



Transportation and Stormwater Department
Stormwater Division

January 29, 2021

VIA EMAIL TO: SanDiego@waterboards.ca.gov

Mr. David Gibson, Executive Officer
San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92108

Subject: City of San Diego FY 20 JRMP Annual Report CW-255222 Smarts WDID
9000000510 Submittal of City of San Diego Fiscal Year 20 JRMP Annual Report,
Modified JRMP, and Modified Stormwater Standards Manual

Dear Mr. Gibson:

In accordance with MS4 Permit Provision F.3.b, the City of San Diego's Fiscal Year (FY) 20 Jurisdictional Runoff Management Plan (JRMP) Annual Report is being submitted as an appendix to the annual reports for the Water Quality Improvement Plans for which the City of San Diego (City) is a responsible agency. To comply with direction from San Diego Water Board staff, the City is also submitting the FY 20 JRMP Annual Report as a separate PDF file to facilitate SMARTS upload by San Diego Water Board staff.

Regional Clearinghouse Links

The FY 20 JRMP Annual Report, including watershed-specific data for each watershed in which the City is a responsible agency, can be viewed and files downloaded from the link shown below. The City JRMP and Stormwater Standards Manual have also been updated. The modified JRMP and Stormwater Standards Manual (Appendix VII of the JRMP) can also be viewed and downloaded at the link shown below.

<http://www.projectcleanwater.org/download/city-of-san-diego-fy-2020-jrmp/>

JRMP Modifications

The JRMP has been modified in 2020 in accordance with requirements listed in the Notice of Violation No. 2020-0025 (NOV), as well as to include a revised Stormwater Standards Manual as a replacement to Appendix VII of the JRMP. A summary of the revised Stormwater Standards Manual is presented later in this letter. The complete modified JRMP is attached to the FY 20 JRMP Annual Report. The following sections of JRMP Chapters 4 and 5 include modifications in response to items 1 and 3 required by the San Diego Water Board on page 2 of the NOV:

- Chapter 4 Development Planning: Added Section 4.3.2 Conditional Use Permits for Mining Operations
- Chapter 5 Construction – added text to following sections
 - Section 5.2.1 Construction and Grading Approval Process for Private Projects
 - Section 5.5 Site Inspection Process and Frequency
 - Section 5.6.1 Construction Site Enforcement – Private Development Projects
- WQIP/JRMP strategy CSD -JRMP-15 has been modified to comply with item 2 on page 2 of NOV. Revisions to this strategy are shown in Table 5-2 of the modified JRMP Chapter 5. The City has also included revisions to strategy CSD-JRMP 15 in the WQIP Strategy Tables included in the WQIP Annual Report for Los Penasquitos.

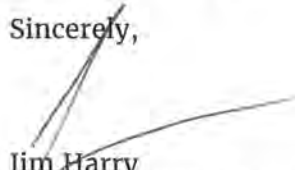
Stormwater Standards Manual Modifications

The City Storm Water Standards Manual (SWS) Part 1, the City's local best management practice (BMP) Design Manual, has been revised as directed in a letter from Erica Ryan of the San Diego Water Board dated October 31, 2020. The revised SWS Part 1 showing track changes is included as a replacement to Appendix VII of the modified JRMP and is attached to the FY 20 JRMP Annual Report. The revisions incorporate the San Diego Water Board's direction about project scenarios that are considered routine maintenance, as follows:

- Chapter 1: Revised the definitions of work that is considered routine maintenance and included a discussion of applicable construction BMP requirements as described in the October 31, 2020 letter. Also made changes to types of work considered exempt from requirements to match recent updates to the regional Model BMP Design Manual.
- Chapters 5 and 8: Made minor edits to clarify meaning
- No changes were made the appendices of SWS Part 1 or to SWS Part 2 or Part 3.

Should you have any questions, please contact Jim Harry, Senior Planner, at (619) 247-5661 or at jharry@sanidiego.gov. If you have any difficulty downloading the files from the Regional Clearinghouse, please contact <mailto:support@projectcleanwater.org>.

Sincerely,



Jim Harry
Senior Planner, Transportation and Stormwater Department

DK/jph

Enclosures: FY 20 JRMP Annual Report (with Attachments including modified City of San Diego JRMP)

cc: Erica Ryan, Water Resources Control Engineer, PIN 794843, San Diego Water Board
Helen Yu, Water Resources Control Engineer, PIN 794853, San Diego Water Board

Alley Berenter, Program Manager, Public Utilities Department
Corrine Neuffer, Deputy City Attorney
Alia Khouri, Deputy Chief Operating Officer
Kris McFadden, Director, Transportation and Stormwater Department
Brianna Menke, Stormwater Compliance Manager, Transportation and Stormwater
Department
Jim Harry, Senior Planner, Transportation and Stormwater Department
Eric Mosolgo, Senior Engineer, Transportation and Stormwater Department

I. COPERMITTEE INFORMATION	
Copermittee Name: City of San Diego (San Dieguito WMA)	
Copermittee Primary Contact Name: Drew Kleis, Deputy Director, Stormwater Division, Transportation & Stormwater Department	
Copermittee Primary Contact Information:	
Address: 9370 Chesapeake Drive, Suite 100	
City: San Diego	County: San Diego
State: CA	Zip: 92123
Telephone: 858-541-4320	Fax: 858-541-4350
Email: AKleis@sandiego.gov	
II. LEGAL AUTHORITY	
Has the Copermittee established adequate legal authority within its jurisdiction to control pollutant discharges into and from its MS4 that complies with Order No. R9-2013-0001?	YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
A Principal Executive Officer, Ranking Elected Official, or Duly Authorized Representative has certified that the Copermittee obtained and maintains adequate legal authority?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
III. JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM DOCUMENT UPDATE	
Was an update of the jurisdictional runoff management program document required or recommended by the San Diego Water Board?	YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
If YES to the question above, did the Copermittee update its jurisdictional runoff management program document and make it available on the Regional Clearinghouse?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
IV. ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM²	
Has the Copermittee implemented a program to actively detect and eliminate illicit discharges and connections to its MS4 that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public	102
Number of non-storm water discharges detected by Copermittee staff or contractors	21
Number of non-storm water discharges investigated by the Copermittee	123
Number of sources of non-storm water discharges identified	123
Number of non-storm water discharges eliminated	114
Number of sources of illicit discharges or connections identified	123
Number of illicit discharges or connections eliminated	114 ³
Number of enforcement actions issued	96 ³
Number of escalated enforcement actions issued	64
V. DEVELOPMENT PLANNING PROGRAM²	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Was an update to the BMP Design Manual required or recommended by the San Diego Water Board?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
If YES to the question above, did the Copermittee update its BMP Design Manual and make it available on the Regional Clearinghouse?	YES ⁴ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of proposed development projects in review	47 ⁵
Number of Priority Development Projects in review	9 ⁶
Number of Priority Development Projects approved	27 ⁷
Number of approved Priority Development Projects exempt from any BMP requirements	0
Number of approved Priority Development Projects allowed alternative compliance	0
Number of Priority Development Projects granted occupancy	33 ⁸
Number of completed Priority Development Projects in inventory	130 ⁹
Number of high priority Priority Development Project structural BMP inspections	1
Number of Priority Development Project structural BMP violations	10 ¹⁰
Number of enforcement actions issued	10 ¹¹
Number of escalated enforcement actions issued	0

VI. CONSTRUCTION MANAGEMENT PROGRAM²

Has the Copermittee implemented a construction management program that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

Number of construction sites in inventory	909
Number of active construction sites in inventory	314
Number of inactive construction sites in inventory	60
Number of construction sites closed/completed during reporting period	535
Number of construction site inspections	8,576
Number of construction site violations	1,129
Number of enforcement actions issued	999
Number of escalated enforcement actions issued	58

VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM²

Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001? YES^{1,12} ☒ NO ☐

	Municipal	Commercial	Industrial	Residential
Number of facilities or areas in inventory	43	192 ¹³	39	12 ¹⁴
Number of existing development inspections	25	140	32	0 ¹⁴
Number of follow-up inspections	0	5	2	0
Number of violations	0	40	12	57 ¹⁴
Number of enforcement actions issued	0	24	12	5 ¹⁴
Number of escalated enforcement actions issued	0	39	12	52

VIII. PUBLIC EDUCATION AND PARTICIPATION

Has the Copermittee implemented a public education program component that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

Has the Copermittee implemented a public participation program component that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

IX. FISCAL ANALYSIS

Has the Copermittee attached to this form a summary of its fiscal analysis that complies with Order No. R9-2013-0001? YES^{1,15} ☒ NO ☐

X. CERTIFICATION

I [☐ Principal Executive Officer ☐ Ranking Elected Official ☒ Duly Authorized Representative] certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.


Signature

Drew Kleis
Print Name

(858) 541-4320
Telephone Number

January 25, 2021
Date

Deputy Director
Title

AKleis@sandiego.gov
Email

¹ The City of San Diego approved an update to the Jurisdictional Runoff Management Plan (JRMP) in FY 16. The update of the JRMP was performed in compliance with Order No. R9-2013-0001. The JRMP has been modified in 2020 in accordance with requirements listed in the JRMP Update and Notice of Violation No. 2020-0025. The modified JRMP is included in the JRMP Annual Report FY 2020 appendix.

² See the JRMP Annual Report FY 2020 Appendix, Attachment 1 for a citywide summary of this data.

³ The number of enforcement actions issued does not equal the number of identified illicit discharges or connections because some discharge complaints in the last quarter of FY 2020 were still under investigation at the end of FY 2020.

⁴ The Storm Water Standards Manual was updated in October 2018.

⁵ The number of ongoing Standard and Priority Development Projects in review as of 6/30/20. The Development Services Department processes other types of permits, in addition to those included in the JRMP Annual Report, that are not subject to the requirements of the municipal permit.

⁶ The number of ongoing Priority Development Projects in review as of 6/30/20. Only a portion of the projects that the Development Services Department processes qualify as a priority development project.

⁷ The number of Priority Development Projects approved in FY 2020.

⁸ This number includes the City's Priority Development Projects that received final inspection in FY 2020 as well as certain Priority Development buildings and grading projects that did not require a Certificate of Occupancy, that were completed in FY 2020.

⁹ Represents the total number of completed Priority Development Projects in the City's inventory at the end of FY 2020. These projects include completed projects that were entered into the inventory in previous years.

¹⁰ The number of Priority Development Project structural BMP violations included Notices of Violation, Notices of Deficient Maintenance, and Administrative Citations that were issued to public and private entities within the City's jurisdiction in this watershed.

¹¹ The number of enforcement actions included Notices of Violation and Notices of Deficient Maintenance issued to public and private entities within the City's jurisdiction in this watershed.

¹² Each City (municipal) facility is to be inspected twice per year by staff of the department responsible for the facility, as described in the JRMP. This is higher than the MS4 Permit minimum inspection frequency standard, which requires each site to be inspected once per 5-year period and 20% of the overall existing development inventory (industrial, commercial, municipal, and residential) to be inspected each year.

¹³ The reported number of commercial businesses includes stationary, fixed facilities, such as gas stations or restaurants, located within the watershed management area. The City also has identified mobile businesses that may operate within its jurisdiction. Mobile business inspections are not required by the municipal permit, and mobile businesses are not reported as part of commercial inventory on the JRMP Annual Report form due to the lack of a related, stationary facility to inspect. Mobile businesses are mainly addressed through the City's education and IDDE programs. Inspections of mobile businesses are conducted on an as needed basis if a mobile business is identified as a source of illicit discharges.

¹⁴ Existing facilities for residential uses are characterized as Residential Management Areas (RMA), which could include hundreds of residences. When all of the residences in an RMA are inspected by City staff, they are only counted as one inspection. However, individual issues noted at each residence during an RMA inspection are counted as separate violations and/or enforcement actions. In the event that only a portion of the overall RMA is investigated (e.g., in response to a complaint), violations and enforcement actions may be recorded, but it is not counted as an RMA inspection. RMAs are required to be inspected once every five years. Zero inspections were conducted this year, as the rest of the inventory was inspected in prior years.

¹⁵ See the JRMP Annual Report FY 2020 Appendix for the FY 2020 Fiscal Analysis.

