to the MS4 | Implementation of the 2008 Sewer System Maintenance Plan | 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. The City is in the 3 rd year of a 5-year CIP to CCTV the entire sewer system. |
| 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. |

Table 4.2 - Municipal Component Targeted Outcomes and Results

| Municipal FY 2009-10 Results | | | |
|--|---|-------------------|---|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| Respond to all sewer spills received and log in appropriate data bases | 6 sewer spills reported with 3 from private laterals | Completed | In the event of a sewer spill, City staff follows procedures laid out in its Sanitary Sewer Overflow Response Plan. The City experienced 6 sewer spills during FY 2009-10 and 3 of those were from private laterals. |
| c) BMP Implementation for Municipal Facilities and Activities | | | |
| Implement BMPs and maintain municipal treatment control BMPs | Maintained 13 storm drain or catch basin filters, 2 storm drain diverters, 1 CDS unit, vegetated swales, and infiltration areas | Complete | The City enforces compliance of minimum BMPs at all municipal facilities and maintenance activities. In addition, the City maintains 13 storm drain filters that are maintained quarterly by contract. The City also operates 2 storm drain diverters, one CDS unit, and a number of vegetated swales and infiltration areas. |
| d) Municipal Facilities and Activities Inspection Results | | | |
| Provide general inspection results for municipal areas and activities | Inspected 100% of municipal facilities and provided training on BMPs for municipal activities | Complete | General inspection results include the following: quarterly maintenance of municipal storm drain filters, proper implementation of minimum BMPs by staff, internal review and training on BMPs for municipal areas and activities. |
| e) Violations and Enforcement Actions | | | |
| Number of violations and enforcement actions to achieve compliance. | No enforcement actions necessary to achieve compliance | Complete | Minor violations were noted during municipal inspections and corrected without enforcement actions. Such violations include replacement of old BMPs (i.e. straw waddles, spill response kits, drip pans). A sediment trap was also installed at the Public Works yard to prevent the traction of sediment into the street. |

Table 4.2 - Municipal Component Targeted Outcomes and Results

| Municipal FY 2009-10 Results | | | |
|---|---|-------------------|---|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM MUNICIPAL FACILITIES AND ACTIVITIES) | | | |
| a) Street Sweeping | | | |
| Track debris collected from street sweeping activities | Trash: 17.7 tons Debris: 141.6 tons Organics: 17.7 tons | Complete | The City collected a total of 177 tons of material from street sweeping activities. The City sweeps 19.2 miles of commercial area and 4 municipal parking lots weekly (high priority), 9.6 miles of beach front biweekly (medium priority), and 99.1 miles of residential area monthly (low priority). |
| b) Cleanup Activities | | | |
| Track EDCO alley sweeps and Home Front Clean Up totals | EDCO Alley Sweeps: 132 callouts Home Front Clean Up: 175.64 tons | Complete | EDCO conducts alley sweeps for large bulky items upon request from the City. In addition, the City provides a Home Front Cleanup event for residents to dispose of accumulated waste. The City also conducts a number of other cleanup activities to collect trash and debris from municipal areas; however, this waste is not tracked at this time. |
| c) MS4 Cleaning | | | |
| Track debris collected through MS4 cleaning | Trash: 1,056 lbs Debris: 2,012 lbs Organics: 5,161 lbs | Complete | There are approximately 117 catch basins and approximately 5 miles of storm drain pipe that is maintained and cleaned annually. The Sewer Division has successfully cleaned 100% of the MS4 system annually over the past 3 years and is on track to achieve the same results for 2010. MS4 cleaning starts in May and continues through September. During FY 2009-10 the Sewer Division cleaned a total of 8,230 lbs of material out of the MS4. |
| d) Municipal Storm Drain Filters | | | |
| Track debris collected from 13 municipal storm drain filters | Trash: 345.9 lbs Debris: 114.9 lbs Organic: 390.7 lbs | Complete | Downstream Services maintains 13 municipal storm drain filters quarterly. During the reporting period 851.5 pounds of debris was captured through municipal storm drain filters. |

Table 4.2 - Municipal Component Targeted Outcomes and Results

| Municipal FY 2009-10 Results | | | |
|--|---|-------------------|---|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| e) Storm Water Diverters | | | |
| Monitor storm water diversion from Palm Ave Diverter | Palm Ave Diverter: 156,000 gallons diverted into the sanitary sewer | Complete | The City operates two storm drain diverters (Palm Ave and Date Ave). Only the diverted flow from Palm Ave is monitored and tracked. |

Figure 4.2-Street Sweeping Totals

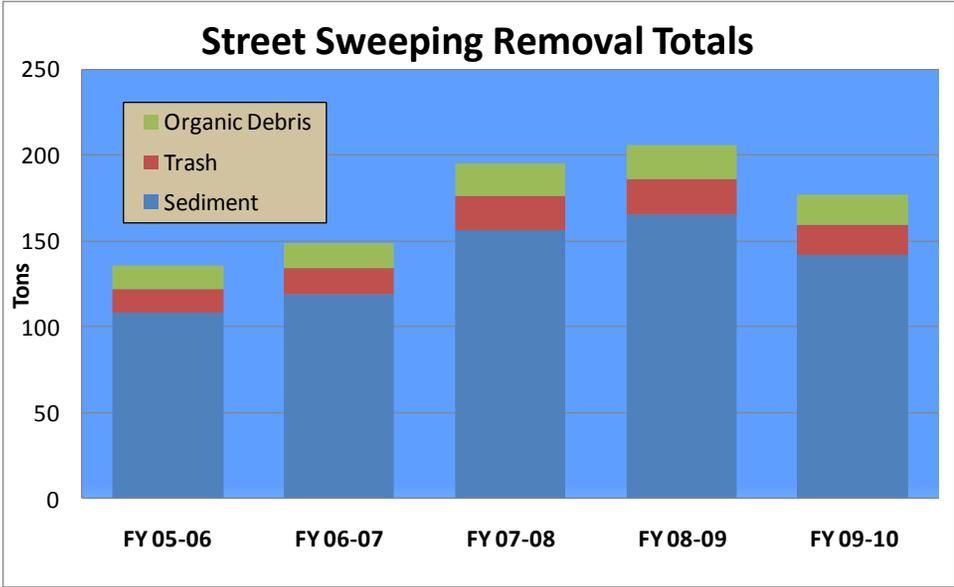


Figure 4.1- The street sweeping totals above are presented by fiscal year. Street sweeping is contracted through Clean Streets and EDCO. The City maintains approximately 127.5 miles of curbed streets and uncurbed roads located throughout the City. Sweeping activities collected 177 tons of materials during the reporting period.

Figure 4.3-MS4 Cleaning Totals

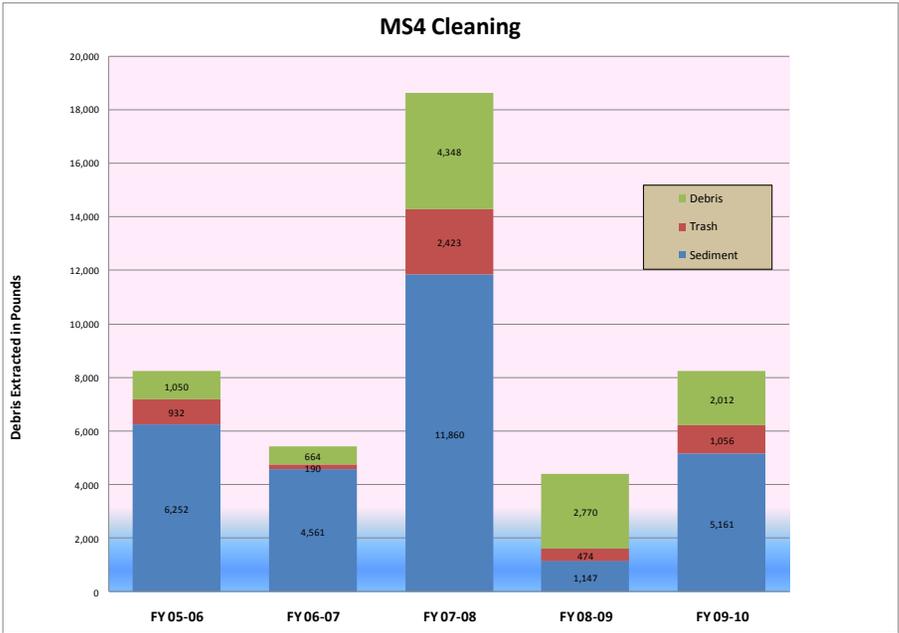


Figure 4.2- The MS4 cleaning totals above are presented by fiscal year. The City endeavors to clean 100% of the MS4 between the months of May through September. The MS4 system includes 117 catch basins, 7 open drain facilities, and approximately 5 miles of underground pipe. The Sewer Division cleaned 8,230 pounds of materials out of the MS4 system during FY 2009-10.

