



THE CITY OF SAN DIEGO

January 22, 2019

VIA EMAIL TO: SanDiego@waterboards.ca.gov

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

Subject: City of San Diego Fiscal Year 18 JRMP Annual Report, Permit No. R9-2013-0001:
PIN 255222

Dear Ms. Walsh:

In accordance with MS4 Permit Provision F.3.b, the City of San Diego's Fiscal Year (FY) 18 Jurisdictional Runoff Management Program (JRMP) Annual Report, including the City of San Diego response to the irrigation runoff audit from the San Diego Water Board, is being submitted as an appendix to the annual reports for the Water Quality Improvement Plans for which the City of San Diego is a responsible agency. To comply with a January 7, 2019 email request from San Diego Water Board staff, we are also submitting the City of San Diego's FY 18 JRMP Annual Report as a separate PDF file to facilitate SMARTS upload by San Diego Water Board staff. The separate PDF file of the JRMP Annual Report is attached, including watershed-specific data for each watershed in which the City of San Diego is a responsible agency.

Should you have any questions, please contact Jim Harry, Senior Planner, at (858) 541-4353 or at jharry@sandiego.gov.

Sincerely,

Drew Kleis
Deputy Director

DK/jph

Enclosures: FY 18 JRMP Annual Report (with Attachments)

Transportation & Storm Water Department

9370 Chesapeake Drive, Suite 100, MS 1900 • San Diego, CA 92123

Hotline (619) 235-1000 Fax (858) 541-4350



I. COPERMITTEE INFORMATION	
Copermittee Name: City of San Diego (San Dieguito WMA)	
Copermittee Primary Contact Name: Drew Kleis, Deputy Director, Storm Water Division, Transportation & Storm Water 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 ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public	28
Number of non-storm water discharges detected by Copermittee staff or contractors	57
Number of non-storm water discharges investigated by the Copermittee	85
Number of sources of non-storm water discharges identified	65
Number of non-storm water discharges eliminated	59
Number of sources of illicit discharges or connections identified	69
Number of illicit discharges or connections eliminated	57 ³
Number of enforcement actions issued	79 ³
Number of escalated enforcement actions issued	46
V. DEVELOPMENT PLANNING PROGRAM²	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES ¹ <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	25 ⁵
Number of Priority Development Projects in review	1 ⁶
Number of Priority Development Projects approved	96 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	25 ⁸
Number of completed Priority Development Projects in inventory	139 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	98 ¹¹
Number of escalated enforcement actions issued	3

VI. CONSTRUCTION MANAGEMENT PROGRAM²				
Has the Copermittee implemented a construction management program that complies with Order No. R9-2013-0001?				YES ^{1,12} <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of construction sites in inventory				1,146
Number of active construction sites in inventory				434
Number of inactive construction sites in inventory				72
Number of construction sites closed/completed during reporting period				640
Number of construction site inspections				11,993
Number of construction site violations				753
Number of enforcement actions issued				748
Number of escalated enforcement actions issued				5
VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM²				
Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001?				YES ^{1,13} <input checked="" type="checkbox"/> NO <input type="checkbox"/>
	Municipal	Commercial	Industrial	Residential
Number of facilities or areas in inventory	24	225 ¹⁴	40	12 ¹⁵
Number of existing development inspections	24	218	4	1 ¹⁵
Number of follow-up inspections	0	0	3	0
Number of violations	1	15	0	72 ¹⁵
Number of enforcement actions issued	2	11	0	65 ¹⁵
Number of escalated enforcement actions issued	1	10	0	35
VIII. PUBLIC EDUCATION AND PARTICIPATION				
Has the Copermittee implemented a public education program component that complies with Order No. R9-2013-0001?				YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Has the Copermittee implemented a public participation program component that complies with Order No. R9-2013-0001?				YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
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 ^{1,16} <input checked="" type="checkbox"/> NO <input type="checkbox"/>

X. CERTIFICATION	
I [<input type="checkbox"/> Principal Executive Officer <input type="checkbox"/> Ranking Elected Official <input checked="" type="checkbox"/> 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.	

	1/22/19
Signature	Date
Drew Kleis	Deputy Director
Print Name	Title
(858) 541-4320	Akleis@sandiego.gov
Telephone Number	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.

² See the JRMP Annual Report FY 2018 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 2017 were still under investigation at the end of FY 2018.

