



# **Jurisdictional Urban Runoff Management Program Annual Report FY2007-08 for the City of Imperial Beach**



Submitted by the  
City of Imperial Beach  
Department of Public Works  
495 10<sup>th</sup> Street  
Imperial Beach, California 91932  
September 30, 2008

## **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, 2007 and June 30, 2008 (FY2007-08).

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 Component**

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

Conditioned 48 discretionary permit applications requiring developers to maximize infiltration, minimize impervious surfaces, install treatment devices, etc. This compares to 51 projects during FY2006-07.

Approved Storm Water Management Plans (SWMPs) for three (3) priority development projects subject to the Standard Urban Storm Water Mitigation Plan (SUSMP).

Discussed urban runoff management requirements with all permit applicants at project intake.

### **Construction Component**

The Municipal Storm Water Permit requires the City to oversee compliance with construction-phase BMPs at all construction projects in the City. Major accomplishments during FY2007-08 included:

Inspected 48 active discretionary permit projects for proper deployment of construction-phase BMPs. Approximately 117 inspections were performed.

Performed oversight of construction BMP compliance at all eight (8) capital improvement projects (CIPs) that were in active construction phase.

No notices of violation or abatement to construction developers and contractors as part of the oversight and enforcement process. All projects were able to comply with verbal warnings.

Discussed urban runoff management requirements with all applicants at project intake, and emphasized requirements again during follow-up inspections.

### **Municipal Component**

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

Examples of BMPs implemented at municipal facilities included:

Vehicle washing in wash bays that drain to the sanitary sewer.

Preventive maintenance of City vehicles to prevent fluid leakage.

Use of high-power vacuums to capture runoff from power washing activities (i.e., during graffiti abatement and spill cleanup).

Hand weeding of street medians instead of herbicide application. Strict limitations on use of fertilizers and pesticides.

Monitoring of sprinkler systems to prevent over-topping onto roadways.

Completed the 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 at work sites.

Other notable accomplishments during FY2007-08 were:

Removed an estimated 3 tons of material through storm drain cleaning.

Removed an estimated 150 tons of material through frequent street sweeping.

Continued maintenance of below-ground storm water treatment devices, which trap debris before it reaches receiving waters (10th Street storm water interceptor; 12 storm drain inlet filters).

Continued operation of the Date Avenue urban runoff diversion system, which diverts nuisance runoff to the sanitary sewer during low-flow conditions. Began installation of the Palm Avenue

urban runoff diversion system at Seacoast Avenue. Completion is scheduled for December 2008.

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 was made on this front during this fiscal year:

Conducted 27 inspections most of which were high priority businesses, including automotive repair shops, restaurants, bars, gas stations, car washes, etc. Performed an additional 136 investigations of commercial businesses as a result of complaint referrals or staff observations in the field. This was up from 46 during FY2006-07.

Issued 21 enforcement actions to businesses as part of the enforcement and case resolution process. Other deficiencies were resolved with verbal warnings.

### **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 46 residential violations. This compares to 18, 13, 42 and 50 in the previous four years, respectively. The most commonly observed violations involved construction debris, automotive fluids, washwater, detergents or chemicals, chlorinated swimming pool water and green waste.

Issued 14 notices of violation and 7 notices of abatement as part of the enforcement and case resolution process. Other deficiencies were resolved with verbal warnings and/or letters. No fines were issued to residents during this reporting period.

Distributed educational brochures to residents throughout the year. Brochures target the following high priority activities: 1) pollution prevention around the home, 2) disposal of pet waste, 3) car washing, 4) proper disposal of motor oil, and 5) lawn and garden care.

Educated residents on environmental issues including stormwater in the City's semi-annual newsletters and a quarterly newsletter distributed by EDCO. Organized and held an Earth Day at the Pier which was attended by approximately 300 school children from two school districts, and 20 other agencies and organizations, along with many members of the general public.

Approximately 3 tons of household hazardous waste was properly disposed of at the South Bay Household Hazardous Waste facility in Chula Vista.

Imperial Beach residents recycled approximately 21,100 gallons of used oil at Kragen Auto Parts and Jiffy Lube, and through EDCO's pick-up service. This is a significant increase from the previous reporting period in which 2,440 gallons of used oil were recycled.

### **Illicit Discharge Detection and Elimination Component**

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. 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. The following were major accomplishments during the 2007 and 2008 calendar years.

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 30<sup>th</sup> to December 15<sup>th</sup>. This change was necessary because the program involves water quality monitoring during the dry season, defined as May 1<sup>st</sup> through September 30<sup>th</sup>, which does not allow for proper time in which to report and convey information on the dry season as a whole.

Notable accomplishments during FY2007-08 were:

City staff participated in the cleanup of 23 illicit discharges. Cost recovery was pursued in 3 of these cases, recouping approximately \$1,000 in costs.

Responded to 6 sewage spills during this reporting period, all of which were from private laterals.

## CERTIFICATION STATEMENT

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

Authorized Signatory(s)

Title

Phone No.

Date

Public Works Director

(619) 628-1369

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H. A. Levien

## Table of Contents

	Page
Executive Summary	
Signed Certification Statement	
1.0 Introduction.....	1
2.0 Development Planning Component.....	2
3.0 Construction Component.....	15
4.0 Municipal Component.....	28
5.0 Industrial and Commercial Component.....	42
6.0 Residential Component.....	51
7.0 Illicit Discharge Detection and Elimination Component.....	60
8.0 Education Component.....	61
9.0 Public Participation.....	70
10.0 Program Effectiveness Assessment.....	71
11.0 Fiscal Analysis Component.....	72

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## **1.0 INTRODUCTION**

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

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

## **2.0 DEVELOPMENT PLANNING COMPONENT**

### **2.1 Introduction**

The City endeavors to reduce the impacts of new development and redevelopment on water quality. 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.

### **2.2 Level 1 Outcomes – Management Program Activities**

#### **2.2.1 Program Planning and Administration**

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

The City's implementation and assessment strategy for the Development Planning component is described in the *JURMP Section 4.0*. Figure 2.1 provides an overview of the major elements of this strategy as it was implemented during FY 2007-08.

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

#### **2.2.2 Management Program Implementation**

The Management Program Implementation element of the Annual Report addresses requirements, training, inspections, public awareness and response, and surveys and special investigations. Table 2.2 presents and describes targeted FY 2007-08 outcomes and results, as well as implementation targets for FY 2008-09. Additional documentation, analysis, and discussion is provided in Table 2.3.

### **2.3 Outcomes Targeted for Staff Implementing Control Measures**

#### **2.3.1 Outcome Level 2 – Knowledge and Awareness**

Education is provided to the public through face-to-face interaction with City staff in meetings and at inspections, and several local ordinances and brochures that outline the requirements for addressing urban runoff and water quality. These efforts by the City to educate the public on development planning are discussed in the *JURMP Section 4.0*. The education effort for City staff is discussed in the *JURMP Section 10.0*.

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

The *JURMP Appendix C* defines minimum BMP requirements applicable to development and redevelopment in the City. BMPs applicable to the Development Planning Component were updated as part of the City's JURMP revision, submitted on March 24, 2008. FY 2007-08 changes included in that update are described in Table 2.2. BMP requirements were reviewed for necessary updates or modifications subsequent to the completion of FY 2007-08; additional modifications to the BMP requirements of this element were not determined to be necessary as a result of this review.

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. The ordinances include appropriate sanctions to achieve compliance including non-monetary penalties, fines, bonding requirements, and/or permit or occupancy denials for non-compliance.

**2.3.3 Outcome Level 4 – Source Load Reductions**

The City imposed one or more conditions of approval on 48 discretionary project applications during FY 2007-08. This includes three new "priority development projects" that will be subject to the City's SUSMP ordinance.

Level 1 Outcomes (Management Program Activities)		Outcomes Targeted for Staff Implementing Control Measures		
		Outcome Level 2	Outcome Level 3	Outcome Level 4
<b>1.A. Program Planning and Administration</b>	<b>1.B. Management Program Implementation</b>	<b>Knowledge and Awareness</b>	<b>Behaviors and BMP Implementation</b>	<b>Source Load Reductions from Development Projects</b>
<p><b>1. FY 2007-08 Program Updates</b></p> <ul style="list-style-type: none"> <li>▪ Modifications to JURMP</li> <li>▪ Updates to program documentation</li> <li>▪ Updates to training content &amp; materials</li> </ul> <p><b>2. FY 2008-09 Program Review and Update</b></p> <ul style="list-style-type: none"> <li>▪ Year-end program review</li> <li>▪ Updated database and inventory of treatment control BMPs</li> </ul>	<p><b>1. Jurisdictional Requirements for Project Approval</b></p> <p><b>2. Municipal Staff Training</b></p> <ul style="list-style-type: none"> <li>▪ Program Administration Staff</li> <li>▪ Program Implementation Staff</li> </ul> <p><b>3. Developer Education</b></p> <p><b>4. Development Inspections</b></p> <p><b>5. Surveys and Special Investigations</b></p> <p><i>Not targeted or assessed</i></p>	<p><b>A. Project Development Responsibilities</b></p> <p><i>Not targeted or assessed</i></p> <p><b>B. Core Concepts</b></p> <p><i>Not targeted or assessed</i></p> <p><b>C. Implementation Responsibilities</b></p> <p><i>Not targeted or assessed</i></p>	<p><b>A. Development Activities</b></p> <ul style="list-style-type: none"> <li>▪ Procedural and Administrative Behaviors</li> <li>▪ BMP implementation</li> <li>▪ Illicit discharge control</li> </ul> <p><b>B. Public Service Requests</b></p> <ul style="list-style-type: none"> <li>▪ Response to requests</li> </ul>	<p><b>A. Treatment control BMPs</b></p> <p><b>B. Runoff diversion to pervious surfaces and relocation of site features to drain to landscaped areas</b></p> <p><b>C. Low Impact Development (LID) BMPs</b></p> <p><b>D. Site Design BMPs</b></p>

Figure 2.1 – FY 2007-08 Implementation and Assessment Strategy for the Development Planning Component

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

Category	Number	Description
<b>A. Type of Development</b>		
New development	12	All development projects are required to undergo the City's urban runoff approval process and meet applicable requirements.
Redevelopment	39	
<b>B. Priority Classification</b>		
Discretionary Projects	48	No projects received a SUSMP waiver.
Priority Development (SUSMP) Projects	3	
<b>C. Totals</b>		
Discretionary Projects	48	
Priority Development (SUSMP) Projects	3	
JURMP Sections	Description of FY 2007-08 Changes	
4.0 and Appendix C	BMP requirements of the JURMP applicable to development planning were modified in accordance with the requirements of the updated Permit in March 2008.	

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

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>LEVEL 1 OUTCOMES (MANAGEMENT PROGRAM ACTIVITIES)</b>				
<b>A. PROGRAM PLANNING AND ADMINISTRATION</b>				
<b>1. FY 2007-08 PROGRAM UPDATES</b>				
<b>A) MODIFICATIONS TO JURMP</b>				
Update applicable JURMP sections per new Permit requirements	Applicable JURMP sections updated 03-24-08	Completion	Applicable updates were included in <b>JURMP Section 4.0</b> , submitted to the RWQCB on 03-24-08.	Complete and identify FY 2008-09 JURMP modifications
<b>B) UPDATES TO PROGRAM DOCUMENTATION (POLICIES, PLANS, PROCEDURES, GUIDELINES, AND FORMS)</b>				
---	---	---	No program policies, plans, procedures, guidelines, or forms have yet been developed. The City previously modified its General Plan and updated forms associated with its environmental review process.	Update program documentation for consistency with program updates
<b>C) UPDATES TO TRAINING PROGRAM</b>				
---	---	---	<b>JURMP Section 10.0</b> establishes updated standards for training municipal staff. Since these standards will take effect during FY 2008-09, training content and materials will be updated accordingly.	Update staff training materials for consistency with updated standards of JURMP Section 10.0

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

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>2. FY 2008-09 PROGRAM REVIEW AND UPDATE</b>				
<b>A) YEAR-END PROGRAM REVIEW</b>				
Complete annual year-end program review	Review underway	In progress	An annual program review for this element is underway during the development of this JURMP Annual Report. JURMP modifications recommended or planned as a result of this review are presented herein.	Complete annual year-end program review
<b>B) DEVELOP INVENTORY FOR DEVELOPMENT AND REDEVELOPMENT PROJECTS</b>				
Develop inventory of development and redevelopment projects	Inventory developed	Completion	The City developed an inventory of development projects in progress in FY 2007-08.	Update development and redevelopment inventory
<b>C) DEVELOP DATABASE AND INVENTORY FOR APPROVED TREATMENT CONTROL BMPS AND MAINTENANCE</b>				
Develop watershed-based database and inventory of approved treatment control BMPS and maintenance activities	Database and inventory developed	Completion	The City was required to develop an inventory of development projects subsequent to the completion of FY 2007-08.	Update database and inventory
<b>B. MANAGEMENT PROGRAM IMPLEMENTATION</b>				
<b>1. Jurisdictional Requirements for Project Approval</b>				
Require projects to implement BMPS	Requirements implemented	Completion	All development and redevelopment projects are required to implement measures to reduce pollutants and runoff to the MEP.	Condition projects with appropriate