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 Removed (lbs.) | Materials Collected (lbs.) | | | | Volume Used % of Total |
|---------------|---|---|--|-----------|----------------------|-----------------|-------------------|---------|------------------|---------------------------------|----------------------------|--------------|--------------|------------|------------------------|
| | | | | | | | Inspected | Cleaned | Boom(s) Replaced | | Sediment | Trash | Organics | Other | |
| SDF1 | Grate Inlet Skimmer Box 18" X 18" Bio-sorb oil absorbing polymers for hydrocarbon removal | 495 Tenth St. | Public Works Yard (Rear of Yard) | 910.20 | 13-Oct-03 | 23-Sep-09 | X | X | X | 0.1 | 0.0 | | 0.0 | 1% | |
| | | | | | | 2-Dec-09 | X | X | | 0.1 | 0.0 | 0.0 | 2% | | |
| | | | | | | 18-Mar-10 | X | X | X | 0.1 | 0.0 | 0.0 | 0% | | |
| | | | | | | 22-Jun-10 | X | X | | 1.0 | 0.3 | 0.3 | 0.3 | 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 Lot) | 910.20 | 13-Oct-03 | 23-Sep-09 | X | X | X | 0.1 | 0.0 | | 0.0 | 1% | |
| | | | | | | 2-Dec-09 | X | X | | 0.1 | 0.0 | 0.0 | 1% | | |
| | | | | | | 18-Mar-09 | X | X | X | 50.0 | 46.7 | | 3.3 | 30% | |
| | | | | | | 22-Jun-10 | X | X | | 10.0 | 5.0 | | 5.0 | 5% | |
| 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 | 23-Sep-09 | X | X | X | 4.0 | 0.4 | | 3.6 | 10% | |
| | | | | | | 2-Dec-09 | X | X | | 18.0 | 4.5 | | 13.5 | 20% | |
| | | | | | | 18-Mar-09 | X | X | X | 50.0 | 16.7 | | 33.3 | 30% | |
| | | | | | | 22-Jun-10 | X | X | | 45.0 | 11.3 | | 33.8 | 20% | |
| 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 | 23-Sep-09 | X | X | X | 0.2 | 0.1 | 0.1 | 0.1 | 2% | |
| | | | | | | 2-Dec-09 | X | X | | 0.1 | 0.0 | | 0.0 | 1% | |
| | | | | | | 18-Mar-09 | X | X | X | 0.1 | 0.0 | 0.0 | 0.0 | 1% | |
| | | | | | | 22-Jun-10 | X | X | | 0.5 | 0.2 | 0.2 | 0.2 | 10% | |
| SDF5 | Grate Inlet Skimmer Box 24" X 30" Bio-sorb oil absorbing polymers for hydrocarbon removal | 1075 8th St. | Marina Vista Center | 911.11 | 13-Jan-03 | 23-Sep-09 | X | X | X | 3.0 | 0.2 | | 2.8 | 30% | |
| | | | | | | 2-Dec-09 | X | X | X | 21.0 | 14.0 | | 7.0 | 30% | |
| | | | | | | 18-Mar-09 | X | X | X | 15.0 | 11.3 | | 3.8 | 20% | |
| | | | | | | 22-Jun-10 | X | X | | 8.0 | 2.7 | 2.7 | 2.7 | 10% | |
| 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 | 23-Sep-09 | X | X | | 1.5 | 0.2 | | 1.4 | 10% | |
| | | | | | | 2-Dec-09 | X | X | | 0.0 | 0.0 | | 0.0 | 1% | |
| | | | | | | 18-Mar-09 | X | X | X | 6.0 | 0.6 | | 5.4 | 20% | |
| | | | | | | 22-Jun-10 | X | X | | 1.0 | 0.3 | 0.3 | 0.3 | 0.3 | 5% |
| SDF7 | Pipe Skimmer 24" X 24" Bio-sorb oil absorbing polymers for hydrocarbon removal | 1459 Hemlock | Behind Apartment City Easement | 911.11 | 12-Jan-05 | 23-Sep-09 | X | | | 0.0 | | | | 0% | |
| | | | | | | 2-Dec-09 | X | X | | 0.1 | | 0.0 | 0.0 | 0% | |
| | | | | | | 18-Mar-09 | X | X | | 0.4 | 0.1 | 0.1 | 0.1 | 10% | |
| | | | | | | 22-Jun-10 | X | X | | 0.4 | 0.2 | | 0.2 | 10% | |
| SDF8 | KriStar, Flo Guard Plus Catch Basin Insert 18" X 36" Hydrocarbon absorption boom | 839 10 St. Alley east of 10th St. between Elm & Donax | City Alley | 910.20 | 3-Nov-05 | 23-Sep-09 | X | X | X | 1.0 | 0.2 | 0.4 | 0.4 | 5% | |
| | | | | | | 2-Dec-09 | X | X | | 1.0 | 0.3 | 0.3 | 0.3 | 1% | |
| | | | | | | 18-Mar-09 | X | X | X | 6.0 | 1.2 | 1.8 | 3.0 | 10% | |
| | | | | | | 22-Jun-10 | X | X | | 6.0 | 3.0 | | 3.0 | 10% | |
| SDF9 | 2 Grate Inlet Skimmer Boxes 24" X 36" Hydrocarbon absorption boom | Alley abutting 8th St 100 yd. south of Palm | City Alley | 910.20 | 22-Feb-07 | 23-Sep-09 | X | X | X | 0.5 | 0.3 | 0.1 | 0.1 | 1% | |
| | | | | | | 2-Dec-09 | X | X | | 15.0 | 1.5 | 1.5 | 12.0 | 10% | |
| | | | | | | 18-Mar-09 | X | X | X | 50.0 | 16.7 | 16.7 | 16.7 | 30% | |
| | | | | | | 22-Jun-10 | X | X | | 20.0 | 6.7 | 6.7 | 6.7 | 10% | |
| SDF10 | Grate Inlet Skimmer Box 32" X 40" Hydrocarbon absorption boom | Alley b/w 8th St. & Delaware St. just south of Palm Commercial Ctr. | City Alley | 910.20 | 5-Feb-07 | 23-Sep-09 | X | X | X | 0.8 | 0.3 | 0.3 | 0.3 | 1% | |
| | | | | | | 2-Dec-09 | X | X | | 4.0 | 1.3 | 1.3 | 1.3 | 1% | |
| | | | | | | 18-Mar-09 | X | X | X | 140.0 | 70.0 | | 70.0 | 10% | |
| | | | | | | 22-Jun-10 | X | X | | 30.0 | 7.5 | | 22.5 | 20% | |
| SDF11 | Grate-Inlet Box 24" X 36" Hydrocarbon absorption boom | Curb inlet at SW Corner 9th St. / Palm Ave. | Curb Inlet | 910.20 | 22-Feb-07 | 23-Sep-09 | X | X | X | 3.0 | 0.1 | 2.7 | 0.2 | 50% | |
| | | | | | | 2-Dec-09 | X | X | | 25.0 | 0.5 | 19.5 | 5.0 | 100% | |
| | | | | | | 17-Mar-09 | X | X | X | 20.0 | 1.7 | 15.0 | 3.3 | 60% | |
| | | | | | | 22-Jun-10 | X | X | | 35.0 | 2.2 | 30.6 | 2.2 | 80% | |
| SDF12 | KriStar, Flo Guard Plus Catch Basin Insert | 740-798 Florida Street alley behind apartment complex | City Alley | 910.20 | 17-May-07 | 23-Sep-09 | X | X | X | 1.0 | 0.2 | 0.5 | 0.3 | 6% | |
| | | | | | | 2-Dec-09 | X | X | | 15.0 | 6.0 | 3.0 | 6.0 | 25% | |
| | | | | | | 18-Mar-09 | X | X | X | 130.0 | 54.2 | 10.8 | 65.0 | 60% | |
| | | | | | | 22-Jun-10 | X | X | | 25.0 | 12.5 | | 12.5 | 10% | |
| SDF13 | Round Hydro Flow Guard Plus and hydrocarbon booms 24" Diameter Grate and 22" Diameter Inlet | 4th Street at Sports Park | South end of parking lot at Sports Park | 911.11 | 29-Jun-09 | 23-Sep-09 | X | X | X | 3.0 | 1.0 | | 2.0 | 15% | |
| | | | | | | 2-Dec-09 | X | X | | 15.0 | 9.0 | | 6.0 | 25% | |
| | | | | | | 18-Mar-09 | X | X | X | 70.0 | 35.0 | | 35.0 | 80% | |
| | | | | | | 22-Jun-10 | X | X | | 0.1 | 0.1 | 0.0 | 0.0 | 50% | |
| Totals | | | | | | | | | | 851.8 | 345.9 | 114.9 | 390.7 | 0.3 | |

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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 | 2/18/10 | 495 10th Street | Office Building | Corporate Yard | Parking Lot | 910.20 | Otay River | No | Yes | High |
| M-2 | Dempsey Holder Safety Center | 3/15/10 | 950 Ocean Lane | Office Building | Corporate Yard | | 911.11 | Pacific Ocean | Yes | Yes | High |
| M-3 | Fire Station | 3/11/10 | 865 Imperial Beach Boulevard | Office Building | Fire Station | Parking Lot | 911.11 | Tijuana Estuary | Yes | No | High |
| M-4 | City Hall | 3/11/10 | 825 Imperial Beach Boulevard | Office Building | Parking Lot | | 911.11 | Tijuana Estuary | Yes | No | High |
| M-5 | Marina Vista Center | 3/15/10 | 1075 8th Street | Office Building | Parking Lot | | 911.11 | Tijuana Estuary | Yes | No | Low |
| M-6 | I.B. Boys & Girls Club | 6/15/10 | 847 Encina Avenue | Office Building | Parking Lot | | 911.11 | Tijuana Estuary | Yes | No | Med |
| M-7 | Veteran's Park | 3/11/10 | 9th Street / Imperial Beach Boulevard | Park | Parking Lot | | 911.11 | Tijuana Estuary | Yes | No | High |
| M-8 | Reama Park | 6/15/10 | Elder Avenue / Elkwood Avenue | Park | Parking Lot | | 911.11 | Pacific Ocean | Yes | No | Med |
| M-9 | Sports Park & Recreation Center | 3/17/10 | 425 Imperial Beach Avenue | Park | Office Building | Parking Lot | 911.11 | Tijuana Estuary | Yes | No | High |
| M-10 | Teepel Park | 3/11/10 | Calla Avenue / Florida Street | Park | Parking Lot | | 910.20 | Otay River | No | No | Med |
| M-11 | Triangle Park | 6/15/10 | 7th Street / Palm Avenue | Park | | | 910.20 | Otay River | No | No | Med |
| M-12 | Dunes Park | 3/11/10 | 700 Seacoast Drive | Park | Parking Lot | | 910.10 | Pacific Ocean | Yes | Yes | High |
| M-13 | Pier Plaza | 3/11/10 | Evergreen Street / Seacoast Drive | Park | | | 911.11 | Pacific Ocean | Yes | Yes | High |
| M-14 | Imperial Beach Pier | 3/11/10 | Evergreen Street / Seacoast Drive | Miscellaneous | | | N/A | Pacific Ocean | Yes | Yes | High |
| M-15 | Beachfront | 3/11/10 | Mexican Border to YMCA Camp Surf | Miscellaneous | | | N/A | Pacific Ocean | Yes | Yes | Med |
| M-16 | Seacoast & Palm Parking Lot | 5/15/10 | Seacoast Drive & Palm Avenue | Parking Lot | | | 910.10 | Pacific Ocean | Yes | Yes | High |
| M-17 | Elkwood Parking Lot | 3/15/10 | Seacoast Drive & Elkwood Avenue | Parking Lot | | | 911.11 | Pacific Ocean | Yes | Yes | High |
| M-18 | Underground MS4 | Annually | Citywide | MS4 | | | All | All | Yes | Yes | High |
| M-19 | Pump Station #11 (Storm Drain) | 3/11/10 | Palm Avenue street end | MS4 | | | 910.10 | Pacific Ocean | Yes | Yes | High |
| M-20 | Underground Sewer | Annually | Citywide | Sewer | | | All | All | Yes | Yes | High |
| M-21 | Pump Station #1A (Underground) | 6/21/10 | 862 Seacoast Drive | Sewer | | | 910.10 | Pacific Ocean | Yes | Yes | High |
| M-22 | Pump Station #1B (Underground) | 3/18/10 | 1098 Seacoast Drive | Sewer | | | 911.11 | Pacific Ocean | Yes | Yes | High |
| M-23 | Pump Station #2 (Above ground) | 7/16/09 | 1306 South Seacoast Drive | Sewer | | | 911.11 | Tijuana Estuary | Yes | Yes | High |
| M-24 | Pump Station #3 (Underground) | 4/22/10 | 501 Elm Avenue | Sewer | | | 911.11 | Tijuana Estuary | Yes | No | High |
| M-25 | Pump Station #4 (Underground) | 12/17/10 | 755 Delaware Avenue | Sewer | | | 911.11 | Tijuana Estuary | Yes | No | High |
| M-26 | Pump Station #5 (Underground) | 5/20/10 | 133 Dahlia Avenue | Sewer | | | 910.10 | Pacific Ocean | Yes | No | High |
| M-27 | Pump Station #6 (Underground) | 11/19/09 | 498 Rainbow Street | Sewer | | | 910.10 | San Diego Bay | Yes | No | High |
| M-28 | Pump Station #7 (Underground) | 10/15/09 | 504 Oneonta Avenue | Sewer | | | 911.11 | Tijuana Estuary | Yes | No | High |
| M-29 | Pump Station #8 (Underground) | 1/21/10 | 895 Imperial Beach Boulevard | Sewer | | | 911.11 | Tijuana Estuary | Yes | No | High |
| M-30 | Pump Station #9 (Underground) | 8/21/09 | 1025 9th Street | Sewer | | | 911.11 | Tijuana Estuary | Yes | No | High |
| M-31 | Pump Station #10 (Above ground) | 2/13/10 | 814 Cypress Avenue | Sewer | | | 910.20 | Otay River | No | No | High |
| M-32 | Streets | Annually | Citywide | Streets | | | All | All | Yes | Yes | High |
| M-33 | Alleys | Annually | Citywide | Streets | | | All | All | Yes | Yes | High |
| M-34 | Traffic Islands | Annually | Citywide | Streets | | | All | All | Yes | No | Med |
| M-35 | Special Event Venues | As needed | Citywide | Miscellaneous | | | All | All | Yes | Yes | High |
| M-36 | Graffiti Removal | Annually | Citywide | Miscellaneous | | | All | All | Yes | Yes | High |
| M-37 | Serenity Garden | 6/15/10 | 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.