⁴ The Storm Water Standards Manual (Part 1: BMP Design Manual, and Part 2: Construction BMP Standards) was updated in January 2016.

⁵ The number of ongoing Standard and Priority Development Projects in review as of 6/30/18. 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 6/30/18. 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 2018.

⁸ This number includes the City's Priority Development Projects that received final inspection in FY 2018 as well as certain Priority Development buildings and grading projects that did not require a Certificate of Occupancy, that were completed in FY 2018.

⁹ Represents the total number of completed Priority Development Projects in the City's inventory at the end of FY 2018. 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 Responses in this report are based on the City's internal data. Potential program deficiencies were identified by the Regional Board in FY 2018, however, the City has taken steps to correct issues identified by the Regional Board as detailed in the JRMP Annual Report FY 2018 Appendix.

¹³ 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. ESD did not inspect one of its facilities in FY18, although all other ESD facilities were inspected twice in FY18. While this technically does not meet the commitment made in the JRMP, the facility has already been inspected more than once during the current 5-year period, and the City inspected over 20% of its inventoried existing development in FY18, which means the minimum Permit requirement has been met. For this reason, the first question in Section VII of the JRMP Annual Report form ("Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001?") has been answered "Yes". ESD has been informed that it needs to ensure all its sites are inspected twice during FY19.

¹⁴ 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.

¹⁵ 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, all individual issues noted at each residence during an RMA inspection is counted as a separate violation and/or enforcement action.

¹⁶ See the JRMP Annual Report FY 2018 Appendix for the FY 2018 Fiscal Analysis.

I. COPERMITTEE INFORMATION	
Copermittee Name: City of San Diego (Los Peñasquitos WMA)	
Copermittee Primary Contact Name: Drew Kleis, Deputy Director, Storm Water Division, Transportation & Storm Water 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 ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public	133
Number of non-storm water discharges detected by Copermittee staff or contractors	151
Number of non-storm water discharges investigated by the Copermittee	284
Number of sources of non-storm water discharges identified	228
Number of non-storm water discharges eliminated	223
Number of sources of illicit discharges or connections identified	221
Number of illicit discharges or connections eliminated	196 ³
Number of enforcement actions issued	284 ³
Number of escalated enforcement actions issued	103
V. DEVELOPMENT PLANNING PROGRAM²	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES ¹ <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	125 ⁵
Number of Priority Development Projects in review	19 ⁶
Number of Priority Development Projects approved	82 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	10 ⁸
Number of completed Priority Development Projects in inventory	211 ⁹
Number of high priority Priority Development Project structural BMP inspections	9
Number of Priority Development Project structural BMP violations	32 ¹⁰
Number of enforcement actions issued	143 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? YES^{1,12} ☒ NO ☐

Number of construction sites in inventory	773
Number of active construction sites in inventory	266
Number of inactive construction sites in inventory	33
Number of construction sites closed/completed during reporting period	474
Number of construction site inspections	6,363
Number of construction site violations	359
Number of enforcement actions issued	364
Number of escalated enforcement actions issued	0

VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM²

Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001? YES^{1,13} ☒ NO ☐

	Municipal	Commercial	Industrial	Residential
Number of facilities or areas in inventory	123	1,517 ¹⁴	509	27 ¹⁵
Number of existing development inspections	122	937	58	4 ¹⁵
Number of follow-up inspections	0	5	0	0
Number of violations	7	47	4	231 ¹⁵
Number of enforcement actions issued	4	46	3	232 ¹⁵
Number of escalated enforcement actions issued	0	27	3	74

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? YES¹⁶ ☒ 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

6/22/19
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.

² See the JRMP Annual Report FY 2018 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 2018 were still under investigation at the end of FY 2018.

⁴ The Storm Water Standards Manual (Part 1: BMP Design Manual, and Part 2: Construction BMP Standards) was updated in January 2016.

⁵ The number of ongoing Standard and Priority Development Projects in review as of 6/30/18. 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 6/30/18. 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 2018.

⁸ This number includes the City's Priority Development Projects that received final inspection in FY 2018 as well as certain Priority Development buildings and grading projects that did not require a Certificate of Occupancy, that were completed in FY 2018.

⁹ Represents the total number of completed Priority Development Projects in the City's inventory at the end of FY 2018. 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.