I. COPERMITTEE INFORMATION	
Copermittee Name: City of San Diego (Los Peñasquitos WMA)	
Copermittee Primary Contact Name: Drew Kleis, Deputy Director, Stormwater Division, Transportation & Stormwater Department	
Copermittee Primary Contact Information:	
Address: 9370 Chesapeake Drive, Suite 100	
City: San Diego	County: San Diego
State: CA	Zip: 92123
Telephone: 858-541-4320	Fax: 858-541-4350
Email: AKleis@sandiego.gov	
II. LEGAL AUTHORITY	
Has the Copermittee established adequate legal authority within its jurisdiction to control pollutant discharges into and from its MS4 that complies with Order No. R9-2013-0001?	YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
A Principal Executive Officer, Ranking Elected Official, or Duly Authorized Representative has certified that the Copermittee obtained and maintains adequate legal authority?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
III. JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM DOCUMENT UPDATE	
Was an update of the jurisdictional runoff management program document required or recommended by the San Diego Water Board?	YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
If YES to the question above, did the Copermittee update its jurisdictional runoff management program document and make it available on the Regional Clearinghouse?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
IV. ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM²	
Has the Copermittee implemented a program to actively detect and eliminate illicit discharges and connections to its MS4 that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public	382
Number of non-storm water discharges detected by Copermittee staff or contractors	126
Number of non-storm water discharges investigated by the Copermittee	508
Number of sources of non-storm water discharges identified	508
Number of non-storm water discharges eliminated	483
Number of sources of illicit discharges or connections identified	508
Number of illicit discharges or connections eliminated	483 ³
Number of enforcement actions issued	355 ³
Number of escalated enforcement actions issued	178
V. DEVELOPMENT PLANNING PROGRAM²	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Was an update to the BMP Design Manual required or recommended by the San Diego Water Board?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
If YES to the question above, did the Copermittee update its BMP Design Manual and make it available on the Regional Clearinghouse?	YES ⁴ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of proposed development projects in review	172 ⁵
Number of Priority Development Projects in review	34 ⁶
Number of Priority Development Projects approved	55 ⁷
Number of approved Priority Development Projects exempt from any BMP requirements	0
Number of approved Priority Development Projects allowed alternative compliance	0
Number of Priority Development Projects granted occupancy	50 ⁸
Number of completed Priority Development Projects in inventory	302 ⁹
Number of high priority Priority Development Project structural BMP inspections	15
Number of Priority Development Project structural BMP violations	14 ¹⁰
Number of enforcement actions issued	14 ¹¹
Number of escalated enforcement actions issued	0

VI. CONSTRUCTION MANAGEMENT PROGRAM²

Has the Copermittee implemented a construction management program that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

Number of construction sites in inventory	1,105
Number of active construction sites in inventory	517
Number of inactive construction sites in inventory	61
Number of construction sites closed/completed during reporting period	527
Number of construction site inspections	8,481
Number of construction site violations	604
Number of enforcement actions issued	385
Number of escalated enforcement actions issued	19

VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM²

Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001? YES^{1,12} ☒ NO ☐

	Municipal	Commercial	Industrial	Residential
Number of facilities or areas in inventory	134	1,178 ¹³	516	27 ¹⁴
Number of existing development inspections	124	719	253	0 ¹⁴
Number of follow-up inspections	0	19	9	0
Number of violations	4	157	32	166 ¹⁴
Number of enforcement actions issued	4	53	28	13 ¹⁴
Number of escalated enforcement actions issued	0	155	31	153

VIII. PUBLIC EDUCATION AND PARTICIPATION

Has the Copermittee implemented a public education program component that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

Has the Copermittee implemented a public participation program component that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

IX. FISCAL ANALYSIS

Has the Copermittee attached to this form a summary of its fiscal analysis that complies with Order No. R9-2013-0001? YES¹⁵ ☒ NO ☐

X. CERTIFICATION

I [☐ Principal Executive Officer ☐ Ranking Elected Official ☒ Duly Authorized Representative] certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.


Signature

Drew Kleis
Print Name

(858) 541-4320
Telephone Number

January 29, 2021
Date

Deputy Director
Title

AKleis@sandiego.gov
Email

¹ The City of San Diego approved an update to the Jurisdictional Runoff Management Plan (JRMP) in FY 16. The update of the JRMP was performed in compliance with Order No. R9-2013-0001. The JRMP has been modified in 2020 in accordance with requirements listed in the JRMP Update and Notice of Violation No. 2020-0025. The modified JRMP is included in the JRMP Annual Report FY 2020 appendix.

² See the JRMP Annual Report FY 2020 Appendix, Attachment 1 for a citywide summary of this data.

³ The number of enforcement actions issued does not equal the number of identified illicit discharges or connections because some discharge complaints in the last quarter of FY 2020 were still under investigation at the end of FY 2020.

⁴ The Storm Water Standards Manual was updated in October 2018.

⁵ The number of ongoing Standard and Priority Development Projects in review as of 6/30/20. The Development Services Department processes other types of permits, in addition to those included in the JRMP Annual Report, that are not subject to the requirements of the municipal permit.

⁶ The number of ongoing Priority Development Projects in review as of 6/30/20. Only a portion of the projects that the Development Services Department processes qualify as a priority development project.

⁷ The number of Priority Development Projects approved in FY 2020.

⁸ This number includes the City's Priority Development Projects that received final inspection in FY 2020 as well as certain Priority Development buildings and grading projects that did not require a Certificate of Occupancy, that were completed in FY 2020.

⁹ Represents the total number of completed Priority Development Projects in the City's inventory at the end of FY 2020. These projects include completed projects that were entered into the inventory in previous years.

¹⁰ The number of Priority Development Project structural BMP violations included Notices of Violation, Notices of Deficient Maintenance, and Administrative Citations that were issued to public and private entities within the City's jurisdiction in this watershed.

¹¹ The number of enforcement actions included Notices of Violation and Notices of Deficient Maintenance issued to public and private entities within the City's jurisdiction in this watershed.

¹² Each City (municipal) facility is to be inspected twice per year by staff of the department responsible for the facility, as described in the JRMP. This is higher than the MS4 Permit minimum inspection frequency standard, which requires each site to be inspected once per 5-year period and 20% of the overall existing development inventory (industrial, commercial, municipal, and residential) to be inspected each year.

¹³ The reported number of commercial businesses includes stationary, fixed facilities, such as gas stations or restaurants, located within the watershed management area. The City also has identified mobile businesses that may operate within its jurisdiction. Mobile business inspections are not required by the municipal permit, and mobile businesses are not reported as part of commercial inventory on the JRMP Annual Report form due to the lack of a related, stationary facility to inspect. Mobile businesses are mainly addressed through the City's education and IDDE programs. Inspections of mobile businesses are conducted on an as needed basis if a mobile business is identified as a source of illicit discharges.

¹⁴ Existing facilities for residential uses are characterized as Residential Management Areas (RMA), which could include hundreds of residences. When all of the residences in an RMA are inspected by City staff, they are only counted as one inspection. However, individual issues noted at each residence during an RMA inspection are counted as separate violations and/or enforcement actions. In the event that only a portion of the overall RMA is investigated (e.g., in response to a complaint), violations and enforcement actions may be recorded, but it is not counted as an RMA inspection. RMAs are required to be inspected once every five years. Zero inspections were conducted this year, as the rest of the inventory was inspected in prior years.

¹⁵ See the JRMP Annual Report FY 2020 Appendix for the FY 2020 Fiscal Analysis.

I. COPERMITTEE INFORMATION	
Copermittee Name: City of San Diego (Mission Bay/La Jolla WMA)	
Copermittee Primary Contact Name: Drew Kleis, Deputy Director, Stormwater Division, Transportation & Stormwater Department	
Copermittee Primary Contact Information:	
Address: 9370 Chesapeake Drive, Suite 100	
City: San Diego	County: San Diego
State: CA	Zip: 92123
Telephone: 858-541-4320	Fax: 858-541-4350
Email: AKleis@sandiego.gov	
II. LEGAL AUTHORITY	
Has the Copermittee established adequate legal authority within its jurisdiction to control pollutant discharges into and from its MS4 that complies with Order No. R9-2013-0001?	YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
A Principal Executive Officer, Ranking Elected Official, or Duly Authorized Representative has certified that the Copermittee obtained and maintains adequate legal authority?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
III. JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM DOCUMENT UPDATE	
Was an update of the jurisdictional runoff management program document required or recommended by the San Diego Water Board?	YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
If YES to the question above, did the Copermittee update its jurisdictional runoff management program document and make it available on the Regional Clearinghouse?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
IV. ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM²	
Has the Copermittee implemented a program to actively detect and eliminate illicit discharges and connections to its MS4 that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public	477
Number of non-storm water discharges detected by Copermittee staff or contractors	158
Number of non-storm water discharges investigated by the Copermittee	635
Number of sources of non-storm water discharges identified	635
Number of non-storm water discharges eliminated	613
Number of sources of illicit discharges or connections identified	636
Number of illicit discharges or connections eliminated	614 ³
Number of enforcement actions issued	433 ³
Number of escalated enforcement actions issued	261
V. DEVELOPMENT PLANNING PROGRAM²	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Was an update to the BMP Design Manual required or recommended by the San Diego Water Board?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
If YES to the question above, did the Copermittee update its BMP Design Manual and make it available on the Regional Clearinghouse?	YES ⁴ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of proposed development projects in review	313 ⁵
Number of Priority Development Projects in review	24 ⁶
Number of Priority Development Projects approved	30 ⁷
Number of approved Priority Development Projects exempt from any BMP requirements	0
Number of approved Priority Development Projects allowed alternative compliance	0
Number of Priority Development Projects granted occupancy	32 ⁸
Number of completed Priority Development Projects in inventory	189 ⁹
Number of high priority Priority Development Project structural BMP inspections	4
Number of Priority Development Project structural BMP violations	15 ¹⁰
Number of enforcement actions issued	15 ¹¹
Number of escalated enforcement actions issued	0

VI. CONSTRUCTION MANAGEMENT PROGRAM²

Has the Copermittee implemented a construction management program that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

Number of construction sites in inventory	2,102
Number of active construction sites in inventory	962
Number of inactive construction sites in inventory	212
Number of construction sites closed/completed during reporting period	928
Number of construction site inspections	13,436
Number of construction site violations	857
Number of enforcement actions issued	521
Number of escalated enforcement actions issued	35

VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM²

Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001? YES^{1,12} ☒ NO ☐

	Municipal	Commercial	Industrial	Residential
Number of facilities or areas in inventory	173	1,473 ¹³	207	32 ¹⁴
Number of existing development inspections	136	1,027	101	0 ¹⁴
Number of follow-up inspections	0	7	4	0
Number of violations	10	93	13	201 ¹⁴
Number of enforcement actions issued	10	29	11	15 ¹⁴
Number of escalated enforcement actions issued	0	88	13	186

VIII. PUBLIC EDUCATION AND PARTICIPATION

Has the Copermittee implemented a public education program component that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

Has the Copermittee implemented a public participation program component that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

IX. FISCAL ANALYSIS

Has the Copermittee attached to this form a summary of its fiscal analysis that complies with Order No. R9-2013-0001? YES^{1,15} ☒ NO ☐

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I [☐ Principal Executive Officer ☐ Ranking Elected Official ☒ Duly Authorized Representative] certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.


Signature

Drew Kleis
Print Name

(858) 541-4320
Telephone Number

January 25, 2021
Date

Deputy Director
Title

AKleis@sandiego.gov
Email

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¹⁰ The number of Priority Development Project structural BMP violations included Notices of Violation, Notices of Deficient Maintenance, and Administrative Citations that were issued to public and private entities within the City's jurisdiction in this watershed.

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¹² Each City (municipal) facility is to be inspected twice per year by staff of the department responsible for the facility, as described in the JRMP. This is higher than the MS4 Permit minimum inspection frequency standard, which requires each site to be inspected once per 5-year period and 20% of the overall existing development inventory (industrial, commercial, municipal, and residential) to be inspected each year.

¹³ The reported number of commercial businesses includes stationary, fixed facilities, such as gas stations or restaurants, located within the watershed management area. The City also has identified mobile businesses that may operate within its jurisdiction. Mobile business inspections are not required by the municipal permit, and mobile businesses are not reported as part of commercial inventory on the JRMP Annual Report form due to the lack of a related, stationary facility to inspect. Mobile businesses are mainly addressed through the City's education and IDDE programs. Inspections of mobile businesses are conducted on an as needed basis if a mobile business is identified as a source of illicit discharges.

¹⁴ Existing facilities for residential uses are characterized as Residential Management Areas (RMA), which could include hundreds of residences. When all of the residences in an RMA are inspected by City staff, they are only counted as one inspection. However, individual issues noted at each residence during an RMA inspection are counted as separate violations and/or enforcement actions. In the event that only a portion of the overall RMA is investigated (e.g., in response to a complaint), violations and enforcement actions may be recorded, but it is not counted as an RMA inspection. RMAs are required to be inspected once every five years. Zero inspections were conducted this year, as the rest of the inventory was inspected in prior years.

¹⁵ See the JRMP Annual Report FY 2020 Appendix for the FY 2020 Fiscal Analysis.