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

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
				BMPs prior to permit approval
<b>2. Municipal Staff Training</b>				
Provide training for FY 2007-08	Training provided	Completion	Continuing with FY 2008-09, training results for staff with responsibilities applicable to this element will be included as part of this annual report section.	Provide training to all staff with identified responsibilities
<b>3. Developer Education</b>				
Conduct education through meetings, workshops, brochure dissemination	Counter hours held and meetings conducted throughout reporting period	Confirmation	The Community Development Department held counter hours and face-to-face meetings throughout FY 2007-08 to provide the developers education.	Operate counter hours, meetings, and workshops to provide developers education
<b>4. Development Inspections</b>				
Inspect development activities	117 inspections conducted	Completion	All development and redevelopment projects are formally inspected for applicable BMPs throughout the duration of each project.	Inspect development projects
<b>5. Surveys and Special Investigations</b>				
Not targeted or assessed	---	---	Special investigations were not conducted in FY 2007-08, and are not routinely conducted as part of the implementation strategy for this program element.	Survey developers to ascertain baseline levels of knowledge concerning development BMPs
Not targeted or assessed	---	---	Surveys of staff knowledge were not conducted during FY 2007-08. Beginning in FY 2008-09, surveys will routinely be incorporated	Survey staff to ascertain baseline

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

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
			before and after training as a means of evaluating training success and of monitoring staff knowledge from year to year.	levels of knowledge concerning basic principles and specific job responsibilities.
<b>LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY STAFF AND CONTRACTORS)</b>				
Not targeted or assessed	---	---	Starting in FY 2008-09, the City will begin incorporating testing before and after development planning staff training to evaluate the training success and to determine whether changes in knowledge are being retained over time. Anticipated content includes BMP knowledge, core concepts of development, and specific job responsibilities.	Establish a baseline of staff knowledge regarding applicable program content
<b>LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY STAFF AND DEVELOPERS)</b>				
<b>A. DEVELOPMENT ACTIVITIES</b>				
<b>1. Procedural and Administrative Behaviors</b>				
<b>July 1, 2007 through June 30, 2008</b>				
Review projects and prescribe necessary conditions of approval	51 projects conditioned	Completion	The City reviews and conditions all proposed projects to ensure compliance with program.	Review projects prior to approval and issuance of permits
Inspect projects for compliance	51 projects inspected	Completion	The City inspects all projects for violations.	Inspect projects
Enforce	0 with enforcement	Completion	The City enforces compliance at all project sites.	Enforce compliance

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

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
compliance and track violations	actions			and track violations
<b>2. BMP Implementation, Operation and Maintenance</b>				
<b>July 1, 2007 through June 30, 2008</b>				
Inspect projects and verify BMPs	51 projects in compliance	Completion	The City inspects and verifies BMPs at all proposed projects to ensure compliance with program.	Review projects for appropriate BMPs prior to approval and issuance of permits
Not targeted or assessed	---	---	The City annually verifies operation and maintenance of treatment control BMPs to ensure compliance with program.	Verify operation and maintenance of treatment control BMPs
<b>3. Illicit Discharge Control</b>				
<b>July 1, 2007 through June 30, 2008</b>				
Inspect development projects at least once during development	51 projects inspected	Completion	The City inspects projects and enforces stormwater ordinances at all development sites.	Inspect projects during development phase
<b>B. PUBLIC SERVICE REQUESTS</b>				
Respond to all development planning requests received	51 projects reviewed	Completion	The City tracks public service requests for development activities.	Respond to all development planning requests received

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

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM NEW DEVELOPMENT AND REDEVELOPMENT PROJECTS)</b>				
<b>A. TREATMENT CONTROL BMPS</b>				
Not targeted	3 projects required installation of treatment control BMPS	---	The City requires and tracks the installation and maintenance of source control BMPS as necessary. Load reductions are not tracked.	Not targeted
<b>B. RUNOFF DIVERSION AND RELOCATION OF SITE FEATURES TO DRAIN TO PERVIOUS SURFACES</b>				
Not targeted	47 projects required to divert or relocate site features	---	The City requires diversion or relocation BMPS. Load reductions are not tracked.	Not targeted
<b>C. LOW IMPACT DEVELOPMENT (LID) BMPS</b>				
Not targeted	3 projects required to implement LID BMPS	---	The City requires LID BMPS. Load reductions are not tracked.	Not targeted
<b>D. SITE DESIGN BMPS</b>				
Not targeted	46 projects required to implement site design BMPS	---	The City requires site design BMPS. Load reductions are not tracked.	Not targeted

**Table 2.3 – Treatment Control BMP Inventory**

ID	Filter Type	Address / Location		Watershed	Date of Installation	Responsible Party for Maintenance	Date of Service	Service Conducted			Volume/Weight of Debris Removed (lbs)	Materials Collected		
								Inspected	Cleaned	Boom(s) Replaced		Sediment	Trash	Organics
IBP1	KriStar, Flo Gard Plus Catch	Wally's IGA, 836 Palm Avenue	Wally's IGA parking lot	Otay	05/01/02	Drainage Protection Systems	09/29/07	X	X	X		X	X	X
							01/04/08	X	X	X				
IBP2	KriStar, Flo Gard Plus Catch	Wally's IGA, 836 Palm Avenue	Northwest corner of Wally's IGA parking lot	Otay	05/01/02	Drainage Protection Systems	09/29/07	X	X	X		X	X	X
							01/04/08	X	X	X				
IBP3	KriStar, Flo Gard Plus Catch	Wally's IGA, 836 Palm Avenue	Entrance to Wally's at 8th Street	Otay	05/01/02	Drainage Protection Systems	09/29/07	X	X	X		X	X	X
							01/04/08	X	X	X				
IBP4	KriStar, Flo Gard Plus Catch	Wally's IGA, 836 Palm Avenue	Loading area at Wally's IGA	Otay	05/01/02	Drainage Protection Systems	09/29/07	X	X	X		X	X	X
							01/04/08	X	X	X				
IBP5	KriStar, Flo Gard Plus Catch Basin Insert w/	CVS Pharmacy, 888 Palm Avenue	Southeast corner of back lot.	Otay	05/01/02	Drainage Protection Systems	09/29/07	X	X	X		X	X	X
							01/04/08	X	X	X				

**Table 2.3 – Treatment Control BMP Inventory**

ID	Filter Type	Address / Location		Watershed	Date of Installation	Responsible Party for Maintenance	Date of Service	Service Conducted			Volume/Weight of Debris Removed (lbs)	Materials Collected		
								Inspected	Cleaned	Boom(s) Replaced		Sediment	Trash	Organics
IBP 6	KriStar, Flo Gard Plus Catch Basin Insert w/	CVS Pharmacy, 888 Palm Avenue	Northeast corner of back lot	Otay	05/01/02	Drainage Protection Systems	09/29/07	X	X	X	Total (all)- 4cf	X	X	X
							01/04/08	X	X	X				
13 SM 1	Drop Inlet Catch Basin Insert w/ boom (Ocean Protection	13th Street Market, 1126 13th Street	Front entrance (north)	Tijuana	N/A	Bio Clean Environmental Services	02/08/08		X	X	15lbs	8	2	5
13 SM 2	Drop Inlet Catch Basin Insert w/ boom (Ocean Protection	13th Street Market, 1126 13th Street	Front entrance (south)	Tijuana	N/A	Bio Clean Environmental Services	02/08/08		X	X	15lbs	8	2	5
13 SM 3	Drop Inlet Catch Basin Insert w/ boom (Ocean Protection	13th Street Market, 1126 13th Street	Back parking lot (north)	Tijuana	N/A	Bio Clean Environmental Services	02/08/08		X	X	10lbs	4	1	5

**Table 2.3 – Treatment Control BMP Inventory**

ID	Filter Type	Address / Location		Watershed	Date of Installation	Responsible Party for Maintenance	Date of Service	Service Conducted			Volume/Weight of Debris Removed (lbs)	Materials Collected		
								Inspected	Cleaned	Boom(s) Replaced		Sediment	Trash	Organics
13S M4	Drop Inlet Catch Basin Insert w/ boom (Ocean	13th Street Market, 1126 13th Street	Back parking lot (south)	Tijuana	N/A	Bio Clean Environmental Services	8-Feb-08		X	X	10lbs	4	1	5
IRIS 1	Sump Pump and Screen	1450 Iris Avenue	Back parking lot	Tijuana	27-Jun-05	Tapestry Maintenance Association	Monthly							
11th ST1	KriStar, Flo Gard Plus Catch	861 11th Street	Driveway approach to condomin	Otay	N/A	Resident	1-Sep-07							
TLE 1	Grate Inlet Skimmer Box w/	Tunes, Lubes, Etc 741 Palm	Back Vehicle Storage Area	Otay	1-Jun-05	Tunes, Lubes, Etc.	28-Jan-08		X		.5 lbs	X		

### **3.0 CONSTRUCTION COMPONENT**

#### **3.1 Introduction**

The City endeavors to reduce the impacts of construction on water quality. This component is primarily applicable to the Community Development Department and requirements that apply to the Building and Planning Division activities related to construction and construction permits, and compliance actions proposed by the City. The Environmental Division of the Public Works Department assists in implementing stormwater requirements of the Municipal Permit.

#### **3.2 Level 1 Outcomes – Management Program Activities**

##### **3.2.1 Program Planning and Administration**

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

The City's implementation and assessment strategy for the Construction component is described in the *JURMP Section 5.0*. Figure 3.1 provides an overview of the major elements of this strategy as it was implemented during FY 2007-08.

##### **3.2.2 Management Program Implementation**

The Management Program Implementation element of the Annual Report addresses requirements, training, inspections, public awareness and response, and surveys and special investigations. Table 4.2 presents and describes targeted FY 2007-08 outcomes and results, as well as implementation targets for FY 2008-09. Additional documentation, analysis, and discussion is provided in Table 3.2.

#### **3.3 Outcomes Targeted for Staff Implementing Control Measures**

##### **3.3.1 Outcome Level 2 – Knowledge and Awareness**

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

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

The City requires all construction projects to submit a project stormwater management plan for approval and to obtain coverage if necessary under the State Water Resources Control Board's

General Construction Permit during FY 2007-08. The *JURMP Appendix D* defines minimum BMP requirements applicable to construction in the City. BMPs applicable to the Construction Component were updated as part of the City's JURMP revision, submitted on March 24, 2008. FY 2007-08 changes included in that update are described in Table 3.2. BMP requirements were reviewed for necessary updates or modifications subsequent to the completion of FY 2007-08; additional modifications to the BMP requirements of this element were not determined to be necessary as a result of this review.

### **3.3.3 Outcome Level 4 – Source Load Reductions**

A watershed-based inventory of all construction sites within the City is maintained and updated monthly.

Level 1 Outcomes (Management Program Activities)		Outcomes Targeted for Staff Implementing Control Measures		
1.A. Program Planning and Administration	1.B. Management Program Implementation	Outcome Level 2	Outcome Level 3	Outcome Level 4
<p><b>1. FY 2007-08 Program Updates</b></p> <ul style="list-style-type: none"> <li>▪ Modifications to JURMP</li> <li>▪ Updates to program documentation</li> <li>▪ Updates to training content &amp; materials</li> </ul> <p><b>2. FY 2008-09 Program Review and Update</b></p> <ul style="list-style-type: none"> <li>▪ Year-end program review</li> <li>▪ Updated watershed-based inventory of construction sites</li> </ul>	<p><b>1. Jurisdictional Requirements for Project Approval</b></p> <p><b>2. Municipal Staff Training</b></p> <ul style="list-style-type: none"> <li>▪ Program Administration Staff</li> <li>▪ Program Implementation Staff</li> </ul> <p><b>3. Contractor Education</b></p> <p><b>4. Construction Site Inspections</b></p> <p><b>5. Surveys and Special Investigations</b></p> <p><i>Not targeted or assessed</i></p>	<p><b>Knowledge and Awareness</b></p> <p><b>A. Construction Responsibilities</b></p> <p><i>Not targeted or assessed</i></p> <p><b>B. Core Concepts</b></p> <p><i>Not targeted or assessed</i></p> <p><b>C. Implementation Responsibilities</b></p> <p><i>Not targeted or assessed</i></p>	<p><b>Behaviors and BMP Implementation</b></p> <p><b>A. Construction Activities</b></p> <ul style="list-style-type: none"> <li>▪ Procedural and Administrative Behaviors</li> <li>▪ BMP implementation</li> <li>▪ Illicit discharge control</li> </ul> <p><b>B. Public Service Requests</b></p> <ul style="list-style-type: none"> <li>▪ Response to requests</li> </ul>	<p><b>Source Load Reductions from Construction Projects</b></p> <p><b>A. General site management requirements</b></p> <p><b>B. Erosion and sediment controls</b></p> <p><b>C. Advanced treatment for sediment</b></p> <p><b>D. Designated minimum BMPs</b></p> <p><b>E. Additional controls for CWA Section 303(d) waters</b></p>