5.2 Outcome Level 1a: Administration of Management Program Activities

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 and implemented the use of the new regional inventory template developed by the Industrial Commercial Copermittee Workgroup. 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. Records are also maintained on each specific business for inspections, corrective actions, and illegal discharges. During the reporting period the City continued to incorporate fats, oils, and grease (FOG) management into the commercial business inspection for restaurants. Lastly, the Environmental Division incorporated an interactive effectiveness assessment into the commercial inspection program to assess the level of knowledge and effectiveness of BMP implementation.

5.3 Outcome Level 1b: Implementation of Management Program Activities

The Environmental Division provides notification and verification of minimum BMPs for commercial businesses, in addition to performing 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. Inspections are conducted and documented as outlined in the *2008 JURMP Section 7.0*.

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.

The following tables and figures presented in this section provide additional information on the implementation and assessment of the Commercial Industrial program element:

- Table 5.1 Provides an overview of the Industrial and Commercial inventory by facility type and priority classification
- Table 5.2 presents and describes targeted FY 2009-10 outcomes and results
- Table 5.3 Commercial Business Inventory FY 2009-10
- Table 5.4 Commercial Business Inspections FY 2009-10
- Table 5.5 Interactive Effectiveness Assessment of Commercial Businesses

5.4 Outcome Level 2: Knowledge and Awareness of Program Implementation by Businesses

Commercial businesses receive education on storm water BMPs through a number of different methods including direct mail before scheduled inspections, face-to-face interaction with City staff during commercial inspections, through dissemination of education material, and through a follow up inspection letter that summarizes the results of the commercial inspection. The City also provides education to businesses during ICID investigations.

Starting this reporting period the Environmental Division incorporated an interactive effectiveness assessment of commercial businesses during the annual storm water inspection at 21 of the 71 high priority businesses. The goal of the assessment is to get beyond BMP verification and assess the level of BMP effectiveness at commercial businesses in the City. General results showed a high level of knowledge among the businesses inspected. The results are outlined in Table 5.5.

5.5 Outcome Level 3: Behaviors and Best Management Practice (BMP) Implementation by Businesses

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.

5.6 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. Source load reductions can be implied from commercial businesses through the proper implementation of BMPs.

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 | 327 | |
| B. Priority Classification Totals | | |
| High | 71 | Imperial Beach Municipal Code 8.30.090 defines commercial businesses as either high or non-high (low) priority. High priority businesses include all food service and auto service related businesses. |
| Low | 256 | |
| Mobile | 46 | Mobile business database is tracked and maintained on the new copermitee online Regional Mobile Business Inventory. |
| C. Inspection Totals | | |
| Commercial Business Inspections | 71 | The Environmental Division conducts all commercial inspections. All high priority businesses receive inspections annually for storm water compliance. Commercial businesses that have a significant storm water violation receive a follow up investigation. |
| Follow Up Inspections | 9 | |
| 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 2009-10 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 - Industrial and Commercial Component Targeted Outcomes and Results

| Industrial and Commercial FY 2009-10 Results | | | |
|---|--|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| LEVEL 1a OUTCOMES (ADMINISTRATION MANAGEMENT PROGRAM ACTIVITIES) | | | |
| a) Modifications to JURMP | | | |
| Update applicable JURMP sections per Permit requirements | No updates were made during reporting period | Complete | Applicable updates were included in <i>JURMP Section 6.0</i> . No significant updates are expected to be necessary during this permit cycle. |
| b) Updates to Program Documentation (Policies, Plans, Procedures, and Forms) | | | |
| Update program documentation for consistency with program updates | Updates made to Commercial Inspection Form and Fats, oils, and grease (FOG) inspection program | Complete | The commercial inspection and assessment form was updated to include an interactive effectiveness assessment to assess the level on knowledge and effectiveness of BMP implementation. The assessment method was originally developed and implemented by Dmax Engineering in past reporting periods and modified for use in Imperial Beach. This was the first time Imperial Beach incorporated an effectiveness assessment into its commercial inspection program. The City also incorporating fats, oils, and grease (FOG) management as part of the commercial business inspection for restaurants. |
| c) Year-End Program Review | | | |
| Complete annual year-end program review | Review program for effectiveness and efficiency | Complete | 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. |
| d) Updates to Training Program | | | |
| Update training materials for consistency with <i>2008 JURMP Section 10.0</i> | Made updates to education materials and staff | 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. During the reporting period the City also hired a new Environmental Specialist who provided education to commercial businesses while conducting annual inspections. |

Table 5.2 - Industrial and Commercial Component Targeted Outcomes and Results

| Industrial and Commercial FY 2009-10 Results | | | |
|---|---|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| e) Updates to Commercial Inventor or Prioritization | | | |
| Update commercial inventory and prioritization | Routine updates made to the commercial inventory | Complete | Regular updates were made to the commercial and industrial business inventory. Starting this reporting period the City updated its commercial inventory to match the regional copermittee standard template. Updates were also made to the prioritization ranking so that all food or automotive related businesses get categorized as high priority. The regional online mobile business database was also maintained online. |
| LEVEL 1b OUTCOMES (IMPLIMENTATION OF MANAGEMENT PROGRAM ACTIVITIES) | | | |
| a) Jurisdictional Requirements for Commercial Businesses | | | |
| Require commercial and industrial businesses to implement BMPs and verify through inspections | Notified businesses through mail, conducted inspections, responded to ICIDs, and provided education materials | 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. The commercial inspection program and ICID program are the mechanisms used to educate businesses on BMPs. |
| b) Confirmation of Designated Minimum BMPs | | | |
| Verify the implementation of minimum BMPs for commercial businesses | Conducted commercial inspections and follow up inspections to verify BMPs | Complete | The City verifies the implementation of minimum BMPs at commercial businesses through the implementation of the commercial inspection program. |

Table 5.2 - Industrial and Commercial Component Targeted Outcomes and Results

| Industrial and Commercial FY 2009-10 Results | | | |
|--|---|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| c) Confirmation of Commercial Inspections | | | |
| Verify that commercial inspections achieve BMP compliance | Inspected all high priority commercial businesses | Complete | Starting this reporting period the Environmental Division incorporated an interactive effectiveness assessment of commercial businesses during the annual storm water inspection. The goal of the assessment is to get beyond BMP verification and assess the level of BMP effectiveness. |
| d) Justification for Commercial Inspection Prioritization | | | |
| Provide rationale for the businesses that were inspected | IBMC 8.30.090 defines commercial businesses as either high or non-high (low) priority | Complete | High priority businesses include at a minimum all food service and auto service related businesses in the City. Businesses that have a treatment control BMPs also receive inspections as well as businesses that cause an ICID. |
| e) Efforts Made to Notify Businesses of BMPs | | | |
| Describe efforts made to notify businesses of BMPs | Notification made through pre mail notification, inspections, follow up inspections, and follow up letter | Complete | During this reporting period the City notified all high priority and mobile businesses of minimum BMPs through mail. High priority businesses then received a storm water inspection and a follow up inspection in the case of a violation. A post inspection letter is then mailed to the business outlining the results of the inspection. |
| f) Third Party Inspections | | | |
| Describe third party inspection results | None | None | All commercial inspections are conducted through the Environmental Division |

Table 5.2 - Industrial and Commercial Component Targeted Outcomes and Results

| Industrial and Commercial FY 2009-10 Results | | | |
|--|---|--|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| g) General Industrial Permit Non-Filers | | | |
| Describe steps taken to identify non-filers under the General Industrial Permit | None | Complete | The City did not have any industrial businesses during the reporting period. |
| h) Mobile Businesses | | | |
| Describe efforts made to address mobile businesses | Mailed letter and brochure of minimum BMPs to mobile businesses | Complete | The City contacted each mobile business through mail with a letter and brochure that outlines the minimum BMP requirements. Mobile businesses do not typically receive annual inspections. The Environmental Division informally inspects mobile businesses while responding to illegal discharge reports and public service requests. |
| i) Special Investigations | | | |
| Not targeted | Conducted interactive assessment of commercial businesses during inspections | Complete | Starting this reporting period the Environmental Division incorporated an interactive effectiveness assessment of commercial businesses during the annual storm water inspection. The goal of the assessment is to get beyond BMP verification and assess the level of BMP effectiveness. |
| LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY COMMERCIAL BUSINESSES) | | | |
| Establish a baseline for knowledge of BMPs by commercial businesses | Conducted interactive assessment of commercial businesses during annual inspections | Assessment results provided in Table 5.5 | Starting this reporting period the Environmental Division incorporated an interactive effectiveness assessment of commercial businesses during the annual storm water inspection. The goal of the assessment is to get beyond BMP verification and assess the level of BMP effectiveness. |