I. COPERMITTEE INFORMATION	
Copermittee Name: City of San Diego (San Diego River WMA)	
Copermittee Primary Contact Name: Drew Kleis, Deputy Director, Stormwater Division, Transportation & Stormwater Department	
Copermittee Primary Contact Information:	
Address: 9370 Chesapeake Drive, Suite 100	
City: San Diego	County: San Diego
State: CA	Zip: 92123
Telephone: 858-541-4320	Fax: 858-541-4350
Email: AKleis@sandiego.gov	
II. LEGAL AUTHORITY	
Has the Copermittee established adequate legal authority within its jurisdiction to control pollutant discharges into and from its MS4 that complies with Order No. R9-2013-0001?	YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
A Principal Executive Officer, Ranking Elected Official, or Duly Authorized Representative has certified that the Copermittee obtained and maintains adequate legal authority?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
III. JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM DOCUMENT UPDATE	
Was an update of the jurisdictional runoff management program document required or recommended by the San Diego Water Board?	YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
If YES to the question above, did the Copermittee update its jurisdictional runoff management program document and make it available on the Regional Clearinghouse?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
IV. ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM²	
Has the Copermittee implemented a program to actively detect and eliminate illicit discharges and connections to its MS4 that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public	528
Number of non-storm water discharges detected by Copermittee staff or contractors	176
Number of non-storm water discharges investigated by the Copermittee	702
Number of sources of non-storm water discharges identified	702
Number of non-storm water discharges eliminated	670
Number of sources of illicit discharges or connections identified	703
Number of illicit discharges or connections eliminated	671 ³
Number of enforcement actions issued	567 ³
Number of escalated enforcement actions issued	357
V. DEVELOPMENT PLANNING PROGRAM²	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Was an update to the BMP Design Manual required or recommended by the San Diego Water Board?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
If YES to the question above, did the Copermittee update its BMP Design Manual and make it available on the Regional Clearinghouse?	YES ⁴ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of proposed development projects in review	226 ⁵
Number of Priority Development Projects in review	38 ⁶
Number of Priority Development Projects approved	51 ⁷
Number of approved Priority Development Projects exempt from any BMP requirements	0
Number of approved Priority Development Projects allowed alternative compliance	0
Number of Priority Development Projects granted occupancy	41 ⁸
Number of completed Priority Development Projects in inventory	325 ⁹
Number of high priority Priority Development Project structural BMP inspections	6
Number of Priority Development Project structural BMP violations	11 ¹⁰
Number of enforcement actions issued	11 ¹¹
Number of escalated enforcement actions issued	0

VI. CONSTRUCTION MANAGEMENT PROGRAM²

Has the Copermittee implemented a construction management program that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

Number of construction sites in inventory	1,610
Number of active construction sites in inventory	667
Number of inactive construction sites in inventory	112
Number of construction sites closed/completed during reporting period	831
Number of construction site inspections	11,855
Number of construction site violations	888
Number of enforcement actions issued	564
Number of escalated enforcement actions issued	19

VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM²

Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001? YES^{1,12} ☒ NO ☐

	Municipal	Commercial	Industrial	Residential
Number of facilities or areas in inventory	136	1,539 ¹³	283	33 ¹⁴
Number of existing development inspections	126	850	110	0 ¹⁴
Number of follow-up inspections	0	16	8	0
Number of violations	22	115	38	247 ¹⁴
Number of enforcement actions issued	22	40	17	16 ¹⁴
Number of escalated enforcement actions issued	0	113	37	231

VIII. PUBLIC EDUCATION AND PARTICIPATION

Has the Copermittee implemented a public education program component that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

Has the Copermittee implemented a public participation program component that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

IX. FISCAL ANALYSIS

Has the Copermittee attached to this form a summary of its fiscal analysis that complies with Order No. R9-2013-0001? YES^{1,15} ☒ NO ☐

X. CERTIFICATION

I [☐ Principal Executive Officer ☐ Ranking Elected Official ☒ Duly Authorized Representative] certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.


Signature

Drew Kleis
Print Name

(858) 541-4320
Telephone Number

January 25, 2021
Date

Deputy Director
Title

AKleis@sandiego.gov
Email

¹ The City of San Diego approved an update to the Jurisdictional Runoff Management Plan (JRMP) in FY 16. The update of the JRMP was performed in compliance with Order No. R9-2013-0001. The JRMP has been modified in 2020 in accordance with requirements listed in the JRMP Update and Notice of Violation No. 2020-0025. The modified JRMP is included in the JRMP Annual Report FY 2020 appendix.

² See the JRMP Annual Report FY 2020 Appendix, Attachment 1 for a citywide summary of this data.

³ The number of enforcement actions issued does not equal the number of identified illicit discharges or connections because some discharge complaints in the last quarter of FY 2020 were still under investigation at the end of FY 2020.

⁴ The Storm Water Standards Manual was updated in October 2018.

⁵ The number of ongoing Standard and Priority Development Projects in review as of 6/30/20. The Development Services Department processes other types of permits, in addition to those included in the JRMP Annual Report, that are not subject to the requirements of the municipal permit.

⁶ The number of ongoing Priority Development Projects in review as of 6/30/20. Only a portion of the projects that the Development Services Department processes qualify as a priority development project.

⁷ The number of Priority Development Projects approved in FY 2020.

⁸ This number includes the City's Priority Development Projects that received final inspection in FY 2020 as well as certain Priority Development buildings and grading projects that did not require a Certificate of Occupancy, that were completed in FY 2020.

⁹ Represents the total number of completed Priority Development Projects in the City's inventory at the end of FY 2020. These projects include completed projects that were entered into the inventory in previous years.

¹⁰ The number of Priority Development Project structural BMP violations included Notices of Violation, Notices of Deficient Maintenance, and Administrative Citations that were issued to public and private entities within the City's jurisdiction in this watershed.

¹¹ The number of enforcement actions included Notices of Violation and Notices of Deficient Maintenance issued to public and private entities within the City's jurisdiction in this watershed.

¹² Each City (municipal) facility is to be inspected twice per year by staff of the department responsible for the facility, as described in the JRMP. This is higher than the MS4 Permit minimum inspection frequency standard, which requires each site to be inspected once per 5-year period and 20% of the overall existing development inventory (industrial, commercial, municipal, and residential) to be inspected each year.

¹³ The reported number of commercial businesses includes stationary, fixed facilities, such as gas stations or restaurants, located within the watershed management area. The City also has identified mobile businesses that may operate within its jurisdiction. Mobile business inspections are not required by the municipal permit, and mobile businesses are not reported as part of commercial inventory on the JRMP Annual Report form due to the lack of a related, stationary facility to inspect. Mobile businesses are mainly addressed through the City's education and IDDE programs. Inspections of mobile businesses are conducted on an as needed basis if a mobile business is identified as a source of illicit discharges.

¹⁴ Existing facilities for residential uses are characterized as Residential Management Areas (RMA), which could include hundreds of residences. When all of the residences in an RMA are inspected by City staff, they are only counted as one inspection. However, individual issues noted at each residence during an RMA inspection are counted as separate violations and/or enforcement actions. In the event that only a portion of the overall RMA is investigated (e.g., in response to a complaint), violations and enforcement actions may be recorded, but it is not counted as an RMA inspection. RMAs are required to be inspected once every five years. Zero inspections were conducted this year, as the rest of the inventory was inspected in prior years.

¹⁵ See the JRMP Annual Report FY 2020 Appendix for the FY 2020 Fiscal Analysis.

I. COPERMITTEE INFORMATION	
Copermittee Name: City of San Diego (San Diego Bay WMA)	
Copermittee Primary Contact Name: Drew Kleis, Deputy Director, Stormwater Division, Transportation & Stormwater Department	
Copermittee Primary Contact Information:	
Address: 9370 Chesapeake Drive, Suite 100	
City: San Diego	County: San Diego
State: CA	Zip: 92123
Telephone: 858-541-4320	Fax: 858-541-4350
Email: AKleis@sandiego.gov	
II. LEGAL AUTHORITY	
Has the Copermittee established adequate legal authority within its jurisdiction to control pollutant discharges into and from its MS4 that complies with Order No. R9-2013-0001?	YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
A Principal Executive Officer, Ranking Elected Official, or Duly Authorized Representative has certified that the Copermittee obtained and maintains adequate legal authority?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
III. JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM DOCUMENT UPDATE	
Was an update of the jurisdictional runoff management program document required or recommended by the San Diego Water Board?	YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
If YES to the question above, did the Copermittee update its jurisdictional runoff management program document and make it available on the Regional Clearinghouse?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
IV. ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM²	
Has the Copermittee implemented a program to actively detect and eliminate illicit discharges and connections to its MS4 that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public	719
Number of non-storm water discharges detected by Copermittee staff or contractors	161
Number of non-storm water discharges investigated by the Copermittee	880
Number of sources of non-storm water discharges identified	880
Number of non-storm water discharges eliminated	836
Number of sources of illicit discharges or connections identified	880
Number of illicit discharges or connections eliminated	836 ³
Number of enforcement actions issued	614 ³
Number of escalated enforcement actions issued	315
V. DEVELOPMENT PLANNING PROGRAM²	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Was an update to the BMP Design Manual required or recommended by the San Diego Water Board?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
If YES to the question above, did the Copermittee update its BMP Design Manual and make it available on the Regional Clearinghouse?	YES ⁴ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of proposed development projects in review	502 ⁵
Number of Priority Development Projects in review	49 ⁶
Number of Priority Development Projects approved	39 ⁷
Number of approved Priority Development Projects exempt from any BMP requirements	0
Number of approved Priority Development Projects allowed alternative compliance	0
Number of Priority Development Projects granted occupancy	37 ⁸
Number of completed Priority Development Projects in inventory	83 ⁹
Number of high priority Priority Development Project structural BMP inspections	0
Number of Priority Development Project structural BMP violations	2 ¹⁰
Number of enforcement actions issued	2 ¹¹
Number of escalated enforcement actions issued	0

VI. CONSTRUCTION MANAGEMENT PROGRAM²

Has the Copermittee implemented a construction management program that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

Number of construction sites in inventory	2,425
Number of active construction sites in inventory	1,154
Number of inactive construction sites in inventory	187
Number of construction sites closed/completed during reporting period	1,084
Number of construction site inspections	15,707
Number of construction site violations	1,122
Number of enforcement actions issued	420
Number of escalated enforcement actions issued	54

VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM²

Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001? YES^{1,12} ☒ NO ☐

	Municipal	Commercial	Industrial	Residential
Number of facilities or areas in inventory	201	3,339 ¹³	390	70 ¹⁴
Number of existing development inspections	184	2,033	168	0 ¹⁴
Number of follow-up inspections	0	19	2	0
Number of violations	39	173	20	502 ¹⁴
Number of enforcement actions issued	39	49	4	37 ¹⁴
Number of escalated enforcement actions issued	0	162	20	465

VIII. PUBLIC EDUCATION AND PARTICIPATION

Has the Copermittee implemented a public education program component that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

Has the Copermittee implemented a public participation program component that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

IX. FISCAL ANALYSIS

Has the Copermittee attached to this form a summary of its fiscal analysis that complies with Order No. R9-2013-0001? YES^{1, 15} ☒ NO ☐

X. CERTIFICATION

I [☐ Principal Executive Officer ☐ Ranking Elected Official ☒ Duly Authorized Representative] certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.


Signature

Drew Kleis
Print Name

(858) 541-4320
Telephone Number

January 25, 2021
Date

Deputy Director
Title

AKleis@sandiego.gov
Email

¹ The City of San Diego approved an update to the Jurisdictional Runoff Management Plan (JRMP) in FY 16. The update of the JRMP was performed in compliance with Order No. R9-2013-0001. The JRMP has been modified in 2020 in accordance with requirements listed in the JRMP Update and Notice of Violation No. 2020-0025. The modified JRMP is included in the JRMP Annual Report FY 2020 appendix.

² See the JRMP Annual Report FY 2020 Appendix, Attachment 1 for a citywide summary of this data.

³ The number of enforcement actions issued does not equal the number of identified illicit discharges or connections because some discharge complaints in the last quarter of FY 2020 were still under investigation at the end of FY 2020.

⁴ The Storm Water Standards Manual was updated in October 2018.

⁵ The number of ongoing Standard and Priority Development Projects in review as of 6/30/19. The Development Services Department processes other types of permits, in addition to those included in the JRMP Annual Report, that are not subject to the requirements of the municipal permit.

⁶ The number of ongoing Priority Development Projects in review as of 6/30/19. Only a portion of the projects that the Development Services Department processes qualify as a priority development project.

⁷ The number of Priority Development Projects approved in FY 2020.

⁸ This number includes the City's Priority Development Projects that received final inspection in FY 2020 as well as certain Priority Development buildings and grading projects that did not require a Certificate of Occupancy, that were completed in FY 2020.

⁹ Represents the total number of completed Priority Development Projects in the City's inventory at the end of FY 2020. These projects include completed projects that were entered into the inventory in previous years.