Figure 3.1 – FY 2007-08 Implementation and Assessment Strategy for the Construction Component

**Table 3.1 – Overview of Construction Inventory by Priority Classification**

Category	Number	Description
<b>A. Type of Construction</b>		
Construction Projects	48	
Priority Development (SUSMP) Projects	3	
<b>B. Priority Classification</b>		
High Priority Projects	12	High priority projects in the City are the new construction projects plus SUSMP projects.
Medium Priority Projects	--	
Low Priority Projects	39	
<b>C. Totals</b>		
Construction Projects	48	
Priority Development (SUSMP) Projects	3	
<b>JURMP Sections</b>	<b>Description of FY 2007-08 Changes</b>	
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 – Targeted Outcomes and Results for the Construction Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>LEVEL 1 OUTCOMES (MANAGEMENT PROGRAM ACTIVITIES)</b>				
<b>A. PROGRAM PLANNING AND ADMINISTRATION</b>				
<b>1. FY 2007-08 PROGRAM UPDATES</b>				
<b>A) MODIFICATIONS TO JURMP</b>				
Update applicable JURMP sections per new Permit requirements	Applicable JURMP sections updated 03-24-08	Completion	Applicable updates were included in <b>JURMP Section 5.0</b> , submitted to the RWQCB on 03-24-08.	Complete and identify FY 2008-09 JURMP modifications
<b>B) UPDATES TO PROGRAM DOCUMENTATION (POLICIES, PLANS, PROCEDURES, GUIDELINES, AND FORMS)</b>				
---	---	---	No program policies, plans, procedures, guidelines, or forms have yet been developed. The City previously updated its grading ordinance and other applicable ordinances and forms associated with its environmental review process.	Update program documentation for consistency with program updates
<b>C) UPDATES TO TRAINING PROGRAM</b>				
---	---	---	<b>JURMP Section 10.0</b> establishes updated standards for training municipal staff. Since these standards will take effect during FY 2008-09, training content and materials will be updated accordingly.	Update staff training materials for consistency with updated standards of JURMP Section 10.0
<b>2. FY 2008-09 PROGRAM REVIEW AND UPDATE</b>				
<b>A) YEAR-END PROGRAM REVIEW</b>				
Complete annual	Review underway	In progress	An annual program review for this element is underway during the	Complete annual

**Table 3.2 – Targeted Outcomes and Results for the Construction Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
year-end program review			development of this JURMP Annual Report. JURMP modifications recommended or planned as a result of this review are presented herein.	year-end program review
<b>B) DEVELOP INVENTORY FOR CONSTRUCTION PROJECTS</b>				
Develop an inventory of construction projects	Inventory developed	Completion	The City was required to develop an inventory of construction sites subsequent to the completion of FY 2007-08. Additional information for each construction site is provided in Table 3.3.	Update construction project inventory
<b>B. MANAGEMENT PROGRAM IMPLEMENTATION</b>				
<b>1. Jurisdictional Requirements for Project Approval</b>				
Require projects to implement BMPs	Requirements implemented	Completion	All development and redevelopment projects are required to implement measures to reduce pollutants and runoff to the MEP.	Condition projects with appropriate BMPs prior to permit approval
<b>2. Municipal Staff Training</b>				
Provide training for FY 2007-08	Training provided	Completion	Continuing with FY 2008-09, training results for staff with responsibilities applicable to this element will be included as part of this annual report section.	Provide training to all staff with identified responsibilities
<b>3. Construction Contractor Education</b>				
Conduct education through meetings, workshops, brochure dissemination	Counter hours held and meetings conducted throughout reporting period	Confirmation	The Community Development Department held counter hours and meetings throughout FY 2007-08 to provide the contractors education.	Operate counter hours, meetings, and workshops to provide contractors education.

**Table 3.2 – Targeted Outcomes and Results for the Construction Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>4. Construction Inspections</b>				
Inspect construction activities	66 Inspections done throughout project duration	Completion	All construction projects are formally inspected throughout the duration of the project. During the rainy season, all high priority sites will be inspected at least biweekly, medium priority sites will be inspected at least monthly, and low priority sites will be inspected as needed. During the dry season, all construction sites will be inspected as needed. Confirm maximum disturbed area for grading applied if applicable.	Inspect construction sites based on priority of site.
<b>5. Surveys and Special Investigations</b>				
Not targeted or assessed	---	---	Special investigations were not conducted in FY 2007-08, and are not routinely conducted as part of the implementation strategy for this program element.	Not targeted
Not targeted or assessed	---	---	Surveys of staff knowledge were not conducted during FY 2007-08. Beginning in FY 2008-09, surveys will routinely be incorporated before and after training as a means of evaluating training success and of monitoring staff knowledge from year to year.	Survey staff to ascertain baseline levels of knowledge concerning basic principles and specific job responsibilities.
<b>LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY STAFF AND CONTRACTORS)</b>				
Not targeted or assessed	---	---	Starting in FY 2008-09, the City will begin incorporating testing before and after development planning staff training to evaluate the training success and to determine whether changes in knowledge are being retained over time. Anticipated content includes BMP knowledge, core concepts of development, and specific job responsibilities.	Establish a baseline of staff knowledge regarding applicable program content

**Table 3.2 – Targeted Outcomes and Results for the Construction Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY STAFF AND CONTRACTORS)</b>				
<b>A. CONSTRUCTION ACTIVITIES</b>				
<b>1. Procedural and Administrative Behaviors</b>				
<b>July 1, 2007 through June 30, 2008</b>				
Review projects and prescribe necessary conditions of approval	51 projects conditioned	Completion	The City reviews and conditions all proposed projects to ensure compliance with program.	Review projects prior to approval and issuance of permits
<b>2. BMP Implementation</b>				
<b>July 1, 2007 through June 30, 2008</b>				
Review projects and require BMPs	51 projects approved	Completion	The City reviews and requires all proposed projects to comply with program.	Review projects for appropriate BMPs prior to approval and issuance of permits
Inspect projects and verify BMPs	51 projects inspected	Completion	The City inspects and verifies BMPs at all projects to ensure compliance with program.	Review projects for appropriate BMPs prior to approval and issuance of permits

**Table 3.2 – Targeted Outcomes and Results for the Construction Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>3. Illicit Discharge Control</b>				
<b>July 1, 2007 through June 30, 2008</b>				
Inspect development projects at least once during development	51 projects inspected	Completion	The City inspects projects and enforces stormwater ordinances at all construction sites.	Inspect projects during construction phase
<b>B. PUBLIC SERVICE REQUESTS</b>				
Respond to all construction requests received	51 projects reviewed	Completion	The City tracks public service requests for construction activities.	Respond to all construction requests received
<b>LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM CONSTRUCTION PROJECTS)</b>				
<b>A. GENERAL SITE MANAGEMENT REQUIREMENTS</b>				
Not targeted	51 projects required to reduce discharges	---	The City requires construction sites to reduce construction site discharges of pollutants to the MEP, and to prevent discharges from causing or contributing to a violation of water quality standards.	Not targeted
<b>B. EROSION AND SEDIMENT CONTROLS</b>				
Not targeted	12 projects required installation of erosion and sediment control BMPs	---	The City requires installation of erosion and sediment control BMPs. Load reductions are not tracked.	Not targeted
<b>C. ADVANCED TREATMENT FOR SEDIMENT</b>				
Not targeted	12 projects required	---	The City requires advanced treatment controls for sediment. Load	Not targeted

**Table 3.2 – Targeted Outcomes and Results for the Construction Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
	to apply advanced treatment controls for sediment		reductions are not tracked.	
<b>D. DESIGNATED MINIMUM BMPS</b>				
Not targeted	51 projects required to implement designated minimum BMPs	---	The City requires designated minimum BMPs. Load reductions are not tracked.	Not targeted
<b>E. ADDITIONAL CONTROLS FOR CWA SECTION 303(D) WATERS</b>				
Not targeted	0 projects required to implement additional controls for CWA Section 303(d) waters	---	The City requires additional controls to be implemented for Clean Water Act (CWA) Section 303(d) waters. Load reductions are not tracked.	Not targeted

**Table 3.3 – Construction Site Inventory**

Permit Number	Advanced Treatment Controls Required (Y/N)	Priority (High, Medium, Low)	Period of Time (# Weeks) Site Active During Rainy Season (October - April)	Total Number of Inspections - Rainy Season	Total Number of Inspections - Dry Season	Total Number of Inspections	General Results of Inspection	Street Number	Street Name	Inspection Status Date	Inspection Results Date	Number of Violations / Enforcement Action Type (VW, NOV, NOA)
4	N	Low		2	---	2	BMP SEDIMENT CONTROL	175	CARNATION	02/26/08	02/27/07	---
25	N	Low	---	---	1	1	BMP SEDIMENT CONTROL	762	GEORGIA	08/22/07	08/22/07	---
28	N	Low		2	---	2	BMP SEDIMENT CONTROL	1270	FLORENCE	12/17/07	02/22/07	---
39	N	High	---	---	2	2	BMP SEDIMENT CONTROL	1500	SEACOAST	06/16/08	06/12/08	---
53	N	Low		2	1	3	BMP SEDIMENT CONTROL	1360	EAST	04/14/08	04/08/08	---
										06/17/08	06/17/08	---
69	N	Low	---	---	2	2	BMP SEDIMENT CONTROL	419	CARNATION	05/19/08	05/13/08	---
101	N	Low		2	1	3	BMP SEDIMENT CONTROL	349	ELKWOOD	07/17/07	07/17/07	---
								1016	12TH	04/18/08	03/26/08	---
104	N	Low		2	---	2	BMP MATERIAL DLVRY / STORAGE	1265	11TH	04/18/08	04/03/08	---
							BMP SEDIMENT CONTROL	1265	11TH	04/18/08	04/03/08	---
105	N	Low				---	BMP MATERIAL DLVRY / STORAGE	912	EMORY	04/18/08	03/27/08	---
106	N	Low		2	---	2	BMP SEDIMENT CONTROL	383	PALM	04/18/08	04/18/08	---
										06/23/08	06/23/08	---
108	---					---	BMP MATERIAL DLVRY / STORAGE	304	DAHLIA	04/18/08	04/10/08	---
109	N	Low		2	---	2	BMP SEDIMENT CONTROL	1310	FERN	04/18/08	04/04/08	---
113	N	Low	---	---	1	1	BMP SEDIMENT CONTROL	933	EMORY	06/16/08	06/16/08	---
114	N	Low	---	---	2	2	BMP SEDIMENT CONTROL	963	FLORENCE	07/16/07	07/03/07	---
119	N	Low	---	---	2	2	BMP SEDIMENT CONTROL	222	ELM	05/19/08	05/14/08	---
								254	ELM	10/17/07	10/03/07	---
122	N	Low		2	---	2	BMP SEDIMENT CONTROL	1187	DONAX	04/30/08	04/29/08	---
123	N	Low	---	---	2	2	BMP SEDIMENT CONTROL	830	GEORGIA	08/28/07	08/09/07	---

**Table 3.3 – Construction Site Inventory**

Permit Number	Advanced Treatment Controls Required (Y/N)	Priority (High, Medium, Low)	Period of Time (# Weeks) Site Active During Rainy Season (October - April)	Total Number of Inspections - Rainy Season	Total Number of Inspections - Dry Season	Total Number of Inspections	General Results of Inspection	Street Number	Street Name	Inspection Status Date	Inspection Results Date	Number of Violations / Enforcement Action Type (VW, NOV, NOA)
125	N	Low	---	---	1	1	BMP SEDIMENT CONTROL	742	3RD	05/28/08	05/28/08	---
129	N	Low		2	---	2	BMP SEDIMENT CONTROL	455	PALM	04/30/08	04/28/08	---
130	N	Low		2	---	2	BMP SEDIMENT CONTROL	455	PALM	04/30/08	04/29/08	---
	N	Low	---	---	3	3		549	DAHLIA	06/02/08	05/30/08	---
										06/16/08	06/16/08	---
136	N	Low		2	---	2	BMP SEDIMENT CONTROL	1242	13TH	10/17/07	10/02/07	---
140	N	Low	---	---	2	2	BMP SEDIMENT CONTROL	992	PALM	05/13/08	05/12/08	---
143	N	Low	---	---	1	1	BMP SEDIMENT CONTROL	383	PALM	05/05/08	05/05/08	---
148	N	Low	---	---	3	3	BMP SEDIMENT CONTROL	1026	IMPERIAL BEACH	05/19/08	05/19/08	---
										05/22/08	04/22/08	---
149	N	Low	---	---	2	2	BMP SEDIMENT CONTROL	764	5TH	05/13/08	05/08/08	---
156	N	Low	---	---	2	2	BMP SEDIMENT CONTROL	815	ENCINA	06/16/08	06/12/08	---
159	N	Low		1	---	1	BMP SEDIMENT CONTROL	1140	GEORGIA	11/26/07	11/26/07	---
173	N	Low	---	---	2	2	BMP SEDIMENT CONTROL	646	ALABAMA	06/02/08	05/14/08	---
174	N	Low	---	---	1	1	BMP SEDIMENT CONTROL	714	HICKORY	08/28/07	08/28/07	---
175	N	Low		---	1	1	BMP SEDIMENT CONTROL	1101	PALM	11/30/07	11/30/07	---
178	N	Low	---	---	1	1	BMP SEDIMENT CONTROL	737	HEMLOCK	08/16/07	08/16/07	---
187	N	Low	---	---	2	2	BMP SEDIMENT CONTROL	137	EBONY	07/23/07	07/18/07	---
191	N	Low	---	---	2	2	BMP SEDIMENT CONTROL	1361	IMPERIAL BEACH	06/11/08	06/10/08	---
195	N	Low	---	---	1	1	BMP SEDIMENT CONTROL	455	PALM	06/16/08	06/16/08	---
196	N	High	---	---	2	2	BMP SEDIMENT CONTROL	1460	SEACOAST	06/02/08	05/28/08	---
198	N	High	---	---	2	2	BMP SEDIMENT CONTROL	725	SEACOAST	06/18/08	06/17/08	---
201	N	Low	---	---	1	1	BMP SEDIMENT CONTROL	1000	2ND	06/24/08	06/24/08	---
208	N	Low	---	---	1	1	BMP SEDIMENT CONTROL	363	PALM	06/25/08	06/25/08	---