Table 5.2 - Industrial and Commercial Component Targeted Outcomes and Results

| Industrial and Commercial FY 2009-10 Results | | | |
|---|--|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY COMMERCIAL BUSINESSES) | | | |
| a) Commercial Business BMP Implementation | | | |
| Inspect businesses for compliance | 71 sites inspected and 9 follow up inspections | 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. |
| Notify mobile and fixed commercial businesses of BMP requirements | 71 fixed commercial and 46 Mobile Businesses contacted through mail | 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. |
| b) Violations and Enforcement Actions | | | |
| Number of violations and enforcement actions to achieve compliance. | Follow up inspections required at 9 businesses. City also had 26 ICID cases which resulted in 6 NOVs | 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. |
| LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM MUNICIAPL FACILITIES AND ACTIVITIES) | | | |
| a) BMP Implementation | | | |
| Load reductions from proper BMP implementation | 60 out of 69 high priority businesses implemented proper storm water BMPs | Complete | Source load reductions are not easily tracked from commercial businesses but can be implied through proper implementation of BMPs. |

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Table 5.4 - Commercial Business Inspections FY 2009-10

| Facility Name | Address | Business Phone Number - Calc | Establishment Class | Date Inspected | Result | Follow Up Inspect |
|--------------------------------|------------------------|------------------------------|---------------------|----------------|-----------|-------------------|
| 13TH ST MARKET | 1126 13TH ST | (619) 424-8255 | High | 12/2/2009 | Follow Up | |
| 7-ELEVEN STORE # 24344B-2131 | 1311 PALM AVE | (619) 575-6081 | High | 12/9/2009 | Follow Up | 1/4/2010 |
| 7-ELEVEN STORE #23982A-2131 | 1303 IMPERIAL BEACH BL | (619) 000-0000 | High | 12/15/2009 | OK | |
| ALBERTO'S TACO SHOP | 1183 13TH ST | (619) 429-4802 | High | 12/15/2009 | OK | |
| ALL AMERICAN CAR WASH IB | 1158 PALM AVE | (619) 429-7000 | High | 12/17/2009 | OK | |
| ANCHOR MOTORS | 740 PALM AVE | (858) 945-7762 | High | 11/17/2009 | OK | |
| AROMA THAI RESTAURANT | 757 SEACOAST DR | (619) 941-1656 | High | 10/27/2009 | OK | |
| BEACH SIDE STATION | 681 HIGHWAY 75 | (619) 424-3366 | High | 12/16/2009 | Follow Up | 12/16/2009 |
| BERNARDO SHORES | 500 HIGHWAY 75 | (619) 429-9000 | High | 11/17/2009 | OK | |
| BEACH CLUB GRILLE | 710 SEACOAST DR | | 0 High | 12/21/2009 | OK | |
| BIG KAHUNA'S PIZZA N STUFFS | 600 PALM AVE | (619) 429-5224 | High | 11/16/2009 | OK | |
| BURGER KING #806 | 1180 PALM AVE | (619) 429-3180 | High | 12/17/2009 | OK | |
| C.H. DONUTS | 1070 13TH ST | (619) 575-3001 | High | 12/2/2009 | OK | |
| CARL'S JR. #585 | 700 13TH ST | (619) 423-5025 | High | 12/9/2009 | OK | |
| COW-A-BUNGA CA GLACIER FNAM | 10 EVERGREEN AVE | (619) 628-0508 | High | 10/26/2009 | OK | |
| CROSSROAD PETROLEUM INC. | 1185 PALM AVE | (619) 429-4628 | High | 12/17/2009 | Follow Up | |
| DEPENDABLE CARBURETOR EXCHANGE | 660 EMORY ST | (619) 424-7453 | High | 11/19/2009 | OK | |
| DON PANCHO'S MEXICAN FOOD | 690 HIGHWAY 75 | (619) 429-7034 | High | 12/16/2009 | OK | |
| DOS MUNDOS TACO SHOP | 1004 PALM AVE | (619) 397-9750 | High | 12/16/2009 | OK | |
| ECONO LUBE N' TUBE | 772 13TH ST | (619) 429-8882 | High | 12/1/2009 | OK | |
| EL CILANTRO MEXICAN FOOD | 764 13TH ST | (619) 429-7492 | High | 12/1/2009 | OK | |
| EL TAPATIO CATERING | 667 SILVER STRAND BL | (619) 423-2440 | High | 12/15/2009 | OK | |
| EL TAPATIO RESTAURANT INC | 260 PALM AVE | (619) 423-3443 | High | 12/15/2009 | OK | |
| EL ZASON | 633 9TH ST | (619) 462-6350 | High | 12/16/2009 | OK | |
| G & M OIL #177 | 907 PALM AVE | (619) 429-3962 | High | 12/16/2009 | OK | |
| GENES' AUTOMOTIVE | 1085 PALM AVE | (619) 498-0820 | High | 12/17/2009 | OK | |
| GIANT PIZZA KING #4 | 1070 13TH ST | (619) 575-2622 | High | 12/16/2009 | OK | |
| GIANT PIZZA KING #5 | 600 PALM AVE | (619) 423-7601 | High | 12/17/2009 | Follow Up | 12/17/2009 |
| HAWKINS AUTO BODY | 519 FLORIDA ST | (619) 429-3960 | High | 11/30/2009 | OK | |
| HS CARS COMPANY INC | 1333 PALM AVE | (619) 429-4983 | High | 11/30/2009 | OK | |
| I.B. PIZZA | 1293 IMPERIAL BEACH BL | (619) 575-3330 | High | 12/1/2009 | OK | |
| IB FORUM | 1079 SEACOAST DR | (619) 429-7507 | High | 10/26/2009 | OK | |
| IMPERIAL BEACH ULTRAMAR | 1300 IMPERIAL BEACH BL | (619) 423-7770 | High | 12/15/2009 | OK | |
| IMPERIAL DONUTS + | 1002 PALM AVE | (619) 575-1830 | High | 12/16/2009 | OK | |
| KATY'S CAFE | 704 SEACOAST DR | (619) 863-5524 | High | 12/21/2009 | OK | |
| K-C'S CHINESE FOOD | 1299 IMPERIAL BEACH BL | (619) 429-5418 | High | 12/1/2009 | OK | |
| KFC CORP #Y450025 | 1056 13TH ST | (619) 424-3492 | High | 12/1/2009 | OK | |
| L & M TIRE CO./ EXPRESS TIRE | 950 PALM AVE | (619) 429-3600 | High | 11/19/2009 | OK | |
| LA POSTA MARKET #2 | 1266 IMPERIAL BEACH BL | (619) 423-6363 | High | 12/16/2009 | Follow Up | 1/4/2009 |
| MARCO'S & RED HAWK | 1205 PALM AVE | (611) 424-3636 | High | | | |
| MARISA'S MEXICAN SEAFOOD GRILL | 285 PALM AVE | (619) 227-7424 | High | 12/15/2009 | OK | |
| MASON'S ALIGNMENT-BRAKE-MUFFLE | 975 PALM AVE | (619) 424-5161 | High | 8/24/2009 | OK | |
| MCDONALDS/SCAROB INC. | 1135 PALM AVE | (619) 423-8811 | High | 12/17/2009 | OK | |
| MEIJO SUSHI, INC. | 600 PALM AVE | (619) 429-4373 | High | 11/16/2009 | OK | |
| MICKIES BAR AND GRILL | 220 PALM AVE | (619) 575-9805 | High | 12/22/2009 | OK | |
| MZM SEACOAST BISTRO, LP | 875 SEACOAST DR | (619) 424-5800 | High | 12/23/2009 | OK | |
| NFAROOQI ENT. LLC/JACK IN BOX | 890 PALM AVE | (619) 325-1801 | High | 8/21/2009 | OK | |
| PIZZA INDUSTRY/DOMINO'S PIZZA | 1307 IMPERIAL BEACH BL | (619) 575-2226 | High | 12/15/2009 | OK | |
| PRECISION AUTO BODY & COLLISIO | 989 PALM AVE | (619) 726-7932 | High | 12/16/2009 | OK | |
| PRECISION FOREIGN | 1240 PALM AVE | (619) 575-1767 | High | 12/9/2009 | OK | |
| PRETZLES AND MUCH MORE | 10 EVERGREEN AVE | (619) 591-9344 | High | 10/26/2009 | OK | |
| RODRIGO'S MEXICAN FOOD | 600 PALM AVE | (619) 425-9076 | High | 11/16/2009 | OK | |
| ROLANDO'S TACO SHOP #5 | 805 SEACOAST DR | (619) 239-9825 | High | 12/21/2009 | OK | |
| SANTANA MEXICAN FOOD | 1337 PALM AVE | (619) 251-6743 | High | 11/30/2009 | OK | |
| SEACOAST PIZZA | 807 SEACOAST DR | (619) 423-1111 | High | 12/21/2009 | OK | |
| SIESTA RV PARK, INC. | 409 PALM AVE | (619) 420-7090 | High | 12/22/2009 | OK | |
| SOMBRERO MEXICAN FOOD | 189 PALM AVE | (619) 424-8822 | High | 12/22/2009 | OK | |
| SOPHISTICATED AUTO | 987 PALM AVE | (619) 423-7729 | High | 3/10/2009 | OK | |
| STARJUST DONUT SHOP | 698 HIGHWAY 75 | (424) 000-6200 | High | 12/17/2009 | OK | |
| SUBSMART DELI-FRESH | 1231 PALM AVE | (619) 829-1780 | High | 12/9/2009 | OK | |
| SUBWAY 20578 | 876 SEACOAST DR | (858) 337-1539 | High | 10/26/2009 | OK | |
| THE BRIDGE | 874 SEACOAST DR | (619) 423-6610 | High | 10/26/2009 | OK | |
| THE SCOREBOARD | 951 PALM AVE | (619) 424-9909 | High | 12/15/2009 | OK | |
| THE TINFISH RESTAURANT | 910 SEACOAST DR | (619) 628-8414 | High | 10/26/2009 | OK | |
| THE WAVE CAFE | 809 SEACOAST DR | (619) 423-9900 | High | 12/21/2009 | OK | |
| TITO AUTO SERVICE | 1335 PALM AVE | (619) 423-8690 | High | 11/30/2009 | OK | |
| TNT SURFBOARDS | 536 13TH ST | (619) 575-2303 | High | 11/30/2009 | OK | |
| TUNES LUBES ETC. | 741 PALM AVE | (619) 575-6087 | High | 11/17/2009 | Follow Up | 12/16/2009 |
| WALLY'S IGA | 836 PALM AVE | (619) 424-8129 | High | 12/16/2009 | OK | |
| WIENERSCHNITZEL #358 | 1253 PALM AVE | (619) 423-7211 | High | 12/9/2009 | Follow Up | 1/4/2010 |
| WOODYS AUTO CARE | 200 PALM AVE | (619) 279-6525 | High | 12/22/2009 | Follow Up | |
| YE OLDE PLANK INN | 24 PALM AVE | (423) 000-5976 | High | 12/22/2009 | OK | |