¹⁰ The number of Priority Development Project structural BMP violations included Notices of Violation, Notices of Deficient Maintenance, and Administrative Citations that were issued to public and private entities within the City's jurisdiction in this watershed.

¹¹ The number of enforcement actions included Notices of Violation and Notices of Deficient Maintenance issued to public and private entities within the City's jurisdiction in this watershed.

¹² Each City (municipal) facility is to be inspected twice per year by staff of the department responsible for the facility, as described in the JRMP. This is higher than the MS4 Permit minimum inspection frequency standard, which requires each site to be inspected once per 5-year period and 20% of the overall existing development inventory (industrial, commercial, municipal, and residential) to be inspected each year.

¹³ The reported number of commercial businesses includes stationary, fixed facilities, such as gas stations or restaurants, located within the watershed management area. The City also has identified mobile businesses that may operate within its jurisdiction. Mobile business inspections are not required by the municipal permit, and mobile businesses are not reported as part of commercial inventory on the JRMP Annual Report form due to the lack of a related, stationary facility to inspect. Mobile businesses are mainly addressed through the City's education and IDDE programs. Inspections of mobile businesses are conducted on an as needed basis if a mobile business is identified as a source of illicit discharges.

¹⁴ Existing facilities for residential uses are characterized as Residential Management Areas (RMA), which could include hundreds of residences. When all of the residences in an RMA are inspected by City staff, they are only counted as one inspection. However, individual issues noted at each residence during an RMA inspection are counted as separate violations and/or enforcement actions. In the event that only a portion of the overall RMA is investigated (e.g., in response to a complaint), violations and enforcement actions may be recorded, but it is not counted as an RMA inspection. RMAs are required to be inspected once every five years. Zero inspections were conducted this year, as the rest of the inventory was inspected in prior years.

¹⁵ See the JRMP Annual Report FY 2020 Appendix for the FY 2020 Fiscal Analysis.

I. COPERMITTEE INFORMATION	
Copermittee Name: City of San Diego (Tijuana WMA)	
Copermittee Primary Contact Name: Drew Kleis, Deputy Director, Stormwater Division, Transportation & Stormwater Department	
Copermittee Primary Contact Information:	
Address: 9370 Chesapeake Drive, Suite 100	
City: San Diego	County: San Diego
State: CA	Zip: 92123
Telephone: 858-541-4320	Fax: 858-541-4350
Email: AKleis@sandiego.gov	
II. LEGAL AUTHORITY	
Has the Copermittee established adequate legal authority within its jurisdiction to control pollutant discharges into and from its MS4 that complies with Order No. R9-2013-0001?	YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
A Principal Executive Officer, Ranking Elected Official, or Duly Authorized Representative has certified that the Copermittee obtained and maintains adequate legal authority?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
III. JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM DOCUMENT UPDATE	
Was an update of the jurisdictional runoff management program document required or recommended by the San Diego Water Board?	YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
If YES to the question above, did the Copermittee update its jurisdictional runoff management program document and make it available on the Regional Clearinghouse?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
IV. ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM²	
Has the Copermittee implemented a program to actively detect and eliminate illicit discharges and connections to its MS4 that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public	37
Number of non-storm water discharges detected by Copermittee staff or contractors	21
Number of non-storm water discharges investigated by the Copermittee	58
Number of sources of non-storm water discharges identified	58
Number of non-storm water discharges eliminated	44
Number of sources of illicit discharges or connections identified	58
Number of illicit discharges or connections eliminated	44 ³
Number of enforcement actions issued	42 ³
Number of escalated enforcement actions issued	28
V. DEVELOPMENT PLANNING PROGRAM²	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Was an update to the BMP Design Manual required or recommended by the San Diego Water Board?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
If YES to the question above, did the Copermittee update its BMP Design Manual and make it available on the Regional Clearinghouse?	YES ⁴ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of proposed development projects in review	44 ⁵
Number of Priority Development Projects in review	17 ⁶
Number of Priority Development Projects approved	24 ⁷
Number of approved Priority Development Projects exempt from any BMP requirements	0
Number of approved Priority Development Projects allowed alternative compliance	0
Number of Priority Development Projects granted occupancy	21 ⁸
Number of completed Priority Development Projects in inventory	108 ⁹
Number of high priority Priority Development Project structural BMP inspections	2
Number of Priority Development Project structural BMP violations	12 ¹⁰
Number of enforcement actions issued	12 ¹¹
Number of escalated enforcement actions issued	0

VI. CONSTRUCTION MANAGEMENT PROGRAM²

Has the Copermittee implemented a construction management program that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

Number of construction sites in inventory	231
Number of active construction sites in inventory	90
Number of inactive construction sites in inventory	3
Number of construction sites closed/completed during reporting period	138
Number of construction site inspections	1,958
Number of construction site violations	205
Number of enforcement actions issued	72
Number of escalated enforcement actions issued	6

VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM²

Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001? YES^{1,12} ☒ NO ☐

	Municipal	Commercial	Industrial	Residential
Number of facilities or areas in inventory	25	287 ¹³	218	6 ¹⁴
Number of existing development inspections	19	181	111	0 ¹⁴
Number of follow-up inspections	0	0	2	0
Number of violations	7	6	3	21 ¹⁴
Number of enforcement actions issued	7	2	2	5 ¹⁴
Number of escalated enforcement actions issued	0	6	3	16

VIII. PUBLIC EDUCATION AND PARTICIPATION

Has the Copermittee implemented a public education program component that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

Has the Copermittee implemented a public participation program component that complies with Order No. R9-2013-0001? YES¹ ☒ NO ☐

IX. FISCAL ANALYSIS

Has the Copermittee attached to this form a summary of its fiscal analysis that complies with Order No. R9-2013-0001? YES^{1,15} ☒ NO ☐

X. CERTIFICATION

I [☐ Principal Executive Officer ☐ Ranking Elected Official ☒ Duly Authorized Representative] certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.


Signature

Drew Kleis
Print Name

(858) 541-4320
Telephone Number

January 25, 2021
Date

Deputy Director
Title

AKleis@sandiego.gov
Email

¹ The City of San Diego approved an update to the Jurisdictional Runoff Management Plan (JRMP) in FY 16. The update of the JRMP was performed in compliance with Order No. R9-2013-0001. The JRMP has been modified in 2020 in accordance with requirements listed in the JRMP Update and Notice of Violation No. 2020-0025. The modified JRMP is included in the JRMP Annual Report FY 2020 appendix.

² See the JRMP Annual Report FY 2020 Appendix, Attachment 1 for a citywide summary of this data.

³ The number of enforcement actions issued does not equal the number of identified illicit discharges or connections because some discharge complaints in the last quarter of FY 2020 were still under investigation at the end of FY 2020.

⁴ The Storm Water Standards Manual was updated in October 2018.

⁵ The number of ongoing Standard and Priority Development Projects in review as of 6/30/20. The Development Services Department processes other types of permits, in addition to those included in the JRMP Annual Report, that are not subject to the requirements of the municipal permit.

⁶ The number of ongoing Priority Development Projects in review as of 6/30/20. Only a portion of the projects that the Development Services Department processes qualify as a priority development project.

⁷ The number of Priority Development Projects approved in FY 2020.

⁸ This number includes the City's Priority Development Projects that received final inspection in FY 2020 as well as certain Priority Development buildings and grading projects that did not require a Certificate of Occupancy, that were completed in FY 2020.

⁹ Represents the total number of completed Priority Development Projects in the City's inventory at the end of FY 2020. These projects include completed projects that were entered into the inventory in previous years.

¹⁰ The number of Priority Development Project structural BMP violations included Notices of Violation, Notices of Deficient Maintenance, and Administrative Citations that were issued to public and private entities within the City's jurisdiction in this watershed.

¹¹ The number of enforcement actions included Notices of Violation and Notices of Deficient Maintenance issued to public and private entities within the City's jurisdiction in this watershed.

¹² Each City (municipal) facility is to be inspected twice per year by staff of the department responsible for the facility, as described in the JRMP. This is higher than the MS4 Permit minimum inspection frequency standard, which requires each site to be inspected once per 5-year period and 20% of the overall existing development inventory (industrial, commercial, municipal, and residential) to be inspected each year.

¹³ The reported number of commercial businesses includes stationary, fixed facilities, such as gas stations or restaurants, located within the watershed management area. The City also has identified mobile businesses that may operate within its jurisdiction. Mobile business inspections are not required by the municipal permit, and mobile businesses are not reported as part of commercial inventory on the JRMP Annual Report form due to the lack of a related, stationary facility to inspect. Mobile businesses are mainly addressed through the City's education and IDDE programs. Inspections of mobile businesses are conducted on an as needed basis if a mobile business is identified as a source of illicit discharges.

¹⁴ Existing facilities for residential uses are characterized as Residential Management Areas (RMA), which could include hundreds of residences. When all of the residences in an RMA are inspected by City staff, they are only counted as one inspection. However, individual issues noted at each residence during an RMA inspection are counted as separate violations and/or enforcement actions. In the event that only a portion of the overall RMA is investigated (e.g., in response to a complaint), violations and enforcement actions may be recorded, but it is not counted as an RMA inspection. RMAs are required to be inspected once every five years. Zero inspections were conducted this year, as the rest of the inventory was inspected in prior years.

¹⁵ See the JRMP Annual Report FY 2020 Appendix for the FY 2020 Fiscal Analysis.

Development Services Department

Engineering Division

Jan 22, 2021

Ms. Laurie Walsh
Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92108

Subject: City of San Diego Jurisdictional Runoff Management Plan (JRMP) FY 2020 Annual Report, Development Services Department Engineering Division Contributions

Dear Ms. Walsh:

Please accept this letter as certification of the City of San Diego Development Services Department Engineering Division's contributions to the City of San Diego's JRMP Fiscal Year 2020 Annual Report and associated Appendices.

If you have any questions, please contact Sean Torres, Senior Civil Engineer, at (619) 446-5442.

I certify under penalty of law that this Jurisdictional Runoff Management Plan Fiscal Year 2020 Annual Report and attachments (associated with the Development Services Department, Engineering Division) were prepared under my direction or supervision in accordance with a system designed to assure 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, to the best of my knowledge and belief, is 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.

Sincerely,



George Ghossain
Interim Deputy Director, Development Services Department

GG/st

cc: Elyse Lowe, Director, Development Services Department
Gary Geiler, Assistant Director, Development Services Department
Drew Kleis, Deputy Director, Transportation & Storm Water Department
Sean Torres, Senior Civil Engineer, Development Services Department



Development Services Department
Building Construction & Safety Division

January 8, 2021

Laurie Walsh
San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92108

Dear Ms. Walsh:

Subject: City of San Diego Jurisdictional Runoff Management Plan (JRMP) FY 2020 Annual Report, Development Services Department Inspection Services Division Contributions

Please accept this letter as certification of the City of San Diego Development Services Department Inspection Services Division's contributions to the City of San Diego's JRMP Fiscal Year 2020 Annual Report, and associated Appendices.

If you have any questions, please contact Jeff Tamares, Senior Civil Engineer at (858) 627-2020.

I certify, under penalty of law, that this Jurisdictional Runoff Management Plan Fiscal Year 2020 Annual Report and attachments (associated with the Development Services Department, Inspection Services Division) were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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 known violations.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Scherer". The signature is fluid and cursive, with a large initial "D" and "S".

Dan Scherer
Assistant Deputy Director
Development Services Department



Engineering & Capital Projects

January 13, 2021

Laurie Walsh
San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92108

Reference/Subject: City of San Diego Jurisdictional Runoff Management Plan (JRMP) FY 2020 Annual Report, Engineering and Capital Projects Department, Contracts Division Contributions on Public Design Projects

Dear Ms. Walsh:

Please accept this letter as certification of the City of San Diego Engineering and Capital Projects Department, Contracts Division's contributions to the City of San Diego's JRMP Fiscal Year 2020 Annual Report, and associated Appendices regarding public projects in design phase in Fiscal Year 2020.

If you have any questions, please contact Catherine Dungca, Senior Civil Engineer, at 619- 533-3778.

I certify, under penalty of law, that this Jurisdictional Runoff Management Plan Fiscal Year 2020 Annual Report and attachments (associated with the Engineering and Capital Projects Department, Contracts Division) were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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 known violations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Myrna'.