**Table 3.3 – Construction Site Inventory**

Permit Number	Advanced Treatment Controls Required (Y/N)	Priority (High, Medium, Low)	Period of Time (# Weeks) Site Active During Rainy Season (October - April)	Total Number of Inspections - Rainy Season	Total Number of Inspections - Dry Season	Total Number of Inspections	General Results of Inspection	Street Number	Street Name	Inspection Status Date	Inspection Results Date	Number of Violations / Enforcement Action Type (VW, NOV, NOA)
213	N	Low	--	--	2	2	BMP SEDIMENT CONTROL	1167	5TH	07/16/07	07/13/07	---
220	N	Low	---	---	2	2	BMP SEDIMENT CONTROL	874	8TH	06/11/08	06/10/08	---
226	N	Low	---	---	1	1	BMP SEDIMENT CONTROL	1373	HEMLOCK	06/23/08	06/23/08	---
237	N	Low		2	---	2	BMP SEDIMENT CONTROL	1228	12TH	10/17/07	10/03/07	---
249	N	Low		2	---	2	BMP SEDIMENT CONTROL	1044	FERN	10/30/07	10/29/07	---
253	N	Low		2	---	2	BMP SEDIMENT CONTROL	1056	13TH	10/17/07	10/05/07	---
258	N	Low		1	---	1	BMP SEDIMENT CONTROL	1006	HEMLOCK	09/04/07	09/04/07	---
265	N	Low		2	---	2	BMP SEDIMENT CONTROL	140	CALLA	10/31/07	10/30/07	---
271	N	Low		1	---	1	BMP SEDIMENT CONTROL	961	FLORENCE	09/11/07	09/11/07	---
286	N	Low		2	---	2	BMP SEDIMENT CONTROL	1236	EMORY	10/17/07	10/03/07	---
341	N	Low		2	---	2	BMP SEDIMENT CONTROL	1277	14TH	04/09/08	04/04/08	---
350	N	Low		2	---	2	BMP SEDIMENT CONTROL	625	SILVER STRAND	03/12/08	03/10/08	---
357	N	Low		2	---	2	BMP SEDIMENT CONTROL	625	SILVER STRAND	02/13/08	02/12/08	---
358	N	Low		2	---	2	BMP SEDIMENT CONTROL	1016	12TH	04/30/08	04/28/08	---
391	N	Low		2	---	2	BMP SEDIMENT CONTROL	1234	LOUDEN	01/07/08	12/27/07	---

## **4.0 MUNICIPAL COMPONENT**

### **4.1 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 Department of Public Works and its efforts to reduce municipal discharges of pollutants to the MS4 to the maximum extent practicable (MEP).

### **4.2 Level 1 Outcomes – Management Program Activities**

#### **4.2.1 Program Planning and Administration**

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

The City's implementation and assessment strategy for the municipal component is described in the *JURMP Section 6.0*. Figure 4.1 provides an overview of the major elements of this strategy as it was implemented during FY 2007-08.

#### **4.2.2 Management Program Implementation**

The Management Program Implementation element of the Annual Report addresses requirements, training, inspections, public awareness and response, and surveys and special investigations. Table 4.2 presents and describes targeted FY 2007-08 outcomes and results, as well as implementation targets for FY 2008-09. Additional documentation, analysis, and discussion is provided in Table 4.2, and Figures 4.2 and 4.3.

### **4.3 Outcomes Targeted for Staff Implementing Control Measures**

#### **4.3.1 Outcome Level 2 – Knowledge and Awareness**

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

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

The *JURMP Appendix E* defines minimum BMP requirements applicable to streets, roads, highways, and municipal parking facilities in the City. BMPs applicable to these facilities were updated as part of the City's JURMP revision, submitted on March 24, 2008. FY 2007-08 changes included in that update are described in Table 4.2. BMP requirements were reviewed

for necessary updates or modifications subsequent to the completion of FY 2007-08; additional modifications to the BMP requirements of this element were not determined to be necessary as a result of this review.

#### **4.3.3 Outcome Level 4 – Source Load Reductions**

The City maintained approximately 125 miles of curbed streets and uncurbed roads located throughout the City during FY 2007-08. Approximately five miles of underground piping, 117 catch basins and inlets, seven open drainage facilities, over 30 acres of park facilities, athletic fields, beach accesses, and landscapes at various civic facilities, and five community parks located throughout the City were maintained during FY 2007-08. In addition, 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. Table 4.2 provides a breakdown of the municipality by type and by priority category, and describes changes made to the inventory since its last update. A history of source load reductions for the Municipal Component is shown in Figures 4.2 and 4.3.

Level 1 Outcomes (Management Program Activities)		Outcomes Targeted for Staff Implementing Control Measures		
		Outcome Level 2	Outcome Level 3	Outcome Level 4
<b>1.A. Program Planning and Administration</b>	<b>1.B. Management Program Implementation</b>	<b>Knowledge and Awareness</b>	<b>Behaviors and BMP Implementation</b>	<b>Source Load Reductions from Streets, Roads, Highways, and Municipal Parking Facilities</b>
<p><b>1. FY 2007-08 Program Updates</b></p> <ul style="list-style-type: none"> <li>▪ Modifications to JURMP</li> <li>▪ Updates to program documentation</li> <li>▪ Updates to training content &amp; materials</li> </ul> <p><b>2. FY 2008-09 Program Review and Update</b></p> <ul style="list-style-type: none"> <li>▪ Year-end program review</li> <li>▪ Updated source inventory</li> </ul>	<p><b>1. Jurisdictional Requirements for Project Approval</b></p> <p><b>2. Municipal Staff Training</b></p> <ul style="list-style-type: none"> <li>▪ Program Administration Staff</li> <li>▪ Program Implementation Staff</li> </ul> <p><b>3. Maintenance Inspections</b></p> <p><b>4. Stormwater Hot Line Operation (619-424-4095)</b></p> <p><b>5. Surveys and Special Investigations</b></p> <p><i>Not targeted or assessed</i></p>	<p><b>A. Illicit Discharge Reporting Responsibilities</b></p> <p><i>Not targeted or assessed</i></p> <p><b>B. Core Concepts</b></p> <p><i>Not targeted or assessed</i></p> <p><b>C. Implementation Responsibilities</b></p> <p><i>Not targeted or assessed</i></p>	<p><b>A. Sweeping/Non-sweeping Activities</b></p> <p><b>B. Municipal Maintenance Activities</b></p> <ul style="list-style-type: none"> <li>▪ Procedural and Administrative Behaviors</li> <li>▪ BMP implementation</li> <li>▪ Illicit discharge control</li> </ul> <p><b>C. Public Service Requests</b></p> <ul style="list-style-type: none"> <li>▪ Response to requests</li> </ul> <p><b>D. Adopt-a-Road Activities</b></p> <ul style="list-style-type: none"> <li>▪ Public participation and involvement</li> </ul>	<p><b>A. Debris Removal (Sweeping Activities)</b></p> <p><b>B. Debris Removal (Non-sweeping Activities)</b></p>

Figure 4.1 – FY 2007-08 Implementation and Assessment Strategy for the Municipal Component

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

Category	Miles	Number	Description of Changes
<b>A. Type of Facility</b>			
Paved Roads	127.9	---	
Unpaved Roads	---	---	
Municipal Parking Facilities	---	4	
Underground piping	5	---	
Catch basins/Inlets	---	117	
Open Drainage Facilities	---	7	
<b>B. Priority Classification</b>			
<u>Streets, Roads, and Highways</u>			This is the first year that municipal inventory statistics have been tracked by priority classification. Future JURMP Annual Reports will provide a description of significant year-to-year changes.
High (Commercial areas)	19.2	---	
Medium (Beachfront residential areas)	9.6	---	
Low (Other residential areas and paved alleys)	99.1	---	
<u>Municipal Parking Facilities</u>			
High (Commercial)		4	
Medium (N/A)	---	---	
Low (N/A)	---	---	
<u>MS4 Facilities</u>			
Underground piping	5	---	
Catch basins/Inlets	---	117	

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

Category	Miles	Number	Description of Changes
Open Drainage Facilities	---	7	
<u>Sanitary Sewer System</u>			
Pump stations		12	
Underground piping	39.5		
<b>C. Totals</b>			
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 2007-08 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 – Targeted Outcomes and Results for the Municipal Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>LEVEL 1 OUTCOMES (MANAGEMENT PROGRAM ACTIVITIES)</b>				
<b>A. PROGRAM PLANNING AND ADMINISTRATION</b>				
<b>1. FY 2007-08 PROGRAM UPDATES</b>				
<b>A) MODIFICATIONS TO JURMP</b>				
Update applicable JURMP sections per new Permit requirements	Applicable JURMP sections updated 03-24-08	Completion	Applicable updates were included in <b>JURMP Section 6.0</b> , submitted to the RWQCB on 03-24-08.	Complete and identify FY 2008-09 JURMP modifications
<b>B) UPDATES TO PROGRAM DOCUMENTATION (POLICIES, PLANS, PROCEDURES, GUIDELINES, AND FORMS)</b>				
---	---	---	No program policies, plans, procedures, guidelines, or forms have yet been developed.	Update [develop] road maintenance procedures for consistency with program updates
<b>C) UPDATES TO TRAINING PROGRAM</b>				
---	---	---	<b>JURMP Section 10.0</b> establishes updated standards for training municipal staff. Since these standards will take effect during FY 2008-09, training content and materials will be updated accordingly.	Update staff training materials for consistency with updated standards of JURMP Section 10.0

**Table 4.2 – Targeted Outcomes and Results for the Municipal Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>2. FY 2008-09 PROGRAM REVIEW AND UPDATE</b>				
<b>A) YEAR-END PROGRAM REVIEW</b>				
Complete annual year-end program review	Review underway	In progress	An annual program review for this element is underway during the development of this JURMP Annual Report. JURMP modifications recommended or planned as a result of this review are presented herein.	Complete annual year-end program review
<b>B) UPDATED SOURCE INVENTORY</b>				
Update roads inventory	Update not needed	N/A	The City was required to update its inventory of municipal facilities subsequent to the completion of FY 2007-08. This update was not necessary as the City has been developed, and no new roads or storm drains were added.	Update municipal inventory
<b>B. MANAGEMENT PROGRAM IMPLEMENTATION</b>				
<b>1. Jurisdictional Requirements for Project Approval</b>				
Require projects to implement BMPs	Requirements implemented	Completion	All development and redevelopment projects are required to implement measures to reduce pollutants and runoff to the MEP.	Condition projects with appropriate BMPs prior to permit approval
<b>2. Municipal Staff Training</b>				
Provide training for FY 2007-08	Training provided	Completion	Continuing with FY 2008-09, training results for staff with responsibilities applicable to this element will be included as part of this annual report section.	Provide training to all staff with identified responsibilities
<b>3. Maintenance Inspections</b>				
Inspect road, parking facilities,	Inspections done annually	Completion	All City-maintained roads, parking facilities, and storm drains are formally inspected annually. Other municipal areas and activities	Inspect municipal facilities

**Table 4.2 – Targeted Outcomes and Results for the Municipal Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
storm drains, and other municipal areas and activities			not identified as high priority are inspected as needed. During inspection, needed repairs are noted and scheduled, and maintenance is performed as appropriate. In addition to evaluating the road conditions, maintenance crews also evaluated potential stormwater impacts and identified sweeping, cleaning, and maintenance needs. Conveyance system and road right-of-way cleaning conducted as a result of these inspections is included in this section.	
Identify any MS4 facility found to require inspection less than annually	Review underway	In progress	Identify any MS4 facility found to require inspection less than annually following two years of inspection, and include justification for the finding.	Not targeted until FY 2009-10
<b>4. Storm Water Hotline Operation</b>				
Operate a hotline to provide the public opportunities to report trash and debris in roadways.	Hotline operated throughout reporting period	Confirmation	A Storm Water Hotline (619-424-4095) was operated throughout FY 2007-08 to provide the public a means of reporting accumulated trash or debris in City-maintained roadways and the MS4. 38 reports of trash and debris were received during the reporting period. See Level 4 Outcomes (below).	Operate a hotline to provide the public opportunities to report trash and debris in the City.
<b>5. Surveys and Special Investigations</b>				
Not targeted or assessed	---	---	Special investigations were not conducted in FY 2007-08, and are not routinely conducted as part of the implementation strategy for this program element. None are planned for FY 2008-09.	Not targeted
Not targeted or assessed	---	---	Surveys of staff knowledge were not conducted during FY 2007-08. Beginning in FY 2008-09, surveys will routinely be incorporated before and after training as a means of evaluating training success and of monitoring staff knowledge from year to year.	Survey staff to ascertain baseline levels of knowledge concerning basic principles and specific job responsibilities.