Table 5.5 - Interactive Effectiveness Assessment of Commercial Businesses

| Name of Facility | Type | Have you heard of our storm water program before? What have you heard? | When water leaves your site, where does it go? | Is Runoff Treated | What is the difference between the storm drain system and the sanitary sewer? | Runoff from your site eventually reaches what water body. | Name some key pollutants? | What are examples of actions you can take? | Overall Survey | BMP Implementation | Outcome Level Achieved |
|--------------------------------|-------------------------|--|--|-------------------|---|---|---------------------------|--|----------------|--------------------|------------------------|
| Beach Club Grille | Food Service | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 4 |
| Katy's Café | Food Service | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 4 |
| Wienerschnitzel | Food Service | 5 | 2 | 0 | 0 | 0 | 0 | 0 | 1 | 4.5 | 3 |
| Subsmart | Food Service | 3 | 3 | 0 | 0 | 0 | 0 | 3 | 1.2857 | 5 | 3 |
| Econo Lube N' Tube | Auto Service | 0 | 0 | 5 | 5 | 5 | 0 | 3 | 2.5714 | 5 | |
| CH Donuts | Food Service | 0 | 5 | 5 | 5 | 5 | 0 | 5 | 3.5714 | 5 | 4 |
| Santana Mexican | Food Service | 0 | 0 | 0 | 0 | 0 | 5 | 1 | 0.8571 | 5 | 3 |
| Hawkins Auto Body | Auto Service | 2 | 5 | 5 | 5 | 1 | 5 | 5 | 4 | 5 | 4 |
| TNT Surfboard | Manufacturing/Finishing | 0 | 5 | 5 | 5 | 5 | 5 | 5 | 4.2857 | 5 | 4 |
| Tito Auto Service | Auto Service | 4 | 5 | 4 | 5 | 5 | 5 | 5 | 4.7143 | 5 | 4 |
| L&M Tire | Auto Service | 0 | 5 | 5 | 5 | 4 | 5 | 5 | 4.1429 | 5 | 4 |
| Dependable Carburator Exchange | Auto Service | 5 | 5 | 5 | 5 | 5 | 0 | 2 | 3.8571 | 5 | 4 |
| Imperial Donuts | Food Service | 5 | 5 | 0 | 5 | 5 | 5 | 5 | 4.2857 | 4.5 | 4 |
| Wally's IGA | Food Service | 5 | 5 | 5 | 5 | 4 | 5 | 3 | 4.5714 | 4.5 | 4 |
| Anchor Motors | Auto Service | 5 | 5 | 5 | 1 | 5 | 5 | 1 | 3.8571 | 5 | 4 |
| Tunes Lubes ETC | Auto Service | 1 | 2 | 1 | 1 | 1 | 0 | 5 | 1.5714 | 5 | 3 |
| Bernardo Shores | RV | 5 | 5 | 5 | 5 | 5 | 0 | 5 | 4.2857 | 5 | 4 |
| Beach Side Station | Gas Station | 1 | 3 | 5 | 5 | 5 | 5 | 1 | 3.5714 | 4.5 | 4 |
| Dominos Pizza | Food Service | 0 | 5 | 5 | 5 | 4 | 5 | 3 | 3.8571 | 5 | 4 |
| 7 Eleven (IB BL) | Gas Station | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 4 |
| Sombrero Mexican | Food Service | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 4 |
| | Average | 2.904761905 | 4.047619048 | 3.80952381 | 3.904761905 | 3.761904762 | 3.333333333 | 3.666666667 | 3.6327 | 4.90476190 | 3.8 |
| | STD Deviation | 2.27826166 | 1.687488977 | 2.08851736 | 2.022492569 | 1.972429008 | 2.415229458 | 1.74164673 | 1.3579 | 0.201186 | 0.436435 |

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.

6.2 Outcome Level 1a: Administration of Management Program Activities

The City's implementation and assessment strategy for the Residential Component is described in the *2008 JURMP Section 8.0*. During the reporting period no updates were made to the high priority residential area inventory. All other program planning and administration elements remain unchanged from the *2008 JURMP Section 8.0*.

6.3 Outcome Level 1b: Implementation of Management Program Activities

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. The City also participated as Co-Chair in the Education and Residential Sources Workgroup and Chair of the Underserved Target Audience sub-workgroup.

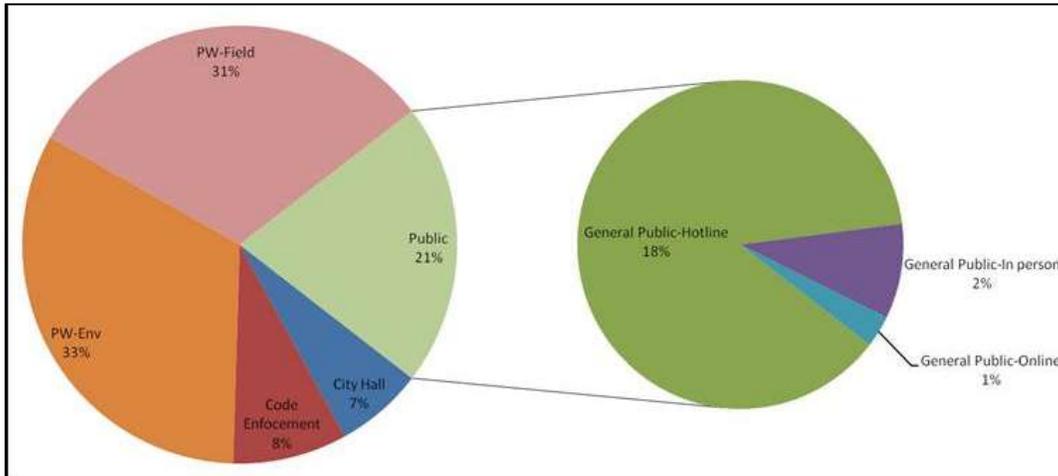
The following tables and figures presented in this section provide additional information on the implementation and assessment of the Municipal program element:

- Table 6.1 Provides an overview of the residential component as it was implemented
- Table 6.2 presents and describes targeted FY 2009-10 outcomes and results
- Figure 6.1 Show the referral source for ICIDs investigations

6.4 Outcome Level 2: Knowledge and Awareness of Program Implementation by Residents

Knowledge and awareness of the storm water program by residents is best assessed through the City's response to illegal connections and illicit discharge (ICID) investigations. Figure 6.1 below shows that 21% of the City's ICID cases continue to come from the public. When expanded to include sources other than the Environmental Division, the number of referrals increases to 66%. This shows that the City is effective in making different stakeholders aware of the importance of reporting storm water violations and more importantly aware of how their own actions effect water quality.

Figure 6.1 - Referral Source for ICID Investigations



6.5 Outcome Level 3: Behaviors and Best Management Practice (BMP) Implementation by Residents

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.

6.6 Outcome Level 4: Source Load Reductions

The City continues to quantify load reductions whenever feasible for disposal of household hazardous waste, used oil, and special clean up events. Pest waste collected by the Ocean Blue foundation is also estimated. The City does not normally track individual source load reductions to receiving waters from residential areas or activities but load reductions can be implied by proper implementation of BMPs.

Table 6.1 – Overview of Residential Component

| Category | Pounds | Number | Description |
|--|---|--------|---|
| 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 | 2,637 | --- | <p>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. Residents can also drop off used oil at the Auto Zone located at 13th and Palm. The City coordinates used oil disposal that is part of CalRecycle Used Oil Block Grant with the City of Chula Vista. The amount of waste dropped off by Imperial Beach residents is provided in the table to the left.</p> <p>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.</p> |
| Acid, Base, Oxidizer, and PCB-containing | 96 | --- | |
| Reclaimable (Antifreeze, Car batteries, Latex Paint, Used Oil and filters) | 3,763 | --- | |
| Other HHW | 816 | | |
| Universal and Electronic Waste | 3,025 | | |
| Total Waste Disposed | 10,337 | | |
| | | | |
| JURMP Sections | Description of FY 2009-10 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 - Residential Component Targeted Outcomes and Results

| Residential FY 2009-10 Results | | | |
|---|---|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| LEVEL 1a OUTCOMES (ADMINISTRATION MANAGEMENT PROGRAM ACTIVITIES) | | | |
| a) Modifications to JURMP | | | |
| Update applicable JURMP sections per Permit requirements | No updates made during FY 2009-10 | Complete | Applicable updates were included in <i>JURMP Section 6.0</i> . No significant updates are expected to be necessary during this permit cycle. |
| b) Updates to Program Documentation (Policies, Plans, Procedures, and Forms) | | | |
| Update program documentation for consistency with program updates | No updates made during FY 2009-10 | Complete | No updates made this reporting period. |
| c) Year-End Program Review | | | |
| Complete annual year-end program review | Review program for effectiveness and efficiency | In progress | 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. |
| LEVEL 1b OUTCOMES (IMPLIMENTATION OF MANAGEMENT PROGRAM ACTIVITIES) | | | |
| a) Jurisdictional Requirements for Residential Areas | | | |
| Identify high threat to water quality areas | Update not needed | Complete | 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 <i>2008 JURMP Section 8.0</i> provides a list of high threat to water quality activities. |

Table 6.2 - Residential Component Targeted Outcomes and Results

| Residential FY 2009-10 Results | | | |
|---|--|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| b) Confirmation of Designated Minimum BMPs | | | |
| 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. |
| c) Facilitate Proper Disposal of Household Hazardous Waste and Used Oil | | | |
| Facilitate proper management and disposal of used oil and 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. |
| d) 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. |
| e) Evaluate Methods of Oversight for 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 deficiencies | Complete | Operated a Storm Water Hotline (619-424-4095) during the reporting period. The City received 28 reports on the Storm Water Hotline (619-424-4095) for storm water violations in residential areas. The Environmental Division responded to another 65 residential violations reported by City staff. The City also operates an online complaint form and received 1 residential complaint. City staff also identified storm water BMP deficiencies or violations while conducting residential neighborhood inspections for sewer and street maintenance. |

Table 6.2 - Residential Component Targeted Outcomes and Results

| Residential FY 2009-10 Results | | | |
|---|---|--|---|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| f) Regional Residential Education Program | | | |
| Participate in Regional Residential Education Program | Held co-chair position of the Education and Residential Sources Workgroup and chair position of the Underserved Target Audience Sub-workgroup | On going | 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. |
| g) Special Investigations | | | |
| Not targeted | None | None | Special investigations were not conducted in FY 2009-10, and are not routinely conducted as part of the implementation strategy for this program element. |
| LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY RESIDENETS) | | | |
| Establish a baseline for knowledge of BMPs implementation by residents | No additional assessments were targeted at residents outside of education activities | Assessment results provided in Section 8.0 for residential and general public outreach | Knowledge and awareness of storm water issues by residents is assessed through the education program. The City uses brochures, special events, presentations, and ICID investigations as tools to educate local residents on storm water. |