Myrna Dayton, PE, QSD, QSP
Assistant Director
Engineering and Capital Projects Department

Crd

Attachments



525 B Street, Suite 700, MS908A
San Diego, CA 92101
engineering@sandiego.gov

sandiego.gov

Cc: Mark Nassar, Deputy Director, Engineering and Capital Projects Department
Cindy Crocker, Interim Deputy Director, Engineering and Capital Projects Department
Carrie Purcell, Assistant Deputy Director, Engineering and Capital Projects Department
Catherine Dungca, Senior Civil Engineer, Engineering and Capital Projects Department

Engineering & Capital Projects

Construction Management & Field Engineering

January 15, 2021

Laurie Walsh
San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92108

Dear Ms. Walsh:

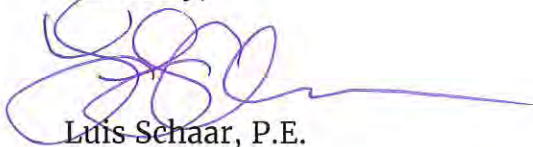
Subject: City of San Diego Jurisdictional Runoff Management Plan (JRMP) FY 2020
Annual Report, Engineering & Capital Projects Department, Construction
Management & Field Engineering Division Contributions

Please accept this letter as certification of the City of San Diego Engineering & Capital Projects Department Construction Management & Field Engineering Division's contributions to the City of San Diego's JRMP Fiscal Year 2020 Annual Report, and associated Appendices.

If you have any questions, please contact Harry Nguyen, Senior Civil Engineer, at (858) 573-5012.

I certify under penalty of law that this Jurisdictional Runoff Management Plan Fiscal Year 2020 Annual Report and attachments (associated with the Engineering & Capital Projects Department Construction Management & Field Engineering Division) were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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, to the best of my knowledge and belief, is 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.

Sincerely,



Luis Schaar, P.E.
Deputy Director
E&CP Department – CM&FE Division

APPENDIX

1 OPERATIONAL ADAPTIVE MANAGEMENT

The following are operational adaptive management improvements that the City made during Fiscal Year (FY) 2020:

- **Los Peñasquitos Watershed Master Plan**

The City leads water quality improvement efforts, primarily by reducing pollutants in urban runoff and storm water to the maximum extent practicable. One such effort is the **City's development of Watershed Master Plans (WMP), which are a supplement to the** data collected in the Watershed Asset Management Plan (WAMP). The Los Peñasquitos Watershed Master Plan (Los Peñasquitos WMP) identifies projects and activities that the City and its partners will implement to improve drainage, water quality, lagoon restoration, and habitat mitigation in the watershed as funding becomes available.

The goal of the Los Peñasquitos WMP is to provide a comprehensive plan for protecting, enhancing, and sustaining the quality of water resources in the Los Peñasquitos Watershed Management Area (WMA). Implementing the WMP will improve flood protection, improve water quality, conserve water resources, and preserve natural habitats and recreational areas.

Using information from recent plans and studies, as well as from new data collection and analysis efforts, the Los Peñasquitos WMP identifies issues in the watershed, describes modeling scenarios and their results, considers the implications of climate change on the watershed, plan and projects, and lists the prioritized capital improvement projects (CIP) identified for implementation.

- **Chollas Watershed Master Plan and Stream Restoration Opportunities**

Development of the Chollas Watershed Master Plan (CWMP) was a multi-year effort. The CWMP identifies, prioritizes, and optimizes the water quality, flood control, and stream restoration opportunities within the Chollas Creek Watershed. To achieve that goal, LIDAR data was used to delineate the drainage basins for each inlet of the conveyance network. Using the localized drainage information, optimal locations of green infrastructure and multi-use treatment area opportunities were identified to address the issues of water quality and flood control. Additionally, the CWMP determined the areas of stream restoration that would enhance the outcomes of the structural projects.

- **Reconciling the Watershed Asset Management Plan**

The Watershed Asset Management Plan (WAMP) was developed after the original adoption of the current MS4 Permit in order to guide the operation and maintenance of **the City's large portfolio of storm water assets. The effort to modernize the WAMP** continued in FY 2020. To help calibrate the WAMP, and increase its utility, activities and costs associated with operation and maintenance activities of individual assets were studied. These investigations are leading to a more accurate and efficient WAMP, which will allow the city to more accurately predict life cycle costs and make highly-informed decisions regarding the management of its assets.

2 STORM WATER PROGRAM ACCOMPLISHMENTS/NOTABLE UPDATES

The City continued to implement the key elements of the JRMP. The following are storm water accomplishments and notable updates that occurred during the FY 2020 reporting period.

- **Water Quality Improvement Plans**

In FY 2020 the City continued to implement the Water Quality Improvement Plans (WQIPs) that included City jurisdiction. The goal of the WQIPs is to protect, preserve, enhance, and restore the water quality of receiving water bodies. These WQIPs identify the adaptive planning and management process necessary to address the highest priority water quality conditions within a watershed. The WQIPs also identify strategies to **achieve improvements in the quality of discharges from the Responsible Agencies' storm drain systems**. The City is the lead on the WQIP for the San Dieguito, Los Peñasquitos, and Mission Bay watersheds. The City is also a participating agency in the San Diego River, San Diego Bay, and Tijuana River watersheds.

- **JRMP**

In FY 2020, the City made administrative changes to the JRMP. The modified JRMP is attached to this report. The modified JRMP can also be viewed at <https://www.sandiego.gov/stormwater/plansreports/jrmp> as well as on the Project Clean Water website, which is the regional clearinghouse for information required by the Municipal Permit. A summary of the JRMP modifications made in 2020 is provided below.

- Modifications to JRMP regarding permit processing for Mining Facilities

The JRMP has been modified in 2020 in accordance with requirements listed in the JRMP Update and Notice of Violation No. 2020-0025 (NOV). The following sections of JRMP Chapters 4 and 5 include proposed modifications in response to items 1 and 3 required by the Water Board on page 2 of the NOV:

- Chapter 4 Development Planning: Added Section 4.3.2 Conditional Use Permits for Mining Operations
- Chapter 5 Construction – added text to following sections
 - Section 5.2.1 Construction and Grading Approval Process for Private Projects
 - Section 5.5 Site Inspection Process and Frequency
 - Section 5.6.1 Construction Site Enforcement – Private Development Projects
- WQIP/JRMP strategy CSD -JRMP-15 to comply with item 2 on page 2 of NOV. Revisions to this strategy are shown in Table 5-2 of the revised JRMP Chapter 5. The City has also included revisions to strategy CSD -JRMP 15 to the WQIP Strategy Tables included in the WQIP Annual Reports.

The following is a summary of the corrective actions made in response to the NOV. Specific language documenting the City commitment to these corrective actions has been added to Sections 4 and 5 of the JRMP as well as Strategy CSD -JRMP 15 of the Los Peñasquitos WQIP:

VIOLATION #1	CORRECTIVE ACTION
<p>Failure to implement its legal authority and enforce compliance with local statutes, ordinances, permits, orders and similar means on the MCCP-3Roots project.</p>	<ul style="list-style-type: none"> • Training provided to DSD and Planning staff in December 2020 so they understand that the Reclamation Plan approved under the CUP cannot be implemented until the developer obtains a grading permit. Any violation of this requirement is to be reported immediately to Code Enforcement. • For future CUP's issued for mining projects, reviewers will impose conditions to specifically state that a Grading Permit will be required in order to implement the Reclamation Plan, and that SWPPP coverage under CGP will be required prior to grading activities. The City has implemented this on the Stone Creek CUP project currently in review. • Mining operator is required to submit annual reports to the State about the status of the mining operations. The City's SMARA lead also gets a copy of this report and when mining operations have ceased, will now direct the operator to obtain a Grading Permit to implement the Reclamation Plan.
VIOLATION #2	CORRECTIVE ACTION
<p>Failure to require MCCP-3Roots to obtain coverage under the CGP prior to ground disturbance activities.</p>	<ul style="list-style-type: none"> • Provided training to reviewers and inspectors in December 2020 to differentiate coverage under IGP vs CGP, especially as it relates to mining operations. • See training provided under corrective actions for Violation #1. As part of the grading permit approval process, coverage under the CGP will be required.
VIOLATION #3	CORRECTIVE ACTION
<p>Failure to identify the MCCP-3Roots site as a high threat to downstream surface water quality in its Construction Management Program.</p>	<ul style="list-style-type: none"> • See training provided under corrective actions for Violation #1. As part of the grading permit approval process, projects will be tagged with the appropriate construction inspection frequency according to the site location.

VIOLATION #4	CORRECTIVE ACTION
Failure to require implementation of BMPs to reduce discharges of pollutants in storm water from the MCCP-3Roots site to the maximum extent practicable (MEP).	Beginning January 2021 <ul style="list-style-type: none"> Current practice is to conduct one SMARA inspection per year. The City will increase inspection frequency of BMPs for SMARA projects to quarterly during dry seasons and monthly during wet seasons in order to help ensure effective BMPs are in place.

- Modification to Section 7.3.6 of the JRMP regarding BMP inspections at outdoor firing ranges:

The City received a Notice of Violation from the County Department of Health in 2020 regarding lead levels in outfalls at a City facility. The City worked with the County to address the NOV. The following commitment (shown in red text) regarding inspection of BMPs at outdoor firing ranges has been added to the JRMP to document the inspection commitments made by the City response to the NOV.

31	Implement a pollution prevention system for uncovered outdoor sources of pollutants.	<p><u>Minimum Municipal BMP:</u></p> <p>A system to remind employees or contractors to complete required maintenance shall be provided for trash areas without overhead coverage, uncovered outdoor work areas, and other outdoor areas of the site that require frequent maintenance to mitigate pollution potential. SDMC §43.0307(a).</p> <p><u>Police Department BMP Implementation:</u></p> <p>The system used by the Police Department may include signs posted in work areas or in break areas, maintenance logs completed by employees, or email reminders sent to responsible employees or contractors whenever maintenance needs to be done, as appropriate to the specific area or activity.</p> <p>The Police Department will inspect and maintain BMPs installed at outdoor firing ranges. The BMP's including swales with mulch and gravel bases, screens on inlets, and straw wattles around parking areas have been installed at the facility on 4008 Federal Boulevard to prevent release of soil to onsite storm drains. The BMPs at these facilities will be inspected annually to ensure that they are functioning properly.</p>
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- Modification to JRMP Appendix IIA regarding Municipal Facilities Inspections:

Appendix IIA of the JRMP includes a list of municipal facilities that are inspected by the City. Modifications to Appendix IIA include clarification regarding what

department conducts inspections at certain facilities and addition of a footnote. The following footnote was added to clarify that the inspection status of certain facilities may change annually and that the latest information on facilities inspections is available through contacting the Transportation and Stormwater

Department: *“The inventory presented in this appendix of municipal facilities to be inspected by the City as part of the industrial and commercial inspections program is based on the best information available at the time this table was prepared. Inspections completed by the City only cover areas that have active industrial/commercial operations occurring on site. As program implementation progresses, modifications to the municipal facilities inventory will be made based on any changes to active industrial/commercial activities that occur to municipal facilities. For the most updated information, please **contact the City’s Transportation & Stormwater Department.**”*

- o Modification to Section 6.4.1 of the JRMP regarding inspections at Areas of Biological Significance (ASBS)

The following clarification (shown in red text) regarding City inspections at the Scripps/La Jolla ASBS has been made to Section 6.4.1 of the JRMP:

” In accordance with the City’s Final Compliance Plan for the La Jolla Area of Special Biological Significance (ASBS), the City will perform higher numbers of inspections at facilities that fall within the ASBS drainage area. Commercial areas will receive two inspections annually, both of which will occur during the rainy season.” ~~once prior to, and once during, the rainy season.”~~

This modification to the inspection frequency for commercial areas within the ASBS drainage area, will ensure language in the JRMP is consistent with the requirements set forth in the MS4 Permit and the ASBS Compliance Plan. City staff will continue to inspect commercial facilities within the ASBS drainage area twice during the rainy season to ensure the ASBS Compliance Plan is properly implemented. In addition, inspecting commercial facilities during the rainy season will ensure City staff are identifying and addressing BMP deficiencies when their threats to water quality are the highest.

- **Storm Water Standards Manual Modification**

The City made changes to Appendix VII of the JRMP, the Storm Water Standards Manual (SWS), as directed in a letter from Erica Ryan of the San Diego Water Board dated October 31, 2020. Revisions clarify types of project work that is considered routine maintenance. **Changes were only made to SWS Part 1, the City’s local BMP Design Manual.** While these changes occurred outside the FY 2020 reporting period, the revised SWS is attached to the FY 2020 JRMP Annual Report as directed in the October 31, 2020 letter.

The modified main body of SWS Part 1 is attached to this report. All appendices to SWS Part 1 and the entirety of SWS Parts 2 and 3 are not included in the attachment because **they were not changed. They are the same as the version currently available on the City’s website at**

<https://www.sandiego.gov/planning/programs/landdevcode/landdevmanual#SWstandards2018>.

A summary of the modifications to SWS Part 1 is provided below.