**Table 4.2 – Targeted Outcomes and Results for the Municipal Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY STAFF AND CONTRACTORS)</b>				
Not targeted or assessed	---	---	Starting in FY 2008-09, the City will begin incorporating testing before and after municipal staff training to evaluate the training success and to determine whether changes in knowledge are being retained over time. Anticipated content includes illicit discharge reporting responsibilities, core concepts (e.g., What is a watershed?), and specific job responsibilities.	Establish a baseline of staff knowledge regarding applicable program content
<b>LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY STAFF AND CONTRACTORS)</b>				
<b>A. SWEEPING / NON-SWEEPING ACTIVITIES</b>				
<b>1. Improved Streets, Roads, and Highways</b>				
<b>July 1, 2007 through June 30, 2008</b>				
Sweep all High TTWQ facilities at least twice per month	28.7 curb-miles swept at least twice per month	Completion	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 TTWQ).  All other areas (99.1 curb miles) are considered moderate priority and are swept on a monthly basis.	Sweep all High TTWQ facilities at least twice per month
Sweep all Moderate TTWQ facilities at least monthly	99.1 curb-miles swept at least monthly	Completion		Sweep all Moderate TTWQ facilities at least monthly
Sweep all Low TTWQ facilities at least once (0)	N/A	N/A		Sweep all Low TTWQ facilities at least once
Sweep improved streets, roads, and highways	127.9 curb-miles swept (2,392 total miles)	Completion		Sweep at least the total minimum number of curb-miles required to

**Table 4.2 – Targeted Outcomes and Results for the Municipal Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
	swept)			meet Permit-prescribed frequencies for all improved streets
<b>2. Improved Municipal Parking Facilities</b>				
<b>July 1, 2007 through June 30, 2008</b>				
Sweep all High TTWQ parking facilities at least twice per month	4 facilities swept at least twice per month	Completion		Sweep all High TTWQ parking facilities at least twice per month
Sweep all Moderate TTWQ parking facilities at least monthly	0 facilities swept at least monthly	N/A		Sweep all Moderate TTWQ parking facilities at least monthly
Sweep all Low TTWQ parking facilities at least once	0 facilities swept at least once	N/A		Sweep all Low TTWQ parking facilities at least once
<b>3. Municipal Separate Storm Sewer System (MS4)</b>				
<b>July 1, 2007 through June 30, 2008</b>				
Clean accumulations of trash and debris greater than 33% of design capacity	24,481 feet of storm drain cleaned	Completion	There are approximately 117 catch basins and inlets that are inspected annually, and, if necessary, are cleaned if trash is observed.	Clean accumulations of trash and debris greater than 33% of design capacity
Inspect MS4 facilities at least once a year	24,481 feet of storm drain inspected	Completion		Clean accumulations of trash and debris

**Table 4.2 – Targeted Outcomes and Results for the Municipal Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
between May 1 and September 30 for all MS4 facilities that receive or collect high volumes of trash and debris. All other facilities shall be inspected at least annually.				greater than 33% of design capacity
Following two years of inspections, any MS4 facility that requires inspection and cleaning less than annually may be inspected as needed, but not less than every other year	Review underway	In progress		Inspect MS4 facilities not listed as high priority as needed, but not less than every other year.
<b>4. Sewer System Maintenance and Spill Prevention</b>				
<b>July 1, 2007 through June 30, 2008</b>				
Prevent and eliminate infiltration from the sanitary sewer to the MS4	39.5 miles of sanitary sewer system inspected	Completed	The City has conducted a sewer capacity study and identified areas needing improvement. These will be undertaken through the Capital Improvement Projects program. A Sewer System Management Plan was also completed in accordance with Waste Discharge Requirements.	Inspect sanitary sewer system for leaks to MS4
Conduct routine maintenance on sanitary sewer	39.5 miles of sanitary sewer system maintained	Completed	Most sanitary sewer pipelines are cleaned at least annually, and known problem areas are cleaned more frequently. Twelve alarmed sewage pump stations are monitored daily.	Conduct routine maintenance on and cleaning of

**Table 4.2 – Targeted Outcomes and Results for the Municipal Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
system				sanitary sewer system to prevent spills and discharges to MS4
<b>5. Management of Pesticides, Herbicides, and Fertilizers</b>				
<b>July 1, 2007 through June 30, 2008</b>				
Implement BMPs to reduce the contribution of pollutants to MS4	Requirements implemented	Completed	The City limits the application of pesticides and herbicides in accordance with Integrated Pest Management Program policy.	Implement IPM BMPs
<b>B. MUNICIPAL MAINTENANCE ACTIVITIES</b>				
Not targeted or assessed	---	---	The City enforces compliance at all municipal facilities, and does not currently consider Level 3 assessment of municipal maintenance activities to be applicable or feasible.	Not targeted
<b>C. PUBLIC SERVICE REQUESTS</b>				
Respond to all road service requests received	N/A	N/A	The City does not currently track public service requests for road maintenance activities.	Respond to all road service requests received
Respond to all sewer spills received and log in appropriate data bases	6 sewer spills reported	Completed	In the event of a sewer spill, City staff follows procedures laid out in its Sanitary Sewer Overflow Response Plan. All sewer spills during FY 07-08 were from private laterals.	Respond to and report all sewer spills received
<b>D. ADOPT-A-ROAD ACTIVITIES</b>				
Not targeted	0 volunteers participated in program	---	The City currently does not participate in Adopt-a-Road activities.	Not targeted

**Table 4.2 – Targeted Outcomes and Results for the Municipal Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
Not targeted	0 miles of road adopted and cleaned	---		Not targeted
<b>LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM THE MUNICIPALITY INCLUDING THE MS4)</b>				
<b>A. DEBRIS REMOVAL (SWEEPING ACTIVITIES)</b>				
Not targeted	150 tons of debris removed through sweeping of streets, roads, highways, and municipal parking facilities		The amounts of debris collected are highly variable from year to year, as shown in Figure 4.2. Therefore, even though the overall yield of debris from sweeping this year was a little higher, this should not be interpreted as a trend. The City will continue to monitor results over a longer period, but believes its existing resources and schedules are properly allocated.	Not targeted
<b>B. REMOVAL (NON-SWEEPING ACTIVITIES)</b>				
Not targeted	---	---	The City does not currently track this element of trash and debris along City-maintained roads.	Not targeted
Clean accumulations of trash and debris in the MS4 greater than 33% of design capacity	3 tons of trash, debris and organic matter removed from MS4		There are approximately 117 catch basins and inlets that are inspected annually, and, if necessary, are cleaned if trash is observed. The amounts of debris collected are highly variable from year to year, as shown in Figure 4.3. Therefore, even though the overall yield of debris from cleaning this year was considerably reduced, this should not be interpreted as a trend. The City will continue to monitor results over a longer period, but believes its existing resources and schedules are properly allocated.	Clean accumulations of trash and debris in the MS4 greater than 33% of design capacity

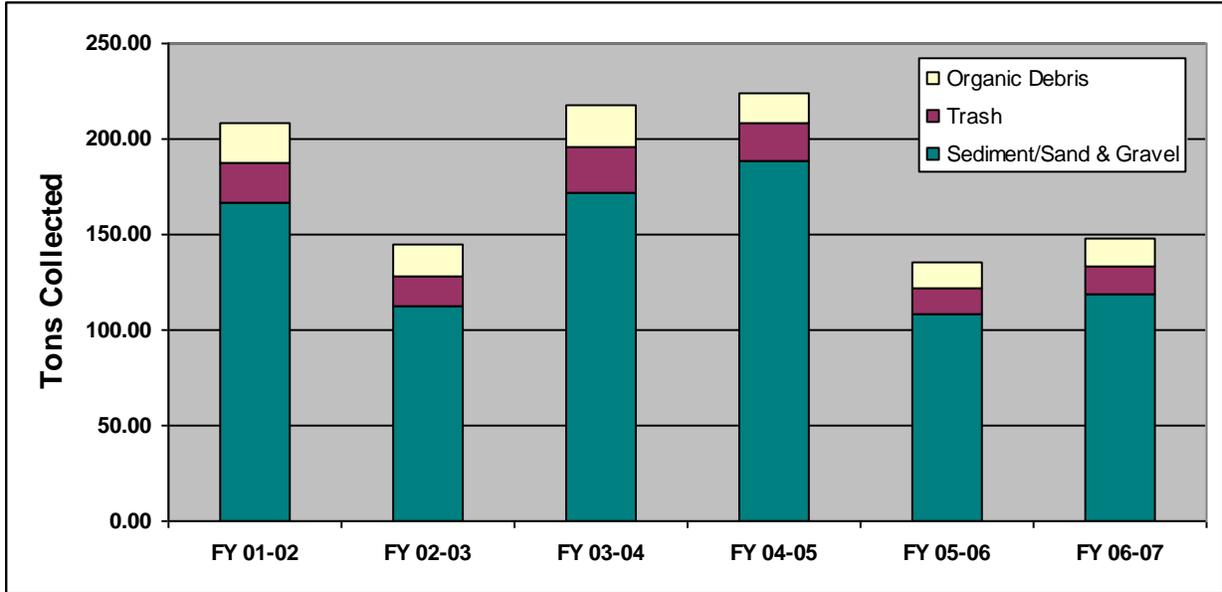


Figure 4.2 – Street Sweeping Removal Totals (add 2008)

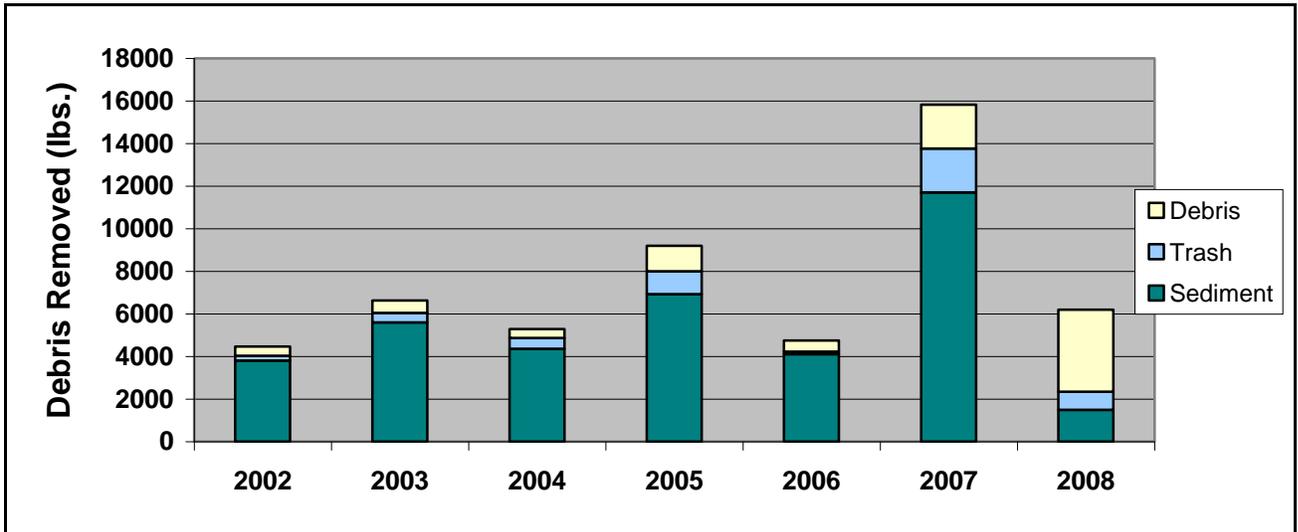


Figure 4.3 – Storm Drain Conveyance System Cleaning Totals

## **5.0 INDUSTRIAL AND COMMERCIAL COMPONENT**

### **5.1 Introduction**

The City endeavors to reduce and prevent industrial and commercial discharges of pollutants to the MS4 and from those discharges 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 oversee compliance with urban runoff regulations at businesses within the City and reduce municipal discharges of pollutants to the MS4 to the maximum extent practicable (MEP).