Table 6.2 - Residential Component Targeted Outcomes and Results

| Residential FY 2009-10 Results | | | | |
|--|---|-------------------|---|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation | |
| LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY RESIDENTS) | | | | |
| a) BMP Implementation | | | | |
| Facilitate pet waste program with the Ocean Blue Foundation | 10 pet waste bag dispensers are maintained by the Ocean Blue Foundation | Complete | 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. The City Council supports the foundation through an annual community grant. | |
| Cleanup activities in residential areas | Implemented cleanup activities as part of the Municipal Component | Complete | Under the Municipal Component of the JURMP the City conducts street sweeping, alley sweeps, and cleanup activities in residential neighborhoods. | |
| b) Violations and Enforcement Actions | | | | |
| Number of violations and enforcement actions to achieve compliance | Responded to a total of 94 ICID cases from residents | Complete | The City tracks statistics for storm water violations. The City received 28 reports on the Storm Water Hotline (619-424-4095) for storm water violations in residential areas. The Environmental Division responded to another 65 residential violations identified by City staff. The City also operates an online complaint form and complaints reported in person. | |
| LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM RESIDENTIAL AREAS AND ACTIVITIES) | | | | |
| a) BMP Implementation | | | | |
| Household hazardous waste (HHW) collection | 10,377 pounds of HHW collected | Year | Pounds | 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. |
| | | 2008 | 6,000 | |
| | | 2009 | 10,367 | |
| | | 2010 | 10,377 | |

Table 6.2 - Residential Component Targeted Outcomes and Results

| Residential FY 2009-10 Results | | | | | |
|--|---|-------------------|---------------|-------------|---|
| Targeted Outcome | Implementation Result | Assessment Result | | | Explanation |
| Used oil collection | 3,763 pounds of Reclaimable (Antifreeze, Car batteries, Latex Paint, Used Oil and filters) collected | Year | Pounds | | 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. |
| | | 2008 | 2,110 | | |
| | | 2009 | 2,173 | | |
| | | 2010 | 3,763 | | |
| Universal and electronic waste collection | 3,025 pounds of electronic and universal waste collected | Year | Pounds | | The City facilitates the proper management and disposal of universal and electronic wastes. |
| | | 2009 | 2,433 | | |
| | | 2010 | 3,025 | | |
| Pet waste collection | 10 pet waste bag dispensers; 72,800 bags replaced, and an estimate of 18,200 lbs of pet waste collected | Complete | | | 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. The City Council supports the foundation through an annual community grant. |
| Special event recycling and waste management | Home Front Cleanup event had 822 participants and collected 175.6 tons of materials | Year | No. | Tons | The City holds an annual Home Front Cleanup event. The Home Front Clean Up had 822 participants and disposed a total of 175.6 tons of materials. That includes 19.7 tons of green waste, 33.4 tons of metal, and 32.4 tons of concrete that was recycled. |
| | | 2009 | 732 | 154.3 | |
| | | 2010 | 822 | 175.6 | |

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 communities. 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. 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 Outcome Level 1a: Administration of Management Program Activities

The City's implementation and assessment strategy for the Education Component is described in the *2008 JURMP Section 10.0*. During the reporting period 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 educational guidance documents, which are continuously updated throughout the year. The City also continues to seek for ways to expand and improve the effectiveness assessment of the education program.

8.3 Outcome Level 1b: Implementation of Management Program Activities

The Environmental Division oversees the implementation and assessment of the Education Component for the five targeted communities. The following tables and figures presented in this section provide additional information on the implementation and assessment of the Education program element:

- Table 8.1 Provides an overview of the Education program
- Table 8.2 presents and describes targeted FY 2009-10 outcomes and results
- Table 8.3 provides the education activity inventory by target community for FY 2009-10

8.4 Outcome Level 2: Knowledge and Awareness of Program Implementation by Target Community

The City implements 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 the reporting period the Environmental Division implemented a variety of techniques to capture changes in knowledge and awareness among the targeted communities. These techniques include the use of surveys, pre and post test, interactive assessments and evaluations during inspections, and regional assessment programs through the Education and Residential Sources (ERS) Workgroup.

8.5 Outcome Level 3: Behaviors and Best Management Practice (BMP) Implementation by Target Community

The City facilitates changes in behavior and implementation of BMPs by providing continuous education for each target audience using a variety of educational tools and media. The continual saturation of education for each target audience is gradually leading to a greater awareness about storm water pollution and the implementation of pollution prevention BMPs. Gauging the level of effectiveness of the education program from one year to the next is a challenging task because of the gradual nature of behavior change, but the City strives to measure this level of effectiveness and behavior change for each target audience whenever possible. Table 8.3 provides a description of how outcome level 3 is assessed for each targeted community.

8.6 Outcome Level 4: Source Load Reductions

Education is a key component of getting to source load reductions through the implementation of BMPs. Source load reductions are not easily tracked from education activities but can be implied through the proper implementation of BMPs.

Table 8.1 – Overview of Education

| Category | Number | Description |
|---|---|---|
| A. Educational Efforts | | |
| Municipal Departments and Personnel Events | 15 | 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 Publics Works Department during the permitting process, in inspections, and in investigations of illegal discharges. Commercial Site Owners and Operators are trained through scheduled inspections by the Public Works Department Environmental Division, and through investigations of illegal discharges. 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. |
| Public Participation | 8 | |
| Commercial Site Owners and Operators Training Events | 3 | |
| Residential Community and General Public Outreach Events | 15 | |
| Underserved Community | 2 | |
| School Children Outreach Events | 6 | |
| JURMP Sections | Description of FY 2009-10 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 - Education Component Targeted Outcomes and Results

| Education FY 2009-10 Results | | | |
|---|---|-------------------|---|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| LEVEL 1a OUTCOMES (ADMINISTRATION MANAGEMENT PROGRAM ACTIVITIES) | | | |
| a) Modifications to JURMP | | | |
| Update applicable JURMP sections per Permit requirements | No updates made during the reporting period | Complete | Applicable updates were included in <i>JURMP Section 6.0</i> . No significant updates are expected to be necessary during this permit cycle. |
| b) Updates to Program Documentation (Policies, Plans, Procedures, and Forms) | | | |
| Update program documentation for consistency with program updates | Minor updates made to program | Complete | The City implements surveys when feasible at education events to establish a baseline level of knowledge. Minor program updates were made throughout the year to program content to more effectively present education materials. |
| c) Updates to Training Program | | | |
| Update training materials for consistency with <i>2008 JURMP Section 10.0</i> | Minor updates made to program including brochures | Complete | The City makes annual updates to training content and materials so that each education activity provides appropriate information for the target audience. For example the City developed a new construction site BMP brochure and made minor updates to the commercial business, car washing, pet waste, and residential brochures. The Environmental Division also made updates to the Municipal Facility and Activity BMP workbook that is kept in each City vehicle. |
| d) Year-End Program Review | | | |
| Complete annual year-end program review | Review program for effectiveness and efficiency | Complete | 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. |

Table 8.2 - Education Component Targeted Outcomes and Results

| Education FY 2009-10 Results | | | |
|--|--|-------------------|---|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| LEVEL 1b OUTCOMES (IMPLIMENTATION OF MANAGEMENT PROGRAM ACTIVITIES) | | | |
| a) Jurisdictional Requirements for Education Component | | | |
| Provide education to construction site owners and developers | Provided education to construction site owners and developers | Complete | Construction Site Owners, Contractors and Developers are trained through face-to-face meetings with the Community Development Department and the Publics Works Department during the permitting process. Community Development holds counter hours for project applicant. Education is reinforced through inspections and in investigations of illegal discharges. The City also developed a new construction BMP brochure. |
| Provide education for municipal staff | Provided annual training and additional education opportunities to municipal staff | Complete | The Environmental Division provided 15 municipal training activities including the annual storm water training for Public Works on 9/30/09. All new employees receive one-on-one training for storm water at the beginning of employment. City staffs are encouraged to attend training activities for storm water program outside the City. Face-to-face meetings are held on a regular basis with employees to discuss the JURMP and its application in their operations. Updates also made to the Municipal Facility and Activity BMP workbook that is kept inside every City vehicle. |
| Provide education to industrial and commercial owners and operators | Provided education to commercial businesses and owners | Complete | Commercial businesses receive education on storm water BMPs through a number of different methods including direct mail before scheduled inspections, face-to-face interaction with City staff during commercial inspections, through dissemination of education material, and through a follow up inspection letter that summarizes the results of the commercial inspection. The City also provides education to businesses during ICID investigations. |
| Provide education to underserved community | Provided education to underserved community | Complete | Education materials are provided in both English and Spanish. The environmental division also works with underserved youth at the Imperial Beach Job Corps through presentations and community projects. The City also Co-chairs the ERS Workgroup and Chairs the Underserved Target Audience Sub-Workgroup. |

Table 8.2 - Education Component Targeted Outcomes and Results

| Education FY 2009-10 Results | | | |
|---|--|-------------------|---|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| Provide education to residential community, general public, and school children | Provided education to residential community, general public, and school children | Complete | The Environmental Division provided 22 education activities targeted to residential community, general public, and school children. Some of the activities included presentation to schools, County splash lab, after school activities at IB Sports Park, media education, Recycling All-Star award, and City Council proclamation for Environmental Awareness Month in April. The Tijuana Estuary, State Park, FWS, YMCA Camp Surf, and Wildcoast also conduct environmental education and community outreach that is not currently tracked by the City but represents a significant effort to promote clean water. |
| Provide opportunity for public participation | Provided opportunities for public education | Complete | Public participation is encouraged in the development and implementation of the JURMP. The annual JURMP Report is presented at City Council during an open public hearing process. The Environmental Division also facilitates and participates in public cleanup activities that serve as mechanism for public participation in watershed activities. |
| b) Special Investigations | | | |
| Not targeted | Council Proclamation for the month of April as Environmental Awareness Month | Complete | Starting this reporting period the Imperial Beach proclaimed the month of April as "Environmental Awareness Month". Environmental Division scheduled a number of education activities for the month with the afterschool youth at IB Sports Park and selected a weekly recipient for the Recycling All-Star award for the month. These activities were in addition to the normal Earth Day celebrations in the region. |
| LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION) | | | |
| a) Construction Site Owners and Developers | | | |
| Assess knowledge and awareness for construction site owners and operators | Assessed knowledge whenever possible | Complete | Most construction activity in the City is from small discretionary projects and CIPs. Knowledge and awareness is achieved through proper submittal of storm water documents and proper implementation of BMPs. All projects are required to submit the necessary storm water documents and implement BMPs. Deficient projects receive proper education from staff. General outcomes reveal a high level of knowledge from larger contractors and a lesser understanding of BMPs from smaller general contractors. |