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¹³ 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. ESD did not inspect one of its facilities in FY18, although all other ESD facilities were inspected twice in FY18. While this technically does not meet the commitment made in the JRMP, the facility has already been inspected more than once during the current 5-year period, and the City inspected over 20% of its inventoried existing development in FY18, which means the minimum Permit requirement has been met. For this reason, the first question in Section VII of the JRMP Annual Report form ("Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001?") has been answered "Yes". ESD has been informed that it needs to ensure all its sites are inspected twice during FY19.

¹⁴ 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.

¹⁵ 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, all individual issues noted at each residence during an RMA inspection is counted as a separate violation and/or enforcement action.

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I. COPERMITTEE INFORMATION	
Copermittee Name: City of San Diego (Mission Bay/La Jolla WMA)	
Copermittee Primary Contact Name: Drew Kleis, Deputy Director, Storm Water Division, Transportation & Storm Water 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	
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"/>
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"/>
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 ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public	283
Number of non-storm water discharges detected by Copermittee staff or contractors	307
Number of non-storm water discharges investigated by the Copermittee	586
Number of sources of non-storm water discharges identified	458
Number of non-storm water discharges eliminated	444
Number of sources of illicit discharges or connections identified	445
Number of illicit discharges or connections eliminated	367³
Number of enforcement actions issued	538³
Number of escalated enforcement actions issued	297
V. DEVELOPMENT PLANNING PROGRAM²	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES ¹ <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	235⁵
Number of Priority Development Projects in review	26⁶
Number of Priority Development Projects approved	63⁷
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	61⁸
Number of completed Priority Development Projects in inventory	172⁹
Number of high priority Priority Development Project structural BMP inspections	1
Number of Priority Development Project structural BMP violations	11¹⁰
Number of enforcement actions issued	112¹¹
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?				YES ^{1,12} <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of construction sites in inventory	3,331			
Number of active construction sites in inventory	1,119			
Number of inactive construction sites in inventory	224			
Number of construction sites closed/completed during reporting period	1,987			
Number of construction site inspections	21,637			
Number of construction site violations	1,728			
Number of enforcement actions issued	1,732			
Number of escalated enforcement actions issued	1			
VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM²				
Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001?				YES ^{1,13} <input checked="" type="checkbox"/> NO <input type="checkbox"/>
	Municipal	Commercial	Industrial	Residential
Number of facilities or areas in inventory	136	1,595 ¹⁴	214	32 ¹⁵
Number of existing development inspections	135	1,568	23	6 ¹⁵
Number of follow-up inspections	0	28	1	0
Number of violations	36	170	0	399 ¹⁵
Number of enforcement actions issued	5	181	2	360 ¹⁵
Number of escalated enforcement actions issued	0	152	0	163
VIII. PUBLIC EDUCATION AND PARTICIPATION				
Has the Copermittee implemented a public education program component that complies with Order No. R9-2013-0001?				YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Has the Copermittee implemented a public participation program component that complies with Order No. R9-2013-0001?				YES ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
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, 16} <input checked="" type="checkbox"/> NO <input type="checkbox"/>

X. CERTIFICATION	
<p>I [<input type="checkbox"/> Principal Executive Officer <input type="checkbox"/> Ranking Elected Official <input checked="" type="checkbox"/> 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.</p>	

<p><u></u> Signature</p> <p><u>Drew Kleis</u> Print Name</p> <p><u>(858) 541-4320</u> Telephone Number</p>	<p><u>11/22/19</u> Date</p> <p><u>Deputy Director</u> Title</p> <p><u>Akleis@sandiego.gov</u> Email</p>
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Copermittee Name: City of San Diego (San Diego River WMA)	
Copermittee Primary Contact Name: Drew Kleis, Deputy Director, Storm Water Division, Transportation & Storm Water 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 ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public	220
Number of non-storm water discharges detected by Copermittee staff or contractors	304
Number of non-storm water discharges investigated by the Copermittee	522
Number of sources of non-storm water discharges identified	427
Number of non-storm water discharges eliminated	425
Number of sources of illicit discharges or connections identified	396
Number of illicit discharges or connections eliminated	358 ³
Number of enforcement actions issued	463 ³
Number of escalated enforcement actions issued	375
V. DEVELOPMENT PLANNING PROGRAM²	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES ¹ <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	100 ⁵
Number of Priority Development Projects in review	29 ⁶
Number of Priority Development Projects approved	104 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	135 ⁹
Number of high priority Priority Development Project structural BMP inspections	0 ¹⁰
Number of Priority Development Project structural BMP violations	9 ¹¹
Number of enforcement actions issued	81 ¹²
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? YES^{1,13} ☒ NO ☐