### **5.2 Level 1 Outcomes – Management Program Activities**

#### **5.2.1 Program Planning and Administration**

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

The City's implementation and assessment strategy for the industrial and commercial component is described in the *JURMP Section 7.0*. Figure 5.1 provides an overview of the major elements of this strategy as it was implemented during FY 2007-08.

#### **5.2.2 Management Program Implementation**

The Management Program Implementation element of the Annual Report addresses requirements, training, inspections, public awareness and response, and surveys and special investigations. Table 5.2 presents and describes targeted FY 2007-08 outcomes and results, as well as implementation targets for FY 2008-09. Additional documentation, analysis, and discussion is provided in Table 5.2.

### **5.3 Outcomes Targeted for Staff Implementing Control Measures**

#### **5.3.1 Outcome Level 2 – Knowledge and Awareness**

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

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

The JURMP Appendix F defines minimum BMP requirements applicable to industrial and commercial projects in the City. BMPs applicable to these facilities were updated as part of the

City's JURMP revision, submitted on March 24, 2008. FY 2007-08 changes included in that update are described in Table 5.2. BMP requirements were reviewed for necessary updates or modifications subsequent to the completion of FY 2007-08; additional modifications to the BMP requirements of this element were not determined to be necessary as a result of this review.

### **5.3.3 Outcome Level 4 – Source Load Reductions**

The City maintains a watershed-based inventory of all industrial and commercial facilities located within its jurisdiction that could contribute a significant pollutant load to the MS4. Table 5.2 provides a breakdown of the facilities, and describes changes made to the inventory since its last update.

Level 1 Outcomes (Management Program Activities)		Outcomes Targeted for Staff Implementing Control Measures		
		Outcome Level 2	Outcome Level 3	Outcome Level 4
<b>1.A. Program Planning and Administration</b>	<b>1.B. Management Program Implementation</b>	<b>Knowledge and Awareness</b>	<b>Behaviors and BMP Implementation</b>	<b>Source Load Reductions from Industrial and Commercial Sites</b>
<p><b>1. FY 2007-08 Program Updates</b></p> <ul style="list-style-type: none"> <li>▪ Modifications to JURMP</li> <li>▪ Updates to program documentation</li> <li>▪ Updates to training content &amp; materials</li> </ul> <p><b>2. FY 2008-09 Program Review and Update</b></p> <ul style="list-style-type: none"> <li>▪ Year-end program review</li> <li>▪ Updated source inventory</li> </ul>	<p><b>1. Jurisdictional Requirements for Industrial and Commercial Sites</b></p> <p><b>2. Municipal Staff Training</b></p> <ul style="list-style-type: none"> <li>▪ Program Administration Staff</li> <li>▪ Program Implementation Staff</li> </ul> <p><b>3. Commercial Site Inspections</b></p> <p><b>4. Stormwater Hot Line Operation (619-424-4095)</b></p> <p><b>5. Surveys and Special Investigations</b></p> <p><i>Not targeted or assessed</i></p>	<p><b>A. Industrial and Commercial Site Responsibilities</b></p> <p><i>Not targeted or assessed</i></p> <p><b>B. Core Concepts</b></p> <p><i>Not targeted or assessed</i></p> <p><b>C. Implementation Responsibilities</b></p> <p><i>Not targeted or assessed</i></p>	<p><b>A. Industrial and Commercial Activities</b></p> <ul style="list-style-type: none"> <li>▪ Procedural and Administrative Behaviors</li> <li>▪ BMP implementation</li> <li>▪ Illicit discharge control</li> </ul> <p><b>B. Public Service Requests</b></p> <p><i>Not targeted or assessed</i></p>	<p><b>A. General site management requirements</b></p> <p><b>B. BMP maintenance</b></p> <p><i>Not targeted or assessed</i></p> <p><b>C. BMP effectiveness</b></p> <p><i>Not targeted or assessed</i></p>

Figure 5.1 – FY 2007-08 Implementation and Assessment Strategy for the Industrial and Commercial Component

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

Category	Number	Description
<b>A. Type of Facility</b>		
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	27	
<b>B. Priority Classification</b>		
High	24	
Medium	3	
Low	---	
<b>C. Totals</b>		
High	24	
Medium	3	
Low	---	
<b>JURMP Sections</b>		<b>Description of FY 2007-08 Changes</b>
7.0 and Appendix F		BMP requirements of the JURMP applicable to industrial and commercial facilities were modified in accordance with the requirements of the updated Permit in March 2008.

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

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>LEVEL 1 OUTCOMES (MANAGEMENT PROGRAM ACTIVITIES)</b>				
<b>A. PROGRAM PLANNING AND ADMINISTRATION</b>				
<b>1. FY 2007-08 PROGRAM UPDATES</b>				
<b>A) MODIFICATIONS TO JURMP</b>				
Update applicable JURMP sections per new Permit requirements	Applicable JURMP sections updated 03-24-08	Completion	Applicable updates were included in <b>JURMP Section 7.0</b> , submitted to the RWQCB on 03-24-08.	Complete and identify FY 2008-09 JURMP modifications
<b>B) UPDATES TO PROGRAM DOCUMENTATION (POLICIES, PLANS, PROCEDURES, GUIDELINES, AND FORMS)</b>				
---	---	---	No program policies, plans, procedures, guidelines, or forms have yet been developed.	Update [develop] road maintenance procedures for consistency with program updates
<b>C) UPDATES TO TRAINING PROGRAM</b>				
---	---	---	<b>JURMP Section 10.0</b> establishes updated standards for training municipal staff. Since these standards will take effect during FY 2008-09, training content and materials will be updated accordingly.	Update staff training materials for consistency with updated standards of JURMP Section 10.0
<b>2. FY 2008-09 PROGRAM REVIEW AND UPDATE</b>				
<b>A) YEAR-END PROGRAM REVIEW</b>				
Complete annual year-end program	Review underway	In progress	An annual program review for this element is underway during the development of this JURMP Annual Report. JURMP modifications	Complete annual year-end program

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

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
review			recommended or planned as a result of this review are presented herein.	review
<b>B) UPDATED SOURCE INVENTORY</b>				
Update commercial inventory	Update underway	In progress	The City is updating its commercial inventory.	Update commercial inventory
<b>B. MANAGEMENT PROGRAM IMPLEMENTATION</b>				
<b>1. Jurisdictional Requirements for Industrial and Commercial Sites</b>				
Require sites to implement BMPs	Requirements implemented	Completion	All industrial and commercial sites are required to implement measures to reduce pollutants and runoff to the MEP.	Require sites to use appropriate BMPs
<b>2. Municipal Staff Training</b>				
Provide training for FY 2007-08	Training provided	Completion	Continuing with FY 2008-09, training results for staff with responsibilities applicable to this element will be included as part of this annual report section.	Provide training to all staff with identified responsibilities
<b>3. Commercial Site Inspections</b>				
Inspect commercial sites and activities	Inspections done annually	Completion	Commercial businesses are inspected as per the Municipal Permit. The City does not contract out inspections; therefore, no third party inspections were conducted. Efforts to address mobile businesses are underway through the Copermittee workgroup, and the City will conduct inspections of mobile sources through the FY 2008-09 as necessary.	Inspect commercial facilities, including mobile sources as necessary
<b>4. Storm Water Hotline Operation</b>				
Operate a hotline to provide the public opportunities	Hotline operated throughout reporting period	Confirmation	A Storm Water Hotline (619-424-4095) was operated throughout FY 2007-08 to provide the public a means of reporting businesses not in compliance.	Operate a hotline

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

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
to report businesses not in compliance.				
<b>5. Surveys and Special Investigations</b>				
Not targeted or assessed	---	---	Special investigations were not conducted in FY 2007-08, and are not routinely conducted as part of the implementation strategy for this program element. None are planned for FY 2008-09.	Not targeted
Not targeted or assessed	---	---	Surveys of staff knowledge were not conducted during FY 2007-08. Beginning in FY 2008-09, surveys will routinely be incorporated before and after training as a means of evaluating training success and of monitoring staff knowledge from year to year.	Survey staff to ascertain baseline levels of knowledge concerning basic principles and specific job responsibilities.
<b>LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY STAFF AND BUSINESSES)</b>				
Not targeted or assessed	---	---	Starting in FY 2008-09, the City will begin incorporating testing before and after municipal staff training to evaluate the training success and to determine whether changes in knowledge are being retained over time. Anticipated content includes illicit discharge reporting responsibilities, core concepts (e.g., What is a watershed?), and specific job responsibilities.	Establish a baseline of staff knowledge regarding applicable program content

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

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY STAFF AND BUSINESSES)</b>				
<b>A. INDUSTRIAL AND COMMERCIAL ACTIVITIES</b>				
<b>1. Procedural and Administrative Behaviors</b>				
<b>July 1, 2007 through June 30, 2008</b>				
Inspect businesses for compliance	27 sites inspected	Completion	The City inspects all inventoried businesses as per the requirements of the Municipal Permit Section D.3.b(3)(b). The City used these factors to develop the threat-to-water-quality (TTWQ) criteria for identifying high and non-high priority facilities. The first year of the Municipal Permit required the City to inspect a minimum of 20% of the sites inventoried, and this requirement increases each year. The City inspected 50% of all high priority businesses during the reporting period FY 2007-08. The City inspects those facilities identified as non-high priority only in the event a stormwater concern or violation is identified.	Inspect businesses
Notify business owners/operators of BMP requirements, including mobile businesses	45 sites notified	Completion	The City notifies business owners and operators, both fixed and mobile, of BMP requirements through a combination of methods including site inspections and 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 the City's website, and targeted workshops focused on specific business sectors.	Notify business owners/operators of BMP requirements, including mobile businesses
Enforce compliance and track violations	21 sites with enforcement actions	Completion	The City enforces compliance at all businesses, including mobile sources, using Notices of Abatement and Notices of Violation.	Enforce compliance and track violations

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

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>2. BMP Implementation</b>				
<b>July 1, 2007 through June 30, 2008</b>				
Not targeted or assessed	---	---	Starting in FY 2008-09, the City will begin incorporating evaluation of business owner and operator knowledge of applicable BMPs, and will determine whether knowledge is being retained over time. Anticipated content includes BMP knowledge and implementation, core concepts of good housekeeping practices, and specific responsibilities including employee training.	Establish a baseline of business operator knowledge regarding applicable BMP implementation
<b>3. Illicit Discharge Control</b>				
<b>July 1, 2007 through June 30, 2008</b>				
Investigate complaints	136 Complaints investigated	Completion	All complaints of illicit discharges from business sources including mobile businesses were conducted.	Investigate illicit discharges from businesses
<b>B. PUBLIC SERVICE REQUESTS</b>				
Not targeted or assessed	---	---	The City does not currently track public service requests for industrial and commercial activities.	Not targeted
<b>LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM INDUSTRIAL AND COMMERCIAL COMPONENT)</b>				
<b>A. GENERAL SITE MANAGEMENT REQUIREMENTS</b>				
Not targeted or assessed	---	---	The City does not currently track this element for industrial and commercial activities.	Not targeted
<b>B. BMP MAINTENANCE</b>				
Not targeted	---	---	The City does not currently track BMP maintenance for industrial and commercial activities.	Not targeted

## **6.0 RESIDENTIAL COMPONENT**

### **6.1 Introduction**

The City endeavors to prevent residential discharges to and from the Municipal Separate Storm Sewer System (MS4) and from those discharges 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 oversee compliance with urban runoff regulations.

### **6.2 Level 1 Outcomes – Management Program Activities**

#### **6.2.1 Program Planning and Administration**

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

The City's implementation and assessment strategy for the education component is described in the *JURMP Section 8.0*. Figure 8.1 provides an overview of the major elements of this strategy as it was implemented during FY 2007-08.

During this reporting period, the City participated in the Copermittee Workgroup responsible for developing and implementing the Regional Residential Education Program criteria to be submitted to the Regional Water Quality Control Board for approval.

#### **6.2.2 Management Program Implementation**

The Management Program Implementation element of the Annual Report addresses requirements, training, inspections, public awareness and response, and surveys and special investigations. Table 6.2 presents and describes targeted FY 2007-08 outcomes and results, as well as implementation targets for FY 2008-09. Additional documentation, analysis, and discussion is provided in Table 6.2.

### **6.3 Outcomes Targeted for Staff Implementing Control Measures**

#### **6.3.1 Outcome Level 2 – Knowledge and Awareness**

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

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

The *JURMP Appendix G* defines minimum BMP requirements applicable to residential areas and activities in the City. BMPs applicable to these facilities were updated as part of the City's JURMP revision, submitted on March 24, 2008. FY 2007-08 changes included in that update are described in Table 8.2. BMP requirements were reviewed for necessary updates or modifications subsequent to the completion of FY 2007-08; additional modifications to the BMP requirements of this element were not determined to be necessary as a result of this review.