Table 8.2 - Education Component Targeted Outcomes and Results

| Education FY 2009-10 Results | | | |
|---|---|---|---|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| b) Municipal Departments and Personnel | | | |
| Assess knowledge and awareness for municipal staff | Assessed knowledge though surveys and regular meetings | Public Works survey score of 84% correct answers | Surveys are administered during annual storm water training events. The surveys are generally challenging in nature because personnel staff are expected to have a high level of understanding of storm water program. Surveys are administered at the beginning of the training session and used as a tool to highlight specific topics during the training session. |
| c) Industrial and Commercial Site Owners and Operators | | | |
| Assess knowledge and awareness for commercial businesses | Assessed through interactive assessment process | Assessment results provided in Table 5.5 in the Industrial Commercial Section | Starting this reporting period the Environmental Division incorporated an interactive effectiveness assessment of commercial businesses during the annual storm water inspection. The goal of the assessment is to get beyond BMP verification and assess the level of BMP effectiveness. |
| d) Underserved Community | | | |
| Assess knowledge and awareness for underserved community | Assessed though Regional Copermittee group | Complete | The Education and Residential Sources Workgroup provides targeted assessment of the underserved community through event surveys and a countywide phone survey. |
| e) Residential Community, General Public, and School Children | | | |
| Assess knowledge and awareness for residential community, general public, and school children | Assessed through surveys during presentations and at events | Complete | The City hired ILACSD to conduct targeted education and assessment for school children in elementary schools. The City also provided event surveys at the US Open Sandcastle Competition and Auto Show special events. Results indicated a change in knowledge from school presentations based on pre and post test scores. Event surveys also revealed a 69% understanding among the general public of the difference between storm water and sewer systems. |

Table 8.2 - Education Component Targeted Outcomes and Results

| Education FY 2009-10 Results | | | |
|--|---|--|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION FROM EDUCATION ACTIVITIES) | | | |
| a) Construction Site Owners and Developers | | | |
| Number of construction projects that were not in compliance with BMPs | 5 of 72 construction projects were out of compliance with BMPs | 93% of active construction projects in compliance with site BMPs | Most construction projects (93%) implemented the necessary BMPs to contain potential contaminants on site. Non-compliant projects received additional education and a follow up investigation to ensure the proper BMPs were implemented and maintained. |
| b) Municipal Departments and Personnel | | | |
| Number of ICIDs identified and reported by municipal staff | Municipal Staff identified 98 out of 153 ICID during the reporting period | Total ICID: 153 PW Env: 50 PW Other: 48 | One component of the annual municipal training is the proper identification of ICIDs. During FY 2009-10 64% of the identified ICIDs were reported by Public Works staff with the Environmental Division only making up 50 cases and the non-environmental Public Works staff making up 48 cases. |
| c) Industrial and Commercial Site Owners and Operators | | | |
| Number of commercial businesses not in compliance with minimum BMPs | 9 out of 71 commercial businesses were out of minimum BMP compliance | 87% of high priority businesses in compliance with minimum BMPs | The City inspects 100% of high priority commercial businesses annually for proper implementation of BMPs. During the reporting period the city inspected 71 commercial businesses with the result of 9 businesses out of compliance for minimum BMPs. Those 9 businesses were educated and then subsequently re-inspected at a later date and found to be in compliance with the minimum BMPs. |
| d) Underserved Community | | | |
| Not targeted | None | None | The underserved community is not specifically targeted by the city when assessing behaviors and BMP implementation because this task is more effectively addressed through the Regional Copermitttee group. |

Table 8.2 - Education Component Targeted Outcomes and Results

| Education FY 2009-10 Results | | | |
|--|---|-------------------|--|
| Targeted Outcome | Implementation Result | Assessment Result | Explanation |
| e) Residential Community, General Public, and School Children | | | |
| Number of education activities that target behavior change | 29 education activities during the reporting period | Complete | Assessing changes in behavior and BMP implementation across the whole community is best addressed through regional programs. Imperial Beach focuses on targeting education through a variety of media and interactive programs that target the most people possible. Anecdotal observations from City staff reveal a continuous improvement in BMP implementation across all targeted audiences as the persistent storm water education message gradually changes public behavior. |
| LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM EDUCATION ACTIVITIES) | | | |
| a) BMP Implementation | | | |
| Not targeted | None | None | Source load reductions are not easily tracked from education activities but can be implied through proper implementation of BMPs. Source load reductions from cleanup activities are tracked and reported separately. |

Table 8.3 - Education Activity Inventory by Targeted Community

| Education Activity | Date | Activity or Event Description | Topics | No. | Effectiveness Assessment | Comments |
|---|------------------|---|--|---------|--------------------------|------------------------|
| Municipal Departments and Personnel | | | | | | |
| FYI to City Staff and Council | Weekly | Provided updates on the storm water program and Environmental Division through a weekly email newsletter sent to City staff and Council | Storm Water program | 130 | No | 25 FYIs for the year |
| Code Enforcement Meeting | Monthly | Monthly meeting with Code Enforcement, Fire Inspector, Building Inspector, Community Development, and Environmental Division | Code enforcement issues many of which pertain to storm water | 8 | No | |
| Emergency Response Training | 8/21/2009 | Annual training of PW staff on emergency response including vector truck use, spill response, municipal BMPs | Stormwater training on spill response, municipal BMPs, and pollution prevention. | 24 | No | |
| LTEA Workshop for Environmental Division | 8/27/2009 | Copermittee workshop for combining the LTEA and Diamond rating systems | JURMP and WURMP effectiveness assessment | 1 | No | |
| Supervisor Meeting | 9/4/2009 | Environmental Manager updated PW Supervisors on SDGE vault dewatering | Vault dewatering, BMPs, illegal discharge response | 6 | No | |
| Public Works Annual Storm Water Training | 9/30/2009 | Annual training for PW staff on components of the JURMP and BMPs for municipal facilities and activities | Pollution prevention and response, BMPs for municipal facilities and activities | 22 | Yes | Survey |
| New Employee Storm Water Training | 9/28/2009 | Indoctrination for new Environmental Specialist employee Guy Nelson | Review the requirements of the MS4 Permit and tour | 1 | No | |
| CASQA Conference | 11/2-11/4/09 | Annual storm water conference | Storm water program development | 3 | No | |
| New Employee Storm Water Training | 11/23/2009 | Indoctrination for new PW Administrator Bobbie Ortero | Review the requirements of the MS4 Permit and tour | 1 | No | |
| SCCWRP Symposium | 1/20/2010 | Symposium | Presentation on yearly culmination of work by SCCWRP | 1 | No | |
| Construction General Permit Training | 2/25/2010 | Training on the new Construction General Permit | Overview of the new Construction General Permit | 2 | No | |
| SUSMP Workshop | 3/3/2010 | Workshop on new Countywide Model SUSMP | Overview of new SUSMP requirements and LIDs and BMPs | 4 | No | |
| New Employee Storm Water Training | 3/23/2010 | Indoctrination for new PW sewer division Maintenance Worker Eric Bennet | Review the requirements of the MS4 Permit and tour | 1 | No | |
| EPA Enforcement Workshop | 3/23/2010 | EPA enforcement workshop hosted by the commercial industrial workgroup | Enforcement strategies, standards, and methods | 1 | No | |
| SWAMP Webinar | 6/3/2010 | Online Webinar training | Overview of SWAMP program and projects in SD | 1 | No | |
| Construction Site Owners and Developers | | | | | | |
| Grading and Building permits with BMP Construction brochure | On going | Community Development Department disseminates BMP and storm water information with permits | BMP, pollution prevention, City storm water requirements | --- | No | |
| 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 | --- | No | |
| Commercial Owners and Operators | | | | | | |
| Sand Castle vender packed and inspections | 7/17th-19th/2009 | Provided education materials for street vendors and conducted commercial inspections during event | Mobile business, pollution prevention recycling | --- | No | |
| Commercial Inspection | On going | Commercial business inspections | Pollution prevention, BMPs, storm water regulations | 71 | Yes | Interactive Assessment |
| 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 | 9 | No | |
| Residents and General Public | | | | | | |
| FY 2008-09 JURMP Public Hearing | 8/2/2009 | Public hearing at City Council meeting | Overview of the FY 2008-09 JURMP AR components | --- | No | |
| Annual Home Front Cleanup | 5/1/2010 | EDCO bulky item collection at Mar Vista HS | Trash, recycling and waste | 822 | No | 175.6 tons |
| Booth at U.S. Open Sand Castle competition | 7/18th-19th/2009 | City booth for storm water and pollution prevention; Conducted survey | Pollution prevention, HHW, recycling, and storm water | 300,000 | Yes | Survey |
| Booth at Auto Show | 8/1/2009 | City booth for storm water and pollution prevention; Conducted survey | Pollution prevention, HHW, recycling | 1,000 | Yes | Survey |
| City Semi-Annual news letter (Winter) | 12/1/2009 | 5 Articles in City' winter news letter sent to all residents | Storm water BMPs; Recycling HHW; FOG, street sweeping | 27,000 | No | |