Number of construction sites in inventory	1,619
Number of active construction sites in inventory	612
Number of inactive construction sites in inventory	128
Number of construction sites closed/completed during reporting period	879
Number of construction site inspections	11,199
Number of construction site violations	869
Number of enforcement actions issued	875
Number of escalated enforcement actions issued	2

VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM²

Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001? YES^{1,14} ☒ NO ☐

	Municipal	Commercial	Industrial	Residential
Number of facilities or areas in inventory	110	1,767 ¹⁵	299	33 ¹⁶
Number of existing development inspections	109	1,490	15	8 ¹⁶
Number of follow-up inspections	0	45	0	0
Number of violations	19	253	1	299 ¹⁶
Number of enforcement actions issued	5	216	1	250 ¹⁶
Number of escalated enforcement actions issued	2	198	1	190

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^{1,17} ☒ 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

1/22/19
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.

² See the JRMP Annual Report FY 2018 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 2018 were still under investigation at the end of FY 2018.

⁴ The Storm Water Standards Manual (Part 1: BMP Design Manual, and Part 2: Construction BMP Standards) was updated in January 2016.

⁵ The number of ongoing Standard and Priority Development Projects in review as of 6/30/18. 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 6/30/18. 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 2018.

⁸ This number includes the City's Priority Development Projects that received final inspection in FY 2018 as well as certain Priority Development buildings and grading projects that did not require a Certificate of Occupancy, that were completed in FY 2018.

⁹ Represents the total number of completed Priority Development Projects in the City's inventory at the end of FY 2018. These projects include completed projects that were entered into the inventory in previous years.

¹⁰ No high priority Priority Development Project structural BMP inspections were required in this watershed

¹¹ 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.

¹² 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.

¹³ Responses in this report are based on the City's internal data. Potential program deficiencies were identified by the Regional Board in FY 2018, however, the City has taken steps to correct issues identified by the Regional Board as detailed in the JRMP Annual Report FY 2018 Appendix.

¹⁴ 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. ESD did not inspect one of its facilities in FY18, although all other ESD facilities were inspected twice in FY18. While this technically does not meet the commitment made in the JRMP, the facility has already been inspected more than once during the current 5-year period, and the City inspected over 20% of its inventoried existing development in FY18, which means the minimum Permit requirement has been met. For this reason, the first question in Section VII of the JRMP Annual Report form ("Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001?") has been answered "Yes". ESD has been informed that it needs to ensure all its sites are inspected twice during FY19.

¹⁵ 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.

¹⁶ 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, all individual issues noted at each residence during an RMA inspection is counted as a separate violation and/or enforcement action.

¹⁷ See the JRMP Annual Report FY 2018 Appendix for the FY 2018 Fiscal Analysis.

I. COPERMITTEE INFORMATION	
Copermittee Name: City of San Diego (San Diego Bay WMA)	
Copermittee Primary Contact Name: Drew Kleis, Deputy Director, Storm Water Division, Transportation & Storm Water 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 ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public	437
Number of non-storm water discharges detected by Copermittee staff or contractors	522
Number of non-storm water discharges investigated by the Copermittee	959
Number of sources of non-storm water discharges identified	786
Number of non-storm water discharges eliminated	770
Number of sources of illicit discharges or connections identified	731
Number of illicit discharges or connections eliminated	599 ³
Number of enforcement actions issued	839 ³
Number of escalated enforcement actions issued	710
V. DEVELOPMENT PLANNING PROGRAM²	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES ¹ <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	329 ⁵
Number of Priority Development Projects in review	44 ⁶
Number of Priority Development Projects approved	87 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	269 ⁹
Number of high priority Priority Development Project structural BMP inspections	1
Number of Priority Development Project structural BMP violations	16 ¹⁰
Number of enforcement actions issued	165 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? YES^{1,12} ☒ NO ☐

Number of construction sites in inventory	2,832
Number of active construction sites in inventory	1,087
Number of inactive construction sites in inventory	214
Number of construction sites closed/completed during reporting period	1,531
Number of construction site inspections	20,772
Number of construction site violations	1,301
Number of enforcement actions issued	1,302
Number of escalated enforcement actions issued	2

VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM²

Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001? YES^{1,13} ☒ NO ☐

	Municipal	Commercial	Industrial	Residential
Number of facilities or areas in inventory	182	3,465 ¹⁴	418	70 ¹⁵
Number of existing development inspections	181	2,685	39	7 ¹⁵
Number of follow-up inspections	0	30	0	0
Number of violations	43	435	7	514 ¹⁵
Number of enforcement actions issued	11	433	2	391 ¹⁵
Number of escalated enforcement actions issued	2	410	3	309

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, 16} ☒ 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

1/22/19
Date

Drew Kleis
Print Name

Deputy Director
Title

(858) 541-4320
Telephone Number

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.

² See the JRMP Annual Report FY 2018 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 2018 were still under investigation at the end of FY 2018.

⁴ The Storm Water Standards Manual (Part 1: BMP Design Manual, and Part 2: Construction BMP Standards) was updated in January 2016.

⁵ The number of ongoing Standard and Priority Development Projects in review as of 6/30/18. 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 6/30/18. 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 2018.

⁸ This number includes the City's Priority Development Projects that received final inspection in FY 2018 as well as certain Priority Development buildings and grading projects that did not require a Certificate of Occupancy, that were completed in FY 2018.

⁹ Represents the total number of completed Priority Development Projects in the City's inventory at the end of FY 2018. 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 Responses in this report are based on the City's internal data. Potential program deficiencies were identified by the Regional Board in FY 2018, however, the City has taken steps to correct issues identified by the Regional Board as detailed in the JRMP Annual Report FY 2018 Appendix.

¹³ 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. ESD did not inspect one of its facilities in FY18, although all other ESD facilities were inspected twice in FY18. While this technically does not meet the commitment made in the JRMP, the facility has already been inspected more than once during the current 5-year period, and the City inspected over 20% of its inventoried existing development in FY18, which means the minimum Permit requirement has been met. For this reason, the first question in Section VII of the JRMP Annual Report form ("Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001?") has been answered "Yes". ESD has been informed that it needs to ensure all its sites are inspected twice during FY19.

¹⁴ 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.

¹⁵ 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, all individual issues noted at each residence during an RMA inspection is counted as a separate violation and/or enforcement action.

¹⁶ See the JRMP Annual Report FY 2018 Appendix for the FY 2018 Fiscal Analysis.

I. COPERMITTEE INFORMATION	
Copermittee Name: City of San Diego (Tijuana WMA)	
Copermittee Primary Contact Name: Drew Kleis, Deputy Director, Storm Water Division, Transportation & Storm Water 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 ¹ <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public	15
Number of non-storm water discharges detected by Copermittee staff or contractors	30
Number of non-storm water discharges investigated by the Copermittee	44
Number of sources of non-storm water discharges identified	32
Number of non-storm water discharges eliminated	32
Number of sources of illicit discharges or connections identified	34
Number of illicit discharges or connections eliminated	24 ³
Number of enforcement actions issued	31 ³
Number of escalated enforcement actions issued	26
V. DEVELOPMENT PLANNING PROGRAM²	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES ¹ <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	79 ⁵
Number of Priority Development Projects in review	1 ⁶
Number of Priority Development Projects approved	35 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	11 ⁸
Number of completed Priority Development Projects in inventory	99 ⁹
Number of high priority Priority Development Project structural BMP inspections	5
Number of Priority Development Project structural BMP violations	5 ¹⁰
Number of enforcement actions issued	61 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? YES^{1,12} ☒ NO ☐

Number of construction sites in inventory	328
Number of active construction sites in inventory	98
Number of inactive construction sites in inventory	15
Number of construction sites closed/completed during reporting period	216
Number of construction site inspections	1,689
Number of construction site violations	84
Number of enforcement actions issued	85
Number of escalated enforcement actions issued	0

VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM²

Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001? YES^{1,13} ☒ NO ☐

	Municipal	Commercial	Industrial	Residential
Number of facilities or areas in inventory	19	444 ¹⁴	212	6 ¹⁵
Number of existing development inspections	19	148	22	0 ¹⁵
Number of follow-up inspections	0	4	0	0
Number of violations	3	16	1	27 ¹⁵
Number of enforcement actions issued	0	6	1	24 ¹⁵
Number of escalated enforcement actions issued	0	9	1	21

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^{1,16} ☒ 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

1/22/19
Date

Deputy Director
Title

Akleis@sandiego.gov
Email

City of San Diego FY 2018 JRMP Annual Report – Tijuana Watershed Management Area

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.