**6.3.3 Outcome Level 4 – Source Load Reductions**

The City maintained approximately 125 miles of curbed streets and uncurbed roads located throughout the City during FY 2007-08. Approximately five miles of underground piping, 117 catch basins and inlets, seven open drainage facilities, over 30 acres of park facilities, athletic fields, beach accesses, and landscapes at various civic facilities, and five community parks located throughout the City were maintained during FY 2007-08. Table 6.2 provides a breakdown of the municipality by type and by priority category, and describes changes made to the inventory since its last update.

Level 1 Outcomes (Management Program Activities)		Outcomes Targeted for Staff Implementing Control Measures		
		Outcome Level 2	Outcome Level 3	Outcome Level 4
<b>1.A. Program Planning and Administration</b>	<b>1.B. Management Program Implementation</b>	<b>Knowledge and Awareness</b>	<b>Behaviors and BMP Implementation</b>	<b>Source Load Reductions from Residential Areas and Activities</b>
<p><b>1. FY 2007-08 Program Updates</b></p> <ul style="list-style-type: none"> <li>▪ Modifications to JURMP</li> <li>▪ Updates to program documentation</li> <li>▪ Updates to training content &amp; materials</li> </ul> <p><b>2. FY 2008-09 Program Review and Update</b></p> <ul style="list-style-type: none"> <li>▪ Year-end program review</li> <li>▪ Updated source inventory</li> </ul>	<p><b>1. BMP Implementation</b></p> <p><b>2. Municipal Staff Training</b></p> <ul style="list-style-type: none"> <li>▪ Program Administration Staff</li> <li>▪ Program Implementation Staff</li> </ul> <p><b>3. Enforcement of Residential Areas and Activities</b></p> <p><b>4. Evaluation of Oversight of Residential Areas and Activities</b></p> <p><b>5. Surveys and Special Investigations</b></p> <p><i>Not targeted or assessed</i></p>	<p><b>A. Illicit Discharge Reporting</b></p> <p><b>B. Core Concepts</b></p> <p><i>Not targeted or assessed</i></p> <p><b>C. Implementation Responsibilities</b></p> <p><i>Not targeted or assessed</i></p>	<p><b>A. Motor Vehicle and Boat Repair and Maintenance Activities</b></p> <p><i>Not targeted or assessed</i></p> <p><b>B. Home and Garden Care and Maintenance Activities and Product Use</b></p> <p><i>Not targeted or assessed</i></p> <p><b>C. Pet Waste Management</b></p> <p><i>Not targeted or assessed</i></p> <p><b>D. Public Service Requests</b></p> <ul style="list-style-type: none"> <li>▪ Response to requests</li> <li>▪ Facilitation of proper BMPs</li> </ul> <p><b>E. Cleanup Activities</b></p> <p>Public participation and involvement</p>	<p><b>A. Household Hazardous Waste Collected</b></p> <p><b>B. Used Oil Collected</b></p> <p><b>C. Special Event Recycling and Waste Management</b></p>

Figure 6.1 – FY 2007-08 Implementation and Assessment Strategy for the Residential Component

**Table 6.1 – Overview of Residential Component**

Category	Number	Description
<b>A. Threat to Water Quality Prioritization</b>		
High	6	All residential areas of the City are considered high priority.
Medium	---	
Low	---	
JURMP Sections	Description of FY 2007-08 Changes	
8.0 and Appendix G	BMP requirements of the JURMP applicable to residential areas and activities were modified in accordance with the requirements of the updated Permit in March 2008.	

**Table 6.2 – Targeted Outcomes and Results for the Residential Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>LEVEL 1 OUTCOMES (MANAGEMENT PROGRAM ACTIVITIES)</b>				
<b>A. PROGRAM PLANNING AND ADMINISTRATION</b>				
<b>1. FY 2007-08 PROGRAM UPDATES</b>				
<b>A) MODIFICATIONS TO JURMP</b>				
Update applicable JURMP sections per new Permit	Applicable JURMP sections updated 03-24-08	Completion	Applicable updates were included in <b>JURMP Section 8.0</b> , submitted to the RWQCB on 03-24-08.	Complete and identified FY 2008-09 JURMP

**Table 6.2 – Targeted Outcomes and Results for the Residential Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
requirements				modifications
<b>B) UPDATES TO PROGRAM DOCUMENTATION (POLICIES, PLANS, PROCEDURES, GUIDELINES, AND FORMS)</b>				
---	---	---	No program policies, plans, procedures, guidelines, or forms have yet been developed.	Develop residential education for consistency with program updates
<b>C) UPDATES TO TRAINING PROGRAM</b>				
---	---	---	<b>JURMP Section 10.0</b> establishes updated standards for training municipal staff. Since these standards will take effect during FY 2008-09, training content and materials will be updated accordingly.	Update staff training materials for consistency with updated standards of JURMP Section 10.0
<b>2. FY 2008-09 PROGRAM REVIEW AND UPDATE</b>				
<b>A) YEAR-END PROGRAM REVIEW</b>				
Complete annual year-end program review	Review underway	In progress	An annual program review for this element is underway during the development of this JURMP Annual Report. JURMP modifications recommended or planned as a result of this review are presented herein.	Complete annual year-end program review
<b>B) UPDATED SOURCE INVENTORY</b>				
Identify high threat to water quality areas	Update not needed	N/A	The City has previously identified the high threat to water quality residential areas and activities that were focused on subsequent to the completion of FY 2007-08.	Update as needed

**Table 6.2 – Targeted Outcomes and Results for the Residential Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>B. MANAGEMENT PROGRAM IMPLEMENTATION</b>				
<b>1. BMP Implementation</b>				
Require residents to implement BMPs	Requirements implemented	Completion	All residents are required to implement measures to reduce pollutants and runoff to the MEP.	Provide BMP handouts and outreach
Facilitate proper management and disposal of household hazardous waste (HHW)	21,100 gallons of used oil collected; 3 tons of HHW collected	Completion	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.	Facilitate proper HHW management and disposal opportunities
Facilitate proper management and disposal of waste	114 tons of trash collected; 18 tons of green waste; 21 tons of metal; 25 tons of concrete	Completion	The City is required to facilitate the proper management and disposal of waste material through educational and public information activities, and establishment of collection sites operated by the City or a private entity. The City partners with EDCO Disposal in an annual Home Front Clean Up drop-off event to collect waste material at Mar Vista High School.	Facilitate proper management and disposal opportunities
<b>2. Municipal Staff Training</b>				
Provide training for FY 2007-08	Training provided	Completion	Continuing with FY 2008-09, training results for staff with responsibilities applicable to this element will be included as part of this annual report section.	Provide training to all staff with identified responsibilities
<b>3. Enforcement of Residential Areas and Activities</b>				
Enforce BMPs	25 Verbal Warnings, 14 Notices of Violation; 7 Notices of Abatement; 3 Cost	Compliance	The City enforces its stormwater 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, including recovery of	Enforce BMPs

**Table 6.2 – Targeted Outcomes and Results for the Residential Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
	Recovery Efforts		compensatory damages for losses to the City of approximately \$1,000.	
<b>4. Evaluation of Oversight of Residential Areas and Activities</b>				
Operate a hotline to provide the public opportunities to report trash and debris in roadways.	Hotline operated throughout reporting period	Confirmation	A Storm Water Hotline (619-424-4095) was operated throughout FY 2007-08 to provide the public a means of reporting accumulated trash or debris in City-maintained roadways and the MS4. 38 reports of trash and debris were received during the reporting period. See Level 4 Outcomes (below).	Operate a hotline to provide the public opportunities to report trash and debris in the City.
<b>5. Surveys and Special Investigations</b>				
Not targeted or assessed	---	---	Special investigations were not conducted in FY 2007-08, and are not routinely conducted as part of the implementation strategy for this program element. None are planned for FY 2008-09.	Not targeted
Not targeted or assessed	---	---	Surveys of residential knowledge were not conducted during FY 2007-08. Surveys may be incorporated at educational events as a means of evaluating awareness. This effort is underway through the Copermitttee workgroup.	Not targeted
<b>LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY STAFF AND RESIDENTS)</b>				
Not targeted or assessed	---	---	Starting in FY 2008-09, the City will begin incorporating testing before and after municipal staff training to evaluate the training success and to determine whether changes in knowledge are being retained over time. Anticipated content includes illicit discharge reporting responsibilities, core concepts (e.g., What is a watershed?), and specific job responsibilities.	Establish a baseline of staff knowledge regarding applicable program content
Not targeted or assessed	---	---	Starting in FY 2008-09, the City will begin evaluating education success and to determine whether changes in knowledge are being retained over time.	Establish a baseline of resident knowledge regarding urban runoff

**Table 6.2 – Targeted Outcomes and Results for the Residential Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY RESIDENTS)</b>				
<b>A. MOTOR VEHICLE AND BOAT REPAIR AND MAINTENANCE ACTIVITIES</b>				
Not targeted or assessed	---	---	The City does not currently consider Level 3 assessment of residential maintenance activities to be applicable or feasible.	Not targeted
<b>B. HOME AND GARDEN CARE AND MAINTENANCE ACTIVITIES AND PRODUCT USE</b>				
Not targeted or assessed	---	---	The City does not currently consider Level 3 assessment of residential maintenance activities to be applicable or feasible.	Not targeted
<b>C. PET WASTE MANAGEMENT ACTIVITIES</b>				
Not targeted or assessed	---	---	The City does not currently consider Level 3 assessment of residential management activities to be applicable or feasible.	Not targeted
<b>D. PUBLIC SERVICE REQUESTS</b>				
Respond to all public service requests received	---	---	The City does not currently consider Level 3 assessment of public service requests to be applicable or feasible.	Not targeted
<b>E. CLEANUP ACTIVITIES</b>				
Not targeted	---	---	The City does not currently consider Level 3 assessment of cleanup activities to be applicable or feasible.	Not targeted
<b>LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM THE RESIDENTIAL COMPONENT)</b>				
<b>A. HOUSEHOLD HAZARDOUS WASTE (HHW) COLLECTED</b>				
Not targeted	3 tons of HHW collected	---	The City's HHW disposal program is available to all residents, and the City partners with other jurisdictions in the South Bay to offer convenient, low-cost HHW disposal options.	Not targeted

**Table 6.2 – Targeted Outcomes and Results for the Residential Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>B. USED OIL COLLECTED</b>				
Not targeted	21,100 gallons of used oil disposed of by residents	---	The City is required to facilitate the proper management and disposal of used oil, toxic materials, and other HHW through educational and public information activities, and establishment of collection sites operated by the City or a private entity.	Not targeted
<b>C. SPECIAL EVENT RECYCLING AND WASTE MANAGEMENT</b>				
Not targeted	88 participants in annual Garage Sale; 742 participants in the annual Home Front Clean Up	---	The City is required to facilitate the proper management and disposal of waste materials, used oil, toxic materials, and other HHW through educational and public information activities, and establishment of collection sites operated by the City or a private entity.	Not targeted

## **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), extended the annual reporting deadline associated with this component from September 30<sup>th</sup> to December 15<sup>th</sup>. This change was necessary because the program involves water quality monitoring during the dry season, defined as May 1<sup>st</sup> through September 30<sup>th</sup>, 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 reduce the impacts of development on water quality. This component is applicable to all targeted communities. City departments, in particular the departments that have the most contact with the general public, including the Community Development Department, and the Capital Improvement Projects Division and the Environmental Program Division of the Department of Public Works, receive training and education on an annual basis.

### **8.2 Level 1 Outcomes – Management Program Activities**

#### **8.2.1 Program Planning and Administration**

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

The City's implementation and assessment strategy for the education component is described in the *JURMP Section 10.0*. Figure 8.1 provides an overview of the major elements of this strategy as it was implemented during FY 2007-08.

#### **8.2.2 Management Program Implementation**

The Management Program Implementation element of the Annual Report addresses requirements, training, inspections, public awareness and response, and surveys and special investigations. Table 8.2 presents and describes targeted FY 2007-08 outcomes and results, as well as implementation targets for FY 2008-09.

### **8.3 Outcomes Targeted for Staff Implementing Control Measures**

#### **8.3.1 Outcome Level 2 – Knowledge and Awareness**

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

The City is required to implement an education program for each target community using all media as appropriate to (1) measurably increase the knowledge of the target communities regarding MS4s, impacts of urban runoff on receiving waters, and potential BMP solutions for the target audience; and (2) measurably change the behavior of target communities and thereby reduce pollutant releases to MS4s and the environment.

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

The *JURMP Section 10.0* defines requirements to educate each target community on the laws, regulations, permits, requirements, BMPs, general urban runoff concepts, and other topics where appropriate. BMPs applicable to these audiences were updated as part of the City's JURMP revision, submitted on March 24, 2008. FY 2007-08 changes included in that update are described in Table 8.2. BMP requirements were reviewed for necessary updates or modifications subsequent to the completion of FY 2007-08; additional modifications to the BMP requirements of this element were not determined to be necessary as a result of this review.