- Chapter 1
 - Added a new section, 1.3.1, to reflect direction provided in the San Diego **Water Board's October 31, 2020** letter.
 - Added a discussion of required construction BMPs per the October 31, 2020 letter in new Section 1.3.1.1.
 - Modified other discussions of exempt activities to be consistent with the most recent update to the regional Model BMP Design Manual, which had been updated based on direction from the San Diego Water Board.
 - Modified surrounding text in Chapter 1 as necessary for consistency with the added text.
 - Modified the list of WQIP highest priority water quality conditions to include nutrients for the portion of the San Dieguito WMA that is above Lake Hodges, consistent with the proposed update the San Dieguito WQIP.
- Chapters 5
 - Modified text in Section 5.5.4 about use of flow thru BMPs with alternative compliance for clarity.
- Chapter 8
 - Modified text in Section 8.2.4.1 to make the discussion of the required **maintenance agreement more specific to the City's process**

- **COVID-19 Compliance Relief**

In a May 2020 letter from the San Diego Water Board, the San Diego Water Board **presented an evaluation of the City's request for relief from Municipal Permit compliance** requirements in accordance with the recently issued State Water Resources Control Board guidance regarding permit compliance obligations in light of COVID-19. The San **Diego Water Board approved the City's request to use BMP maintenance verification** forms to verify medium and low priority structural BMP maintenance. In the May 2020 letter, the San Diego Water Board noted that, pursuant to provision F.3.b of the Order, the City is expected to report any instances where verification forms are used in lieu of in-person inspections to verify structural BMP maintenance, in the 2019/2020 Annual JRMP Report due January 31, 2021. In FY 20, the City inspection inventory included 288 structural BMP sites (20% of the total Structural BMP Inventory). A total of 142 inspections of these structural BMP sites were completed in FY 20 using verification forms in lieu of in-person inspections.

- **General Plan and Community Plan Amendments**

Mission Valley Community Plan

- Lead Staff: Nancy Graham
- Date started: Summer 2015
- Adoption date: September 10, 2019
- Key storm water issue addressed by the plan: Flooding associated with the San Diego River

- Recommendations for improvements that include storm water: Finding opportunities and funding for the capture of storm water for reuse and infiltration into the groundwater system. Proactively managing flood risk via supporting roadway extensions such as Fenton Parkway and Via Las Cumbres to provide high-water crossing during flooding events, street design, and best management practices,

Number of meeting or outreach that specifically address storm water related issue and summary of issues addressed: No meetings on storm water were conducted in fiscal year 2020.

- Policies that address storm water:
 - Provide for sustainable street designs, including storm water infiltration measures that reduce stormwater runoff and flooding.
 - Seek out grant funding to support the design and construction of infrastructure, including roads and pedestrian bridges, to allow safe means of travel should low level crossings and other parts of Mission Valley flood.
 - Implement applicable requirements of the Environmentally Sensitive Lands regulations, Biology Guidelines, and the MSCP Subarea Plan for preservation, mitigation, acquisition, restoration, and management and monitoring of biological resources to provide areas for natural retention and filtration of water to better manage flooding.
 - Follow and implement flood mitigation strategies outlined in the City of San Diego Flood Mitigation Plan and the Land Development Code.
 - Consider the need and potential for a flood control facility to store and control the release of water into the San Diego River and its tributaries.
 - Support the continual maintenance of dams upstream by dredging to decrease the potential for property damage and loss of life from flooding and to avoid the need for further engineered channels, channel improvements, and other flood control facilities.
 - Seek out grant funding to support the design and construction of infrastructure, including roads and pedestrian bridges, to allow safe means of travel should low level crossings and other parts of Mission Valley flood.
 - Encourage all stormwater and urban run-off drainage into resource-based parks or open space lands be filtered or treated before entering the area. Design surface parking lots to incorporate trees for shading and permeable surfaces to minimize stormwater runoff.
 - Ensure the design of new development integrates storm water best management practices on site to maximize their effectiveness by:

- Allowing the use of green roofs and water collection devices, such as bio swales, cisterns, and rain barrels, to capture rainwater from the building for re-use.
- Utilizing disconnected drain sprouts to interrupt the direct flow of rain-water from the buildings to the storm water system. Integrate these features to imbibe buildings with a distinctive architectural character.
- Minimizing on site impermeable surfaces, such as concrete and asphalt. Utilizing permeable pavers, porous asphalt, reinforced grass pavement, cobble stone block pavement, etc. to detain and infiltrate runoff on-site.
- Encouraging the use of permeable paving elements in auto and non-auto-oriented areas.
- Further, through design guidelines, the plan supports Green Streets and the management of stormwater through swales, bioretention curb extensions, sidewalk planters, permeable pavement, sidewalk trees, tree boxes, and alternative street design.

Kearny Mesa Plan Update

- Lead Staff: Lisa Lind
- Date started: Summer 2016
- Adoption or anticipated adoption date: Fall 2020
- Key storm water issue addressed by the plan:

A report for hydrology and water quality issues in Kearny Mesa was submitted to the consultant for revisions based on City comments and finalized for inclusion in the Draft EIR.

- Recommendations for improvements that include storm water: The Community Review Draft of the Kearny Mesa Community Plan was released for comment. The Community Plan recommends best practices to enhance the quality of experiences for those spending time in Kearny Mesa. The Community Plan envisions a pedestrian-oriented public realm for employees commuting via transit to work; for customers walking to destinations along the Convoy Corridor; and for residents jogging and walking in the community. The planned network of wider sidewalks designed with noncontiguous sidewalks, consistent with the Street Design Manual, can incorporate features such as tree plantings, pervious pavements, and storm water capture. These street enhancements provide shade and water quality benefits.

- Number of meeting or outreach that specifically address storm water related issue and summary of issues addresses: No meetings on storm water were conducted in fiscal year 2020.
- Policies that address storm water: Provide for sustainable street designs, including storm water retention measures that reduce storm water runoff and flooding; Incorporate bioswales or other Low Impact Design (LID) design practices where there are sufficient public rights-of-way and within building setbacks and between building facades throughout the community. As multiuse treatment areas, swales reduce storm water volume, improve water quality, and reduce flow velocity; and Provide for green street designs, including storm water infiltration measures, that reduce storm water runoff, peak flows, and flooding.

Clairemont Community Plan Update

- Lead Staff: Marlon Pangilinan
- Date started: Spring 2017
- Adoption or anticipated adoption date: Summer 2021
- Key storm water issue addressed by the plan: Flooding associated with canyon and hillside runoff
- Recommendations for improvements that include storm water: The Community Plan will envision a pedestrian-oriented public realm. The planned network of wider sidewalks designed with noncontiguous sidewalks, consistent with the Street Design Manual, can incorporate features such as tree plantings, pervious pavements, and storm water capture. These street enhancements provide shade and water quality benefits.
- Number of meeting or outreach that specifically address storm water related issue and summary of issues addresses: None conducted Fiscal Year 2020
- Policies that address storm water: Policies will be drafted to provide for sustainable street designs, including storm water retention measures that reduce storm water runoff and flooding; Incorporate bioswales or other Low Impact Design (LID) design practices where there are sufficient public rights-of-way and within building setbacks and between building facades throughout the community. As multiuse treatment areas, swales reduce storm water volume, improve water quality, and reduce flow velocity; and Provide for green street designs, including storm water infiltration measures, that reduce storm water runoff, peak flows, and flooding

Mira Mesa Community Plan Update

- Lead Staff: Alex Frost
- Date started: Spring 2018
- Adoption or anticipated adoption date: Spring 2022
- Key storm water issue addressed by the plan: Flooding associated with canyon and hillside runoff.
- Recommendations for improvements that include storm water: The Community Plan will envision a pedestrian-oriented public realm. The planned network of wider sidewalks designed with noncontiguous sidewalks, consistent with the Street Design Manual, can incorporate features such as tree plantings, pervious pavements, and storm water capture. These street enhancements provide shade and water quality benefits.
- Number of meeting or outreach that specifically address storm water related issue and summary of issues addresses: None conducted Fiscal Year 2020
- Policies that address storm water: Policies will be drafted to provide for sustainable street designs, including storm water retention measures that reduce storm water runoff and flooding; Incorporate bioswales or other Low Impact Design (LID) design practices where there are sufficient public rights-of-way and within building setbacks and between building facades throughout the community. As multiuse treatment areas, swales reduce storm water volume, improve water quality, and reduce flow velocity, and Provide for green street designs, including storm water infiltration measures, that reduce storm water runoff, peak flows, and flooding

University Community Plan Update

- Lead Staff: Katie Witherspoon
- Date started: Spring 2018
- Adoption or anticipated adoption date: Spring 2022
- Key storm water issue addressed by the plan: To be determined.
- Recommendations for improvements that include storm water: The Community Plan will envision a pedestrian-oriented public realm. The planned network of wider sidewalks designed with noncontiguous sidewalks, consistent with the Street Design Manual, can incorporate features such as tree plantings, pervious pavements, and storm water capture. These street enhancements provide shade and water quality benefits.

- Number of meeting or outreach that specifically address storm water related issue and summary of issues addresses: None conducted Fiscal Year 2020
- Policies that address storm water: Policies will be drafted to provide for sustainable street designs, including storm water retention measures that reduce storm water runoff and flooding; Incorporate bioswales or other Low Impact Design (LID) design practices where there are sufficient public rights-of-way and within building setbacks and between building facades throughout the community. As multiuse treatment areas, swales reduce storm water volume, improve water quality, and reduce flow velocity; and Provide for green street designs, including storm water infiltration measures, that reduce storm water runoff, peak flows, and flooding

College Area Community Plan Update

- Lead Staff: Nathen Causman
- Date started: Spring 2020
- Adoption or anticipated adoption date: Spring 2023
- Key storm water issue addressed by the plan: Flooding associated with canyon and hillside runoff.
- Recommendations for improvements that include storm water: The Community Plan will envision a pedestrian-oriented public realm. The planned network of wider sidewalks designed with noncontiguous sidewalks, consistent with the Street Design Manual, can incorporate features such as tree plantings, pervious pavements, and storm water capture. These street enhancements provide shade and water quality benefits.
- Number of meeting or outreach that specifically address storm water related issue and summary of issues addresses: None conducted Fiscal Year 2020
- Policies that address storm water: Policies will be drafted to provide for sustainable street designs, including storm water retention measures that reduce storm water runoff and flooding; Incorporate bioswales or other Low Impact Design (LID) design practices where there are sufficient public rights-of-way and within building setbacks and between building facades throughout the community. As multiuse treatment areas, swales reduce storm water volume, improve water quality, and reduce flow velocity; and Provide for green street designs, including storm water infiltration measures, that reduce storm water runoff, peak flows, and flooding

- [Community Plan Activities: Special Studies, Transit Oriented Development Plans, and Specific Plans](#)

Balboa Avenue Station Area Specific Plan

- Lead Staff: Michael Prinz
- Date started: September 2015
- Adoption date: September 10, 2019
- Key storm water issue addressed by the plan: Urban runoff capture and storm water quality related to Rose Creek.
- Recommendations for improvements that include storm water: Green street improvements to Mission Bay Drive, Garnet Avenue and Grand Avenue.
- Amount spent on storm water related plan tasks, issues, recommendations, policies and/or outreach during the Fiscal Year: \$100 (estimate staff time)
- Number of meeting or outreach that specifically address storm water related issue and summary of issues addresses: No meetings.
- Policies that address storm water:
 - Encourage the incorporation of LID practices into building design and site plans that work with the natural hydrology of a site to reduce urban runoff, including the design or retrofit of existing landscaped or impervious areas to better capture storm water runoff.
 - Encourage the incorporation of and maintenance of storm water best management practices in public infrastructure and private development projects, including streetscape improvements to limit water pollution, erosion, and sedimentation.
 - Encourage the prioritization of LID practices that encourage water infiltration to minimize reliance on storm drains that could be impaired by sea level rise.

Morena Corridor Specific Plan

- Lead Staff: Michael Prinz
- Date started: February 2015
- Adoption date: September 10, 2019
- Key storm water issue addressed by the plan: Urban runoff capture and storm water quality related to Tecolote Creek.
- Recommendations for improvements that include storm water: See below for policies that address improvements within the Morena Corridor.

- Number of meeting or outreach that specifically address storm water related issue and summary of issues addresses: No meetings.
- Policies that address storm water:
 - Use permeable ground surfaces in public spaces to the extent possible and install materials that allow access in all weather conditions.
 - Incorporate permeable paving to reduce storm water runoff and absorption of rainwater.
 - Incorporate bio-filtration and bio-retention measures in parking lot design, edges of paved areas, and other landscaped areas to capture storm water runoff.
 - Create green streets that provide “urban greening” features that enhance the pedestrian and bicycle environment, storm water management features, and opportunities for additional street trees.
 - Integrate storm water and urban runoff capture and treatment facilities into landscaping and parking areas.
 - Minimize on-site impermeable surfaces, such as concrete and asphalt.
 - Utilize permeable paving materials such as permeable pavers, porous asphalt, reinforced grass pavement (turf-crete), cobblestone block pavement, etc. to allow storm water and urban runoff infiltration.
 - Incorporate Low Impact Development practices into building design and site plans that work with the natural hydrology of a site to reduce urban runoff, including the design or retrofit of existing landscaped or impervious areas to better capture storm water runoff.
 - Incorporate and maintain storm water best management practices in public infrastructure and private development projects, including streetscape improvements to limit water pollution, erosion, and sedimentation.
 - Prioritize Low Impact Development practices that encourage water infiltration to minimize reliance on storm drains that could be impaired by sea level rise.