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| | | | | | | |
|--|-------------|--|---|-------------|-----|---|
| EDCO Environmental Times | Quarterly | Published a variety of environmental articles in the Summer, Fall, Winter, and Spring EDCO news letters sent to all residents | Pollution prevention, special events, HHW, recycling, and storm water regulations | 27,000 | Na | |
| Eagle and Times newspaper | On going | Articles on variety of topics advising the community on storm water related issues | Storm water pollution, reusable bag day, City | City wide | No | |
| San Diego Union Tribune | 8/29/2009 | Request for public comment on JURMP | Public comment on JURMP | Region | No | |
| Ewaste and Universal Waste Event | 10/24/09 | Collection of e-waste and universal waste at Civic Center parking lot. Post card advertisement sent to all residents | HHW and recycling information provided during Citywide event | 150 | No | |
| Ewaste and Universal Waste Event | 2/20/2010 | Collection of e-waste and universal waste at the Chula Vista old PW Yard. Partnered with Chula Vista. Post card advertisement. | HHW and recycling information provided during Citywide event | --- | No | |
| Community Bulletin Board (Channel 24-Cox) | On going | The Community Bulletin Board broadcasts seven-days a week | Storm water pollution, special events, general info | City wide | No | |
| Fix a Leak Week | 3/1/2010 | Public outreach with Cal Am Water company to raise awareness about water leaks | Water conservation and storm water pollution | Region wide | No | |
| Environmental Awareness Month | 4/1/2010 | City Council dedicated the month of April as Environmental Awareness Month | Promote public awareness on environmental issues | City wide | No | |
| Website | On going | Information about storm water program, recycling, and online reporting | Pollution prevention, storm water BMPs, Recycling | --- | No | |
| Recycling All-Star | Monthly | Award a Recycling All-Star from the community at City Council meeting | Recycling and waste management | 12 | No | |
| Underserved Community | | | | | | |
| Underserved Target Audience Sub workgroup | On going | Co-chair of Education Residential Sources Workgroup, Chair of Underserved Target Audience sub-workgroup | Representation of the underserved community in all ERS sub-workgroups | --- | No | |
| Presentation to Job Corps | 10/20/09 | Storm water presentation to Job Corps (Federal education program for 16-25 yrs to earn GED and job training) | Watershed and basics on storm water pollution. | 30 | No | |
| School Children | | | | | | |
| Mar Vista HS Presentation | 2/10/2010 | ILACSD gave 2 presentation for 10th-12th graders at Mar Vista HS | Storm Water, watersheds, urban runoff | 50 | Yes | Pre and Post |
| Mar Vista HS Presentation | 2/24/2010 | ILACSD gave 4 presentation for 9th-12th graders at Mar Vista HS | Storm Water, watersheds, urban runoff | 65 | Yes | Pre and Post |
| Mar Vista HS Presentation | 3/10/2010 | ILACSD gave 1 presentation for 9th-12th graders at Mar Vista HS | Storm Water, watersheds, urban runoff | 25 | Yes | Pre and Post |
| Splash Lab at IB Sports Park | 4/21/2010 | County Splash education lab | Storm Water, watersheds, urban runoff | 45 | No | |
| TJ Estuary Education Staff at IB Sports Park | 4/27-28/10 | Geocaching with GPS with TJ Estuary Education Staff | Watersheds, storm water pollution | 65 | No | |
| Imperial Beach Elementary | 5/27/10 | Watershed model presentation to 3rd and 5th graders | Watersheds, storm water pollution for 3 rd and 5 th grade | 135 | No | |
| Public Participation | | | | | | |
| Coastal Clean Up Day | 9/19/2009 | ILACSD and Coastkeeper Coastal Cleanup Day. Multiple sites in IB | Watershed awareness and public participation | Region wide | Yes | Per and Post tests |
| Make a Difference Day (Job Corps Volunteers) | 10/20-22/09 | Unimproved alley sweep for trash and debris. Bike path and South Seacoast trash collection | Appreciation of clean streets and clean environment | 30 | Yes | 185 trash bags, 15 truck loads and 6 tons |
| Tijuana River Valley Clean up (Wildcoast) | 10/24/09 | Clean up of tires and trash off Dairy Mart road bridge. Provided supplies and support | Bi-national watershed stewardship | 300 | Yes | 700 tires and 5 tons of trash |
| Community Service Training (Job Corps) | 11/15/09 | Indoctrination for Job Corps for community service projects that improve water quality | Pollution preventions and watershed awareness | 1 | No | |
| Job Corps Bike Path Clean up (Braxton Ford) | 2/10/10 | Worked with Job Corps student to organize a community clean up event | Watershed awareness and pollution prevention | 20 | Yes | 200 lbs of trash |
| Creek to Bay Clean Up | 4/24/2010 | ILACSD sponsorship for annual Creek to Bay Clean up. Participated at two cleanup locations | Pollution prevention and storm water | --- | No | |
| Citywide Garage Sale | 4/24/2010 | Citywide garage sale | Reuse | 96 | No | |
| Wildcoast Tijuana River Valley Clean Up | 6/5/2010 | Wildcoast Clean up event in TJ River | Bi-national watershed stewardship | 60 | Yes | 1000 lbs trash and 100 tires |

9.0 Public Participation

9.1 Introduction

The City is required to incorporate a mechanism for Public Participation in the updating, development, and implementation of the JURMP. Public involvement in the JURMP leads to a greater understanding of public perception and attitudes towards the problem of storm water pollution and helps the City implement a more effective storm water program. The Environmental Division 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 by providing opportunities throughout the year to provide comments and feedback.

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* newspaper 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 22, 2010.

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, and City special events.

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. The revenue source used by the City to fund the requirements of the Municipal Permit is the City general fund.

10.2 General Budget Information

The costs of implementing the JURMP are spread across the whole City. Each Department and associated Divisions 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 Copermittees 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.

10.4 Fiscal Analysis Results

10.4.1 Expenditures

The expenditures for FY 2009-10 are provided in the tables below. The standardized fiscal analysis method does not exactly correspond to the line item budget maintained by the City. The values presented in Table 10.1 are therefore an extrapolation of the expenditures made that correspond to the itemized categories. Table 10.2 is also provided for the expenditures related to the two Prop 50 Clean Beach Initiative grants during the reporting period.

The implementation of all the JURMP Components involves every City Department and Division and the actual implementation costs for the program may exceed the amount posted below.

Table 10.1 - Expenditures on JURMP for FY 2009-10

| | |
|----------------------------|------------------|
| Administration | \$236,427 |
| Development Planning | \$79,900 |
| Construction | --- |
| Municipal | \$292,580 |
| Industrial Commercial | \$8,725 |
| Residential | --- |
| IDDE | \$49,921 |
| Education | \$9,415 |
| Public Participation | --- |
| Special Investigations | \$13,270 |
| Non-Emergency Firefighting | \$102,385 |
| Regional Costs | \$42,413 |
| Total | \$835,036 |

Table 10.2 - Clean Beach Initiative Grant Projects and Expenditures FY 2009-10

| | |
|------------------------------|----------|
| Palm Ave Low Flow Diverter | \$50,867 |
| Tijuana River Bacteria Study | \$13,498 |

10.4.2 Funding Source

The general fund provides the only revenue source used by the City to fund the requirements of the Municipal Stormwater Permit. The City also relies on grant funding for additional studies or infrastructure projects that are above and beyond the requirements of the Permit. Other revenue sources such as building permit fees and redevelopment agency funds contribute to infrastructure projects that are indirectly related to the storm water program, but these expenditures are not enumerated above.

11.0 Program Effectiveness Assessment

11.1 Introduction

The Environmental Program Division is responsible for the effectiveness assessment of JURMP activities and implementation of BMPs for each major component of the storm water program. Effectiveness assessments are incorporated into the storm water program when ever feasible is to 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*. Each section of this Annual Report incorporates program effectiveness on Outcome Level 1 through Outcome Level 4. In general, Outcome Levels 1, 2, and 3 are best addressed on a Jurisdictional scale. Outcome Level 4 measurements of load reductions are provided whenever possible, 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.

11.2 Outcome Level 1a: Administration of Management Program Activities

The administration of management program activities addresses modifications to the *2008 JURMP*, updates to program documentation or procedures, end of the year program review, and updates to inventories for next fiscal year.

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

11.3 Outcome Level 1b: Implementation of Management Program Activities

The implementation of management program activities addresses BMP confirmation requirements, proper documentation, training, inspections, public awareness and response, and special investigations for each component of the *2008 JURMP*. The tables in each section of the Annual Report present and describe targeted outcomes and results based on program implementation for the reporting period.

11.4 Outcome Level 2: Knowledge and Awareness of Program Implementation

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

11.5 Outcome Level 3: Behaviors and Best Management Practice (BMP)

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

11.6 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. 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, and 2010 Storm Drain Master Plan.

12.2 Palm Avenue Low Flow Urban Runoff Diverter Project

The Palm Avenue Low Flow Urban Runoff Diverter became operational in the beginning of 2009. The diverter project, which was mostly funded under a Prop 50 CBI Grant, diverts up to 250 gallons per minute of nuisance flow urban runoff and first-flush rain water into the sanitary sewer. As part of the conditions on the Grant, the City conducted weekly post construction water quality monitoring for a one year period from January 2009 through December 2009. The final monitoring report for the project was submitted to the State Water Resource Control Board in February 2010.

The following bullet points summaries the effectiveness and benefits from the project:

- Bacterial data collected during the monitoring phase shows that, in the absence of the Palm Avenue Diverter, low-flow urban runoff and first-flush stormwater with high levels of bacteria would have been discharged to the receiving waters.
- Comparison of the concentration of bacteria in the wet well with the AB411 water quality benchmarks indicates that for total coliform 98% of the samples exceeded benchmarks, and for *Enterococcus* 91% of the readings exceeded the benchmarks.
- Data analysis shows that 100% of the samples collected at the diverter wet well exceeded at least one of the bacterial indicator benchmarks.
- The Palm Avenue Diverter directs an average of 23,000 gallons per month of urban runoff to the sanitary sewer.
- Only the Carnation Avenue receiving water sampling station had exceedances of bacterial indicators during the project's monitoring period. On February 17 and 18, 2009, during a storm event greater than 1/10th of an inch, when the diverter operated in storm discharge mode, water quality exceeded AB411 benchmarks. During the same period, the southern-most sampling location at Seacoast Drive also provides evidence of high bacteria levels likely originating from other sources including the Tijuana River Valley and Mexico.
- This project was successful in combining access to recreation, aesthetic improvements, public infrastructure, and water quality benefits. It received the "Project of the Year" award from the San Diego & Imperial Counties Section of the American Public Works Association (APWA).

12.3 Tijuana River Bacteria Source Identification Study

During last reporting period State funding was pulled from the Tijuana River Bacteria Source Identification Study. The City was forced to halt a grant project to identify and quantify the sources of bacterial contamination along the U.S. portion of the Tijuana River Watershed. The purpose of the study is to contribute to the regional efforts to identify 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.

The Bacteria Study was stalled for 15 months until March 2010 when the City received notification from the State that funding was available to restart the project. The project is now in full implementation and is on track to finish by March 2012.

12.4 2010 Storm Drain Master Plan

During the reporting period the City took on the task of updating its Storm Drain Master Plan. The purpose of the 2010 Storm Drain Study is to update the previous drainage study for Imperial Beach conducted in 1991 by BDS Engineering (*Bement-Dainwood-Sturgeon, August 1991*). The results from the Study provide the preliminary analysis in the Storm Drain Master Planning process that will lead to the identification and prioritization of capital improvement projects that increase the capacity of the storm drain system. The project is on track to be complete September 2010. The scope of work for the Study includes the following tasks:

- Review of Existing Data
- GIS Mapping and Field Verification
- Hydraulic and Hydrologic Modeling
- Identification of System Deficiencies

This Storm Drain Study is intended to be used as a planning tool for evaluating impacts to the storm drain system whether it is from new developments, capital improvement projects, or collection system improvements. The report provides hydraulic and hydrologic analysis for 7 large drainage areas and 15 smaller drainage areas in the City for the 2-year, 5-year, and 10-year storm flow conditions. This report identifies the existing capacity for each drainage area and provides preliminary recommendations on how to increase the capacity for the system.

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 2009-10. 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 2010-11 and beyond, the City is committed to continuing with many of the programs and management activities implemented in this report. 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.