**8.3.3 Outcome Level 4 – Source Load Reductions**

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

Level 1 Outcomes (Management Program Activities)		Outcomes Targeted for Staff Implementing Control Measures		
		Outcome Level 2	Outcome Level 3	Outcome Level 4
<b>1.A. Program Planning and Administration</b>	<b>1.B. Management Program Implementation</b>	<b>Knowledge and Awareness</b>	<b>Behaviors and BMP Implementation</b>	<b>Source Load Reductions from Educational Activities</b>
<p><b>1. FY 2007-08 Program Updates</b></p> <ul style="list-style-type: none"> <li>▪ Modifications to JURMP</li> <li>▪ Updates to program documentation</li> <li>▪ Updates to training content &amp; materials</li> </ul> <p><b>2. FY 2008-09 Program Review and Update</b></p> <ul style="list-style-type: none"> <li>▪ Year-end program review</li> <li>▪ Updated source inventory</li> </ul>	<p><b>1. Jurisdictional Designation of Minimum BMPs</b></p> <p><b>2. Municipal Staff Training</b></p> <ul style="list-style-type: none"> <li>▪ Program Administration Staff</li> <li>▪ Program Implementation Staff</li> </ul> <p><b>3. Stormwater Hot Line Operation (619-424-4095)</b></p> <p><b>4. Surveys and Special Investigations</b></p> <p><i>Not targeted or assessed</i></p>	<p><b>A. Illicit Discharge Reporting</b></p> <p><b>B. Core Concepts</b></p> <p><i>Not targeted or assessed</i></p> <p><b>C. Implementation Responsibilities</b></p> <p><i>Not targeted or assessed</i></p>	<p><b>A. Municipal Departments and Personnel</b></p> <ul style="list-style-type: none"> <li>▪ BMP implementation</li> <li>▪ Illicit discharge control</li> </ul> <p><b>B. Construction Site Owners, Contractors, and Developers</b></p> <ul style="list-style-type: none"> <li>▪ BMP implementation</li> <li>▪ Illicit discharge control</li> </ul> <p><b>C. Industrial Site Owners and Operators</b></p> <ul style="list-style-type: none"> <li>▪ BMP implementation</li> <li>▪ Illicit discharge control</li> </ul> <p><b>D. Commercial Site Owners and Operators</b></p> <ul style="list-style-type: none"> <li>▪ BMP implementation</li> <li>▪ Illicit discharge control</li> </ul> <p><b>E. Residential Community, General Public, and School Children</b></p> <ul style="list-style-type: none"> <li>▪ BMP implementation</li> <li>▪ Illicit discharge control</li> </ul>	<p><i>Not targeted or assessed</i></p>

Figure 8.1 – FY 2007-08 Implementation and Assessment Strategy for the Education Component

**Table 8.1 – Overview of Education**

Category	Number	Description
<b>A. Type of Education</b>		
Municipal Departments and Personnel Training	---	
Construction Site Owners and Contractor Training	---	
Industrial Site Owners and Operators Workshops and Inspections	---	
Commercial Site Owners and Operators Workshops and Inspections	---	
Residential Community, General Public, and School Children Outreach	---	
<b>B. Educational Efforts</b>		
Municipal Employees Training Events	3	<p>Employees are trained on the use of BMPs in their daily operations. Events were held in conjunction with the filing of the Annual Report of the JURMP and for the JURMP prepared for the new Municipal Permit, R9-2007-0001. Face-to-face meetings are held on a regular basis with employees to discuss the JURMP and its application in their operations.</p> <p>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.</p> <p>Commercial Site Owners and Operators are trained through scheduled inspections by the Public Works Department Environmental Division, and through investigations of illegal discharges.</p> <p>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 Earth Day Fair at the Pier, the first event of its kind, in which over 300 school children and many of the local population participated. School children in Imperial Beach also participate in the Habitat Heroes program offered to 5th and 6th graders.</p>
Construction Site Owners, Contractors and Developer Training Events	114	
Industrial Site Owners and Operators Training Events	---	
Commercial Site Owners and Operators Training Events	55	
Residential Community Outreach Events	3	
General Public Outreach Events	1	
School Children Outreach Events	8	

**Table 8.1 – Overview of Education**

Category	Number	Description
JURMP Sections	Description of FY 2007-08 Changes	
10.0 and Appendix I		BMP requirements of the JURMP applicable to educational areas and activities were modified in accordance with the requirements of the updated Permit in March 2008.

**Table 8.2 – Targeted Outcomes and Results for the Education Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>LEVEL 1 OUTCOMES (MANAGEMENT PROGRAM ACTIVITIES)</b>				
<b>A. PROGRAM PLANNING AND ADMINISTRATION</b>				
<b>1. FY 2007-08 PROGRAM UPDATES</b>				
<b>A. MODIFICATIONS TO JURMP</b>				
Update applicable JURMP sections per new Permit requirements	Applicable JURMP sections updated 03-24-08	Completion	Applicable updates were included in <b>JURMP Section 10.0</b> , submitted to the RWQCB on 03-24-08.	Complete and identify FY 2008-09 JURMP modifications
<b>B. UPDATES TO PROGRAM DOCUMENTATION (POLICIES, PLANS, PROCEDURES, GUIDELINES, AND FORMS)</b>				
---	---	---	No program policies, plans, procedures, guidelines, or forms have yet been developed.	Update and/or develop educational efforts for consistency with program updates
<b>C. UPDATES TO TRAINING PROGRAM</b>				
---	---	---	<b>JURMP Section 10.0</b> establishes updated standards for training municipal staff. Since these standards will take effect during FY 2008-09, training content and materials will be updated accordingly.	Update staff training materials for consistency with updated standards of JURMP Section 10.0

**Table 8.2 – Targeted Outcomes and Results for the Education Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>2. FY 2008-09 PROGRAM REVIEW AND UPDATE</b>				
<b>A. YEAR-END PROGRAM REVIEW</b>				
Complete annual year-end program review	Review underway	In progress	An annual program review for this element is underway during the development of this JURMP Annual Report. JURMP modifications recommended or planned as a result of this review are presented herein.	Complete annual year-end program review
<b>B. UPDATED OUTREACH MATERIALS</b>				
Update outreach materials	Update and development of new underway	In progress	The City is updating and developing new outreach materials for each target community	Update outreach materials
<b>B. MANAGEMENT PROGRAM IMPLEMENTATION</b>				
<b>1. Jurisdictional Designation of Minimum BMPs</b>				
Require minimum BMPs	Requirements implemented	Completion	All components of the JURMP have the requirement to implement measures to reduce pollutants and runoff to the MEP.	Require minimum BMPs
<b>2. Municipal Staff Training</b>				
Provide training for FY 2007-08	Training provided	Completion	Continuing with FY 2008-09, training results for staff with responsibilities applicable to this element will be included as part of this annual report section.	Provide training to all staff with identified responsibilities
<b>3. Storm Water Hotline Operation</b>				
Operate a hotline to provide the public opportunities to report trash and debris in roadways.	Hotline operated throughout reporting period	Confirmation	A Storm Water Hotline (619-424-4095) was operated throughout FY 2007-08 to provide the public a means of reporting accumulated trash or debris in City-maintained roadways and the MS4. 38 reports of trash and debris were received during the reporting period.	Operate a hotline to provide the public opportunities to report trash and debris in the City.

**Table 8.2 – Targeted Outcomes and Results for the Education Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>4. Surveys and Special Investigations</b>				
Not targeted or assessed	---	---	Special investigations were not conducted in FY 2007-08, and are not routinely conducted as part of the implementation strategy for this program element. None are planned for FY 2008-09.	Not targeted
Not targeted or assessed	---	---	Surveys of staff knowledge were not conducted during FY 2007-08. Beginning in FY 2008-09, surveys will routinely be incorporated before and after training as a means of evaluating training success and of monitoring staff knowledge from year to year.	Survey staff to ascertain baseline levels of knowledge concerning basic principles and specific job responsibilities.
<b>LEVEL 2 OUTCOMES (KNOWLEDGE AND AWARENESS OF PROGRAM IMPLEMENTATION BY STAFF)</b>				
Not targeted or assessed	---	---	Starting in FY 2008-09, the City will begin incorporating testing before and after municipal staff training to evaluate the training success and to determine whether changes in knowledge are being retained over time. Anticipated content includes illicit discharge reporting responsibilities, core concepts (e.g., What is a watershed?), and specific job responsibilities.	Establish a baseline of staff knowledge regarding applicable program content
<b>LEVEL 3 OUTCOMES (BEHAVIORS AND BMP IMPLEMENTATION BY STAFF AND TARGETED AUDIENCES)</b>				
<b>A. MUNICIPAL DEPARTMENTS AND PERSONNEL</b>				
Not targeted or assessed	---	---	The City does not currently consider Level 3 assessment of education activities to be applicable or feasible.	Not targeted
<b>B. CONSTRUCTION SITE OWNERS AND DEVELOPERS</b>				
Not targeted or assessed	---	---	The City does not currently consider Level 3 assessment of education activities to be applicable or feasible.	Not targeted

**Table 8.2 – Targeted Outcomes and Results for the Education Component**

FY 2007-08 Results				FY 2008-09 Targeted Measurable Outcomes
Targeted Measurable Outcomes	Implementation Results	Assessment Results	Explanation	
<b>C. INDUSTRIAL SITE OWNERS AND OEPRATORS</b>				
Not targeted or assessed	---	---	The City does not currently consider Level 3 assessment of education activities to be applicable or feasible.	Not targeted
<b>D. COMMERCIAL SITE OWNERS AND OPERATORS</b>				
Not targeted or assessed	---	---	The City does not currently consider Level 3 assessment of education activities to be applicable or feasible.	Not targeted
<b>E. RESIDENTIAL COMMUNITY, GENERAL PUBLIC, AND SCHOOL CHILDREN</b>				
Not targeted or assessed	---	---	The City does not currently consider Level 3 assessment of education activities to be applicable or feasible.	Not targeted
<b>LEVEL 4 OUTCOMES (SOURCE LOAD REDUCTIONS FROM EDUCATIONAL ACTIVITIES)</b>				
Not targeted or assessed	---	---	The City does not currently consider Level 4 assessment of education activities to be applicable or feasible.	Not targeted

## **9.0 PUBLIC PARTICIPATION COMPONENT**

### **9.1 Introduction**

The City is required to incorporate a mechanism for Public Participation in the updating, development, and implementation of the JURMP.

### **9.2 Public Participation Efforts**

The public was allowed to participate in the development of the JURMP under the new Municipal Permit, and the City conducted a public hearing on March 19, 2008 prior to its approval. The public was also noticed on this annual report in the September 4, 2008 edition of the Imperial Beach *Eagle & Times* newspaper. Public hearing notices were posted at City Hall and the Imperial Beach Public Library. A draft of both the revised JURMP and this Annual Report was made available for public viewing at the Imperial Beach City Hall and was posted on the City's website.

Other mechanisms the City uses include the operation of a stormwater hotline to report violations, an e-mail address to report stormwater issues through the City's website, coordination of cleanup activities with local organizations, encouraging environmental groups, civic organizations, and other interested local groups to conduct trash cleanups, and stenciling of storm drains with messages such as "No Dumping, Flows to Ocean".

## **10.0 PROGRAM EFFECTIVENESS ASSESSMENT**

### **10.1 Introduction**

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

### **10.2 Level 1 Outcomes – Management Program Activities**

#### **10.2.1 Program Planning and Administration**

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

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

#### **10.2.2 Management Program Implementation**

Management Program Implementation addresses requirements, training, inspections, public awareness and response, and surveys and special investigations for each component of the JURMP within each element of this Annual Report. The tables in each section of the Annual Report present and describe targeted FY 2007-08 outcomes and results, as well as implementation targets for FY 2008-09 that are funded by the program.

### **10.3 Outcomes Targeted for Staff Implementing Control Measures**

#### **10.3.1 Outcome Level 2 – Knowledge and Awareness**

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

#### **10.3.2 Outcome Level 3 – Behaviors and Best Management Practice (BMP) Implementation**

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

#### **10.3.3 Outcome Level 4 – Source Load Reductions**

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

## **11.0 FISCAL ANALYSIS COMPONENT**

### **11.1 Introduction**

The Environmental Program Division of the Department of Public Works is responsible for the fiscal analysis of the program. Findings indicate the stormwater program costs are approximately \$1M. Revenue sources used by the City to fund the requirements of the Municipal Permit include City user fees on trash and sewer services, State appropriated funds, and Federal/State grant funds.

The City of Imperial Beach previously completed a financial review of its Jurisdictional Urban Runoff Management Program according to the requirements as specified under Regional Board Order No. 2001-001. This review found that the stormwater program costs were approximately \$1M. Revenue sources used by the City to fund the requirements outlined in the Municipal Stormwater Permit include:

- City user fee on trash service
- City user fee on sewer usage
- State appropriated funds
- Federal/State grant funds

The City expects costs of the stormwater program implementation to increase incrementally each year with inflation.