Mission Boulevard Public Space and Active Transportation Study

- Lead Staff: Michael Prinz

- Date started: October 2016
- Adoption or anticipated adoption date: Not applicable. This grant-funded planning study will not be adopted by City Council. Grant final deliverable to be completed by September 4, 2019.
- Key storm water issue addressed by the plan: Curb and gutter improvement concepts to address accessibility along Mission Boulevard.
- Recommendations for improvements that include storm water: The study includes improvements to Mission Boulevard between Pacific Beach Drive and Diamond Street. Improvements to retrofit storm water inlets to address accessibility at applicable intersections will be included. Cost estimates of the proposed improvements will be included in the final report.
 - Policies that address storm water: The following recommendation will be incorporated:
 - Encourage incorporating enhanced storm water management as part of proposed improvements within the public right-of-way. These may include curb inserts, paver filter strips, bulb-out infiltration zones, linear detention basins and infiltrating tree wells.

De Anza Revitalization Plan/MB Plan Amendment

- Lead Staff: Scott Sandel
- Date started: November 2015
- Adoption or anticipated adoption date: Amendment to the Mission Bay Park Master Plan, tentative estimate 2020
- Key storm water issue addressed by the plan: Storm water quality related to Mission Bay and Rose Creek
- Recommendations for improvements that include storm water: The project will be consistent with the recommendations for improving water quality located in Mission Bay Park Master Plan Section VI *Water Quality* (P.85-88).

- Policies that address storm water: Storm water quality policies are included in the Mission Bay Park Master Plan, Environmental Section. However, two Guiding Principles, identified by the community to assist the planning process are identified below:
 - Identify uses, activities, and site design (location) that improve the existing water quality and natural resource system within and around De Anza.
 - Design alternatives that embrace responsibility and stewardship over the environment, incorporating wetlands enhancement, restoration, and safeguards of adjacent natural habitats.

Parks Master Plan

- Lead Staff: Scott Sandel
- Date started: Fall 2017
- Adoption or anticipated adoption date: Fall 2020
- Key storm water issue addressed by the plan: Urban runoff capture and storm water quality policies for parks.
- Recommendations for improvements that include storm water: This policy document will not contain specific project recommendations.
- Number of meeting or outreach that specifically address storm water related issue and summary of issues addresses: None in Fiscal Year 2020.
- Policies that address storm water: (Draft policies subject to change).
- Design parks that are financially and environmentally sustainable to help manage storm water runoff, clean air, and provide relief from urban heat.
- Partner with other City departments such as Transportation Storm Water to design future green infrastructure co-benefit projects that manage stormwater resources and provide recreational opportunities.
- Increase the City's overall tree canopy where appropriate in the developed regional and community parks and open space parks to provide air quality benefits and manage stormwater runoff.
- Incorporate storm water management best practices into park design standards by designing or retrofitting existing landscaped or impervious areas to better capture storm water runoff and limit water pollution, erosion, and sedimentation.

- Prioritize Low Impact Development practices that encourage water infiltration to minimize reliance on storm drains that could be impaired by sea level rise.

Fiesta Island Amendment to the Mission Bay Park Master Plan and LCP

- Lead Staff: Sara Osborn
- Date started: 2005
- Adoption date: June 17, 2019
- Key storm water issue addressed by the plan: Run off into Mission Bay
- Recommendations for improvements that include storm water: Reengineer the perimeter road to slope inward to prevent run off
- Number of meetings or outreach that specifically address storm water related issue and summary of issues addresses: None in Fiscal Year 2020.
- Policies that address storm water:
 - A loop road is to be constructed for Fiesta Island that would run clockwise around the perimeter of the island.
 - Fiesta Island should be regraded to drain inward, away from the water and into a bioswale to improve water quality and lessen beach erosion.
- **Notices of Violation**
- NOV R9-2010-0135 and Time Schedule Order (TSO) No. R9-2014-0034:
In 2010, the San Diego Regional Water Quality Control Board (San Diego Water Board) Regional Board issued NOV No. R9-2010-0135 to the City of San Diego for failure to take measures to reduce the discharge of pollutants to the maximum extent practicable (MEP), failure to implement its Standard Urban Stormwater Mitigation Plan (SUSMP), and failure to verify correct installation of permanent post-construction structural BMP requirements. The NOV and subsequent TSO identified 163 private and public development sites that had either missing or ineffective structural BMPs. In FY 2017, the **City achieved full compliance with the Regional Board's NOV (TSO R9-2014-0034)**. The Regional Board acknowledged the TSO had been resolved via communication sent to the City on 9/6/2017, and the Board updated the California Integrated Water Quality System (CIWQS) project database to reflect this.

Beginning in FY 2014, as part of its continuing inspections of completed structural BMPs, the City discovered an additional 74 sites which initially appeared to be out of compliance due to a variety of circumstances. The City is currently performing enforcement on each of the projects identified to be non-compliant. Established escalating enforcement procedures previously outlined to the Board are being followed to achieve compliance. Compliance will be achieved by demonstrating adherence to the

requirements of the MS4 permit in effect at the time of each particular project's approval. To date, 57 of the 74 sites which were identified as non-compliant, have been brought into compliance. The City has sent Civil Penalty Notices (CPN) to all of the property owners in violation of the MS4 Permit related to the sites identified. All open violations are expected to be resolved or **referred to the City Attorney's Office before July 2021.**

The 17 remaining cases will be issued a Civil Penalty Notice-Final Reminder letter which gives property owners a final 30 days to achieve compliance. These letters will be sent out in January 2021. Once the deadline passes, non-compliant properties will be issued a Hearing Notice beginning on March 15, 2021.

Construction Management Program Administrative Civil Liability Complaint (ACL): **The San Diego Water Board conducted an audit of the City's** construction management program during the 2014-2015 rainy season and issued an Administrative Civil Liability Complaint in July 2016 for several alleged violations **involving the City's construction**-related storm water best management practices (BMPs) oversight and enforcement. The City has worked diligently to address the initial concerns and will continue to evaluate and implement strategies to ensure long-term program improvements.

A settlement agreement for the ACL between the City and the San Diego Water Board was accepted on August 9, 2017. As a part of the settlement agreement the City agreed to return to the San Diego Water Board to provide an update on its construction storm water management efforts, and the status of the supplemental environmental projects. On August 12, 2018 the directors from the City Transportation and Storm Water Department, Public Utilities Department and the Development Services Department presented the update to the San Diego Water Board. A summary of the information presented by the City at the update as well as follow up actions completed by the City is presented below:

- An update on Part 2 of the Storm Water Standards Manual was done to increase the clarity of the language relating to the BMP performance expectations for the public and the overall enforceability for City staff. This update was finalized and officially adopted on October 1st, 2018. Prior to official adoption of the update by the City, the City held an industry training to make developers and other members of the public aware of the changes.
- Additionally, the City increased its personnel dedicated to implementing storm water regulations by 52 percent and continues to conduct training for all City staff that are involved with implementing storm water regulations. The City has held multi-department wet season trainings led by specialty storm water staff from the Engineering and Capital Projects, Development Services, and Transportation and Storm Water Departments. These trainings focused on inspection procedures, required application of BMPs, and updates to the Construction Storm Water Standards.
- Another example of interdepartmental coordination completed by the City is the continuation of bi-weekly, construction coordination meetings with the storm water staff from the Engineering and Capital Projects, Development Services, and Transportation and Storm Water Departments. These meetings continue to be a platform to effectively share up-to-date project information, discuss enforcement

strategies, collaborate on solutions, and coordinate on escalated enforcement actions for specific project sites.

- The City has also made significant progress on its Supplemental Environmental Projects required as a part of the settlement agreement. One of the four projects was completed in FY18, one was completed in FY20, and the final two are expected to be complete in FY21.

3 FISCAL ANALYSIS

3.1 GENERAL BUDGET INFORMATION

The Storm Water Division is responsible for reporting annually on the jurisdictional, watershed and regional expenditures to the Regional Board in accordance with the requirements in Regional Board Order No. R9-2013-0001 (as amended by Order Nos. R9-2015-0001 and R9-2015-0100) (2013 Permit). During the reporting period, the Storm Water Division collected and analyzed financial data **from 23 City departments/divisions through its “Annual Report Form”** questionnaire, as well as data provided by the Storm Water Division. A summary of the findings is included below.

3.2 FISCAL ANALYSIS METHODS

While the City used the format and guidelines included in the Fiscal Analysis Method for reporting purposes, a few modifications were necessary to address how the City tracks accounts internally. Modifications to the expenditure categories are described in the relevant sections below. In many cases, estimated percentages were used to allocate expenditures into the appropriate municipal permit component categories, including watershed and regional.

3.2.1 Fiscal Analysis Results

3.2.1.1 Expenditures

The City’s FY 2020 JRMP Regional Program total expenditures for implementing the Municipal Permit requirements are summarized in Table 1.

Table 1: FY 2020 Jurisdictional, Watershed, and Regional Expenditures Summary

Jurisdictional Component	
Administration	\$9,714,065
Development Planning (including public and private projects)	\$2,086,672
Construction (including public and private projects)	\$1,895,854
Municipal (including Non-Emergency Fire Fighting expenditures)	\$32,647,590
Storm Water Division Capital Improvements Program (CIP)	\$38,048,195
Industrial and Commercial	\$572,711
Residential, Education, and Public Participation	\$4,776,308
Illicit Discharge Detection and Elimination (IDDE)	\$9,100,867
Jurisdictional Total	\$98,842,262
Watershed Component ¹	
San Dieguito Watershed	(\$2,864,049)
Los Peñasquitos Watershed	(\$2,034,941)
Mission Bay Watershed	(\$2,039,065)
San Diego River Watershed	(\$2,632,354)
San Diego Bay Watershed	(\$4,496,455)
Tijuana River Watershed	(\$1,578,231)
Watershed Total	(15,645,095)
Regional Component	
Total Copermittee Cost Share for the City of San Diego	\$33,250
Additional Regional Costs for education efforts, monitoring, document reviews, regional meeting attendance, and special projects	\$26,895
Regional Total	\$60,145
Total Costs	\$98,902,407

JRMP Expenditures

The City's FY 2020 Citywide expenditures for implementing the jurisdictional Municipal Permit requirements are depicted in Figure 1. Expenditures were provided as actual costs in most cases, and when the actual costs could not be determined, estimates of actual costs were provided. The Storm Water Division used the expenditure categories detailed in the Fiscal Analysis Method for jurisdictional reporting. **However, because of implementation overlap with the City's education, public participation, and residential Municipal Permit components, it is difficult to separate out individual component costs. Therefore, the expenditures for residential, education, and public participation are reported as one expenditure category.**

A total of \$98,842,262 was expended in FY 2020 to implement JRMP activities citywide. This amount includes costs paid by sewer and water rate payers (which are used for sewer and water-related services) and costs reimbursed by project applicants. An overview of the expenditures reflected in this component is described below.

Administration (\$9,714,065)

Activities identified in this section represent personnel and non-personnel expenses for administration and contracts, grant management, citywide management, staff training, reporting, and assessment of the Municipal Permit.

Development Planning (\$2,086,672)

Activities identified in this section represent personnel and non-personnel expenses for plan check reviews, incorporating BMPs into project designs, BMP Design Manual development, and General Plan updates. This category includes expenses for private and public projects.

¹ Watershed Component costs are a subset of the Jurisdictional Component Administration and IDDE costs listed in Table 1 and do not include Capital Improvements Program (CIP) costs. CIP costs are only included in the Jurisdictional Component's Storm Water Division Capital Improvements Program Category.

Construction (\$1,895,854)

Activities identified in this section represent personnel and non-personnel expenses for plan check review services, field inspections related to grading permits, public improvements, and building activities. This category includes expenses for private and public projects.

Municipal (\$32,647,590)

Activities identified in this section represent personnel and non-personnel expenses for street sweeping, storm drain and channel maintenance, BMP implementation, and municipal facility and activity inspections. Additionally, this section includes the expenditures for Fire Department activities not related to emergency firefighting, such as facility inspections, storm water BMPs, etc.

Capital Improvement Program (\$38,048,195)

Activities identified in this section represent personnel and non-personnel expenses for implementation of new construction and planned improvements to existing facilities for storm water management. Projects may include, but are not limited to, the construction, purchase, or major renovation of buildings, utility systems, and other facilities to achieve storm water requirements. In addition, they may also include land acquisitions and roadway projects to install storm water facilities.