² See the JRMP Annual Report FY 2018 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 2018 were still under investigation at the end of FY 2017.

⁴ The Storm Water Standards Manual (Part 1: BMP Design Manual, and Part 2: Construction BMP Standards) was updated in January 2016.

⁵ The number of ongoing Standard and Priority Development Projects in review as of 6/30/18. 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 6/30/18. 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 2018.

⁸ This number includes the City's Priority Development Projects that received final inspection in FY 2018 as well as certain Priority Development buildings and grading projects that did not require a Certificate of Occupancy, that were completed in FY 2018.

⁹ Represents the total number of completed Priority Development Projects in the City's inventory at the end of FY 2018. 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 Responses in this report are based on the City's internal data. Potential program deficiencies were identified by the Regional Board in FY 2018, however, the City has taken steps to correct issues identified by the Regional Board as detailed in the JRMP Annual Report FY 2018 Appendix.

¹³ 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. ESD did not inspect one of its facilities in FY18, although all other ESD facilities were inspected twice in FY18. While this technically does not meet the commitment made in the JRMP, the facility has already been inspected more than once during the current 5-year period, and the City inspected over 20% of its inventoried existing development in FY18, which means the minimum Permit requirement has been met. For this reason, the first question in Section VII of the JRMP Annual Report form ("Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001?") has been answered "Yes". ESD has been informed that it needs to ensure all its sites are inspected twice during FY19.

¹⁴ 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.

¹⁵ 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, all individual issues noted at each residence during an RMA inspection is counted as a separate violation and/or enforcement action.

¹⁶ See the JRMP Annual Report FY 2018 Appendix for the FY 2018 Fiscal Analysis.



Office of the Director and City Engineer
Public Works Department

January 15, 2019

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
2018 Annual Report, Public Works Department, Engineering Technical
Services Division Contributions on Public Design Projects

Dear Ms. Walsh:

Please accept this letter as certification of the City of San Diego Public Works Department, Engineering Technical Services Division's contributions to the City of San Diego's JRMP Fiscal Year 2018 Annual Report, and associated Appendices regarding public projects in design phase in Fiscal Year 2018.

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 2018 Annual Report and attachments (associated with the Public Works Department, Engineering Technical 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 "Myrna Dayton", written over a horizontal line.

Myrna Dayton, PE, QSD, QSP, DCE
Assistant Director
Public Works Department

Crd

Cc: Carrie Purcell, Assistant Deputy Director, Public Works Department
Catherine Dungca, Senior Civil Engineer, Public Works Department

January 15, 2019

Erica Ryan, CPSWQ
San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego CA 92108

Dear Ms. Ryan:

Subject: City of San Diego Jurisdictional Runoff Management Plan (JRMP) FY 2018 Annual Report, Development Services Department Engineering Division Contributions

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 2018 Annual Report and associated Appendices.

If you have any questions, please contact Walter Gefrom, Senior Civil Engineer, at 619-446-5442.

I certify under penalty of law that this Jurisdictional Runoff Management Plan Fiscal Year 2018 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 of knowing violations.

Sincerely,



Gregory Hopkins
Assistant Director, Development Services Department

GH/wcg

Cc: Elyse Lowe, Director, Development Services Department
Drew Kleis, Deputy Director, Transportation and Storm Water Department



Development Services Department

Building Construction & Safety Division

January 11, 2019

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 2018 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 2018 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 2018 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 blue ink, appearing to read "Afsaneh Ahmadi".