Industrial and Commercial (\$572,711)

Activities identified in this section represent personnel and non-personnel expenses for inspection of industrial and commercial facilities. This also includes personnel and non-personnel expenses for the storm water components of Food Establishment Wastewater Discharge Program (FEWD) and Industrial Wastewater Control Program (IWCP) inspections.

Residential, Education, and Public Participation (\$4,776,308)

Activities identified in this section represent personnel and non-personnel expenses for educational materials, outreach efforts and events, public service announcements (PSAs), household hazardous waste (HHW) and used oil outreach, and community events.

Illicit Discharge Detection and Elimination (\$9,100,867)

Activities identified in this section represent personnel and non-personnel expenses for **identification and elimination of illicit discharges, enforcing the City's** storm water ordinance and implementation of the administrative civil penalties and citation process, and the urban runoff monitoring program.

Watershed Expenditures

The City's watershed expenditures during FY 2020 for the implementation of the watershed Municipal Permit requirements were provided as actual costs and when the actual costs could not be determined, estimates of actual costs were provided. The Storm Water Division used the expenditure categories (administration, watershed activities, cost share contribution, and other) detailed in the Fiscal Analysis Method for watershed reporting. The watershed expenditures included in this report only capture City expenditures and do not account for any expenditure disbursed by other Copermittees within the watershed(s).

In total, \$15,645,095 was expended in FY 2020 for the implementation of citywide watershed activities. This amount includes costs for the implementation of applicable TMDLs along with special studies.

Regional Expenditures

The City's FY 2020 regional expenditures (\$60,145) for the implementation of the regional Municipal Permit requirements **are primarily the City's share of regional Copermittee** storm water program costs. Additional costs include estimated staff time to attend regional meetings and other related administration costs. The Storm Water Division used the expenditure categories (administration, cost share contribution, regional activities, and other) detailed in the Fiscal Analysis Method for regional reporting. The regional expenditures included in this report only capture City expenditures, and do not account for any expenditure disbursed by other Copermittees in the region.

3.2.1.2 Grant Funding for Special Studies

In addition to resources identified for Municipal Permit requirements, the City actively seeks grants, and other funding sources, for special studies and Capital Improvement Projects. For the most part, funding for these projects may be limited to the projects specified and the City may restrict funding reallocation to other projects. Therefore, these resources are currently not incorporated in calculations for total Municipal Permit requirements expenditures. There was no grant funding for special studies and Capital Improvement Projects secured in FY 2020.

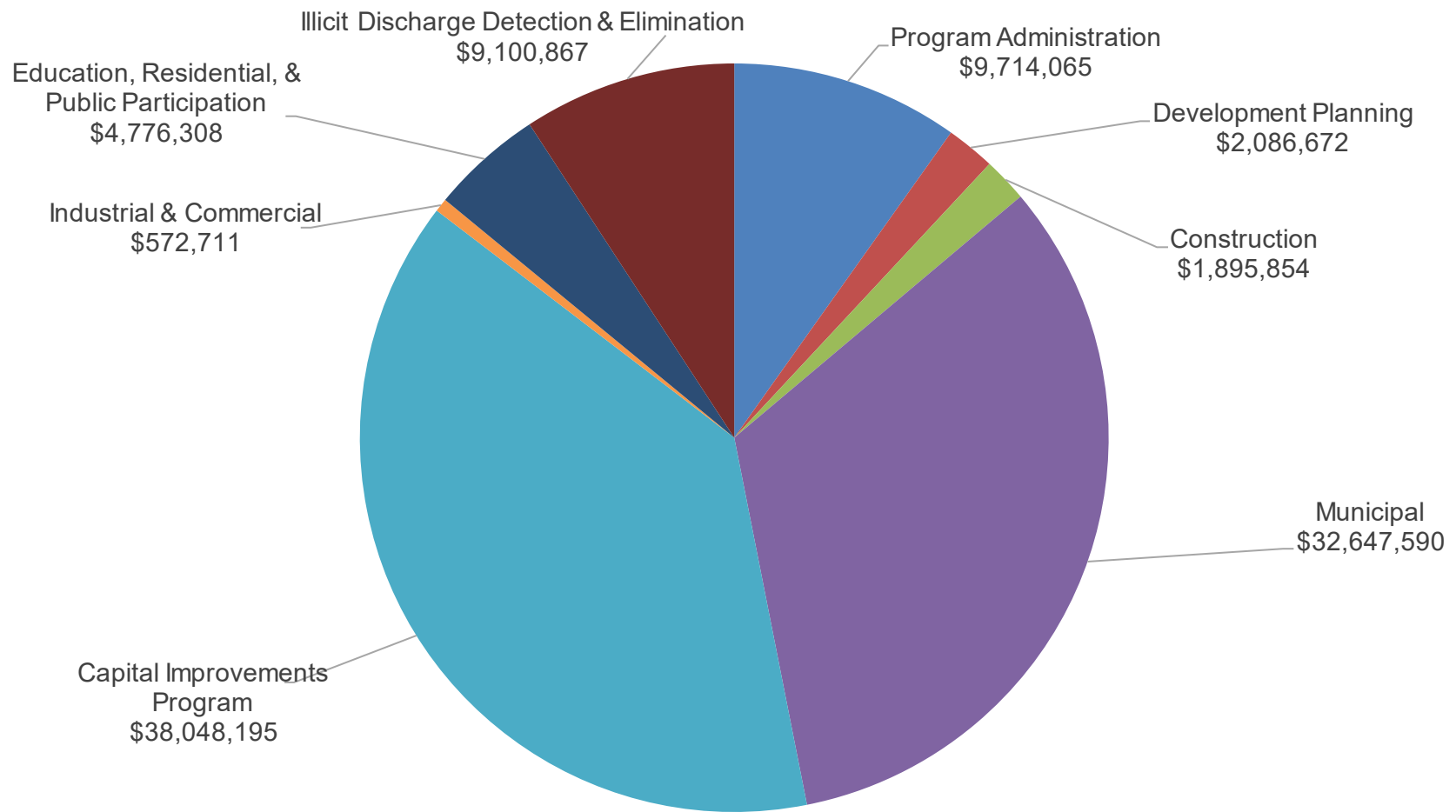


Figure 1: FY 2020 Citywide JRMP Expenditures by Permit Area

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3.2.2 Funding Sources

Citywide implementation of Municipal Permit requirements is funded through four main types of governmental funds: the General Fund, Special Revenue Funds, Enterprise Funds, and Internal Service Funds.

3.2.2.1.1 General Fund

The General Fund is the main fund for the City and is supported by major revenue sources, including property tax, sales tax, transient occupancy tax, and franchise fees. Departments funded by the General Fund provide core community services.

3.2.2.1.2 Special Revenue Funds

Special Revenue Funds account for revenues received for specifically identified purposes. Some of the larger funds that fall under this category include TransNet, Gas Tax, and Special Promotion programs.

3.2.2.1.3 Enterprise Funds

Enterprise Funds are initiated for specific purposes and funded through fees for services. This funding type is designated for the operations, management, maintenance, and development of the department providing the service. For implementation of citywide JRMP activities, activities are funded through the following enterprise funds:

- Airports Fund
- Development Services Enterprise Fund
- Golf Course Enterprise Fund
- Recycling Fund
- Refuse Disposal Fund
- Sewer Revenue Funds
- Water Utility Fund

3.2.2.1.4 Internal Service Funds

Internal Service Funds are comprised of fees for services provided by one City department to another City department or division. For implementation of citywide JRMP activities, activities are funded through the following internal service funds:

- Engineering and Capital Projects Fund
- Equipment Division Funds

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City of San Diego FY 2020 JRMP Annual Report

Attachment 1

Table 1: Summary of Watershed Specific Data from the IDDE Program

JRMP Annual Report Form – Section IV. Illicit Discharge Detection and Elimination Program	San Dieguito Watershed	Los Peñasquitos Watershed	Mission Bay/La Jolla Watershed	San Diego River Watershed	San Diego Bay Watershed	Tijuana River Watershed	Total Citywide FY20
Number of non-storm water discharges reported by the public	102	382	477	528	719	37	2,245
Number of non-storm water discharges detected by Copermittee staff or contractors	21	126	158	176	161	21	663
Number of non-storm water discharges investigated by the Copermittee	123	508	635	702	880	58	2,906
Number of sources of non-storm water discharges identified	123	508	635	702	880	58	2,906
Number of non-storm water discharges eliminated	114	483	613	670	836	44	2,760
Number of sources of illicit discharges or connections identified	123	508	636	703	880	58	2,908
Number of illicit discharges or connections eliminated	114	483	614	671	836	44	2,762
Number of enforcement actions issued	96	355	433	567	614	42	2,107
Number of escalated enforcement actions issued	64	178	261	357	315	28	1,203

City of San Diego FY 2020 JRMP Annual Report

Attachment 1

Table 2: Summary of Watershed Specific Data from the Development Planning Program

JRMP Annual Report Form – Section V. Development Planning Program	San Dieguito Watershed	Los Peñasquitos Watershed	Mission Bay/ La Jolla Watershed	San Diego River Watershed	San Diego Bay Watershed	Tijuana River Watershed	Total Citywide FY20
Number of proposed development projects in review	47	172	313	226	502	44	1,304
Number of Priority Development Projects in review	9	34	24	38	49	17	171
Number of Priority Development Projects approved	27	55	30	51	39	24	226
Number of approved Priority Development Projects exempt from any BMP requirements	0	0	0	0	0	0	0
Number of approved Priority Development Projects allowed alternative compliance	0	0	0	0	0	0	0
Number of Priority Development Projects granted occupancy	33	50	32	41	37	21	214
Number of completed Priority Development Projects in inventory	130	302	189	325	83	108	1,137
Number of high priority Priority Development Project structural BMP inspections	1	15	4	6	0	2	28
Number of Priority development project structural violations	10	14	15	11	2	12	64
Number of enforcement actions issued	10	14	15	11	2	12	64
Number of escalated enforcement actions issued	0	0	0	0	0	0	0

City of San Diego FY 2020 JRMP Annual Report

Attachment 1

Table 3: Summary of Watershed Specific Data from the Construction Management Program

JRMP Annual Report Form – Section VI. Construction Management Program	San Dieguito Watershed	Los Peñasquitos Watershed	Mission Bay/ La Jolla Watershed	San Diego River Watershed	San Diego Bay Watershed	Tijuana River Watershed	Total Citywide FY20
Number of construction sites in inventory	909	1,105	2,102	1,610	2,425	231	8,382
Number of active construction sites in inventory	314	517	962	667	1,154	90	3,704
Number of inactive construction sites in inventory	60	61	212	112	187	3	635
Number of construction sites closed/completed during reporting period	535	527	928	831	1,084	138	4,043
Number of construction site inspections	8,576	8,481	13,436	11,855	15,707	1,958	60,013
Number of construction site violations	1,129	604	857	888	1,122	205	4,805
Number of enforcement actions issued	999	385	521	564	420	72	2,961
Number of escalated enforcement actions issued	58	19	35	19	54	6	191

City of San Diego FY 2020 JRMP Annual Report

Attachment 1

Table 4: Summary of Watershed Specific Data from the Existing Development Management Program

JRMP Annual Report Form – Section VII. Existing Development Management Program	San Dieguito Watershed				Los Peñasquitos Watershed				Mission Bay/La Jolla Watershed				San Diego River Watershed				San Diego Bay Watershed				Tijuana River Watershed				Total Citywide FY 2020			
	MUN	COM	IND	RES	MUN	COM	IND	RES	MUN	COM	IND	RES	MUN	COM	IND	RES	MUN	COM	IND	RES	MUN	COM	IND	RES	MUN	COM	IND	RES
Number of facilities or areas in inventory	43	192	39	12	134	1,178	516	27	173	1,473	207	32	136	1,539	283	33	201	3,339	390	70	25	287	218	6	712	8,008	1,653	180
Number of existing development inspections	25	140	32	0	124	719	253	0	136	1,027	101	0	126	850	110	0	184	2,033	168	0	19	181	111	0	614	4,950	775	0
Number of follow-up inspections	0	5	2	0	0	19	9	0	0	7	4	0	0	16	8	0	0	19	2	0	0	0	2	0	0	66	27	0
Number of violations	0	40	12	57	4	157	32	166	10	93	13	201	22	115	38	247	39	173	20	502	7	6	3	21	82	584	118	1,194
Number of enforcement actions issued	0	24	12	5	4	53	28	13	10	29	11	15	22	40	17	16	39	49	4	37	7	2	2	5	82	197	74	91
Number of escalated enforcement actions issued	0	39	12	52	0	155	31	153	0	88	13	186	0	113	37	231	0	162	20	465	0	6	3	16	0	563	116	1,103

MUN Municipal
 COM Commercial
 IND Industrial
 RES Residential