Afsaneh Ahmadi, PE, CBO
Chief Building Official/Deputy Director
Development Services Department

Public Works

Office of the Director and City Engineer

January 18, 2019

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

Dear Ms. Walsh:

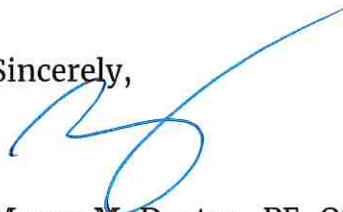
Subject: City of San Diego Jurisdictional Runoff Management Plan (JRMP) FY 2018
Annual Report, Public Works Department, Construction Management and
Field Services Division Contributions

Please accept this letter as certification of the City of San Diego Public Works
Department, Construction Management and Field Services Division's contributions
to the City of San Diego's JRMP Fiscal Year 2018 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 2018 Annual Report and attachments (associated with the Public Works Department Construction Management and Field 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, 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,



Myrna M. Dayton, PE, QSP, QSD, DCE
Assistant Director

APPENDIX

1 OPERATIONAL ADAPTIVE MANAGEMENT

The following are operational adaptive management improvements that the City made during Fiscal Year (FY) 2018:

- **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), developed in FY 18 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**

The multi-year effort of creating the Chollas Watershed Master Plan (CWMP) was continued in 2018. 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 2018. 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 2017 reporting period.

- **Water Quality Improvement Plans**

In FY 2018 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 Refinements**

In FY 2018, the City identified refinements to the JRMP. The updated JRMP can be viewed at <https://www.sandiego.gov/stormwater/plansreports/jrmp>. Minor modifications to the JRMP were made to clarify interdepartmental coordination on irrigation runoff and trash collection.

- **Irrigation Audit Response**

The City received an irrigation runoff audit from the San Diego Regional Water Board (Regional Board) in the summer of 2018. This audit evaluated the ability of the City's jurisdictional program to effectively prohibit over-irrigation and the level of implementation in five general JRMP categories, as defined by specific provisions in the Regional MS4 Permit. The table below summarizes the five JRMP categories, the associated Regional MS4 Permit provisions, and the City's resources reviewed during the audit:

JRMP Program Category	Provision(s)	Copermittee Resources Reviewed
1. Legal Authority	II.E.1	Municipal Code
2. Public Education and Outreach	II.E.2, II.E.7	Website, JRMP, Hotline Reporting
3. Illicit Discharge Detection and Elimination (IDDE)/Enforcement	II.E.2, II.E.6	Website, JRMP, Hotline Reporting
4. Watershed Management Area Water Quality Improvement Plan (WQIP)	II.B.3, II.D.2	Accepted Watershed Management Area Water Quality Improvement Plan(s) High Priority Water Quality Conditions, Priority Water Quality Conditions, Numeric Goals and Schedules, and MS4 Outfall Persistent Dry-Weather Flow
5. JRMP Strategies	II.B.3, II.E.5, II.F.2.a	Accepted Watershed Management Area Water Quality Improvement Plan, Website, JRMP

As required, the City has included its response to the audit in the FY 2018 JRMP Annual Report: See Attachment 2 for the City's response. This attachment contains the City's

responses to the recommendations for program improvements and program deficiencies that were identified in the audit.

- **General Plan and Community Plan Amendments**

- **Midway - Pacific Highway Community Plan Update**

- Date started: Nov. 2010
 - Adoption or anticipated adoption date: Fall 2018
 - Key storm water issue addressed by the plan: Storm water flooding associated with high tides and high water table.
 - Recommendations for improvements that include storm water:
 - Green Street improvements to Midway Drive, Barnett Avenue, Lytton Street, Rosecrans Street, Pacific Highway, Witherby Street, West Washington Street, Palm Street, Laurel Street, and five proposed new streets.
 - Policies that address storm water:
 - Incorporate green street improvements along Midway Drive, Dutch Flats Parkway, Charles Lindbergh Parkway, and Barnett Avenue.
 - Provide a furnishing area between the curb and the sidewalk, with street trees and plantings within parkway planting areas, bioswales, or tree wells, to enhance the pedestrian environment and capture urban runoff where feasible. (Refer also to the Urban Greening section.)
 - Design green streets [as identified in Figure 4-1] that incorporate enhanced pedestrian and bicycle facilities, canopy street trees, and storm water management features that increase absorption of storm water, pollutants, and carbon dioxide.
 - Minimize the use of impervious surfaces and surfaces that have large thermal gain to promote storm water infiltration and reduce the urban heat island effect.
 - Incorporate low impact development landscaping techniques within surface parking areas, such as inverted planting strips, turf-crete, and tree wells with shade 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.
 - Encourage rooftop gardens and green roofs for their sustainability benefits that include reduced urban runoff and urban heat island effect.
 - 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.
- Consider public-private partnerships to construct storm water management infrastructure as part of linear parks, urban paths, and/or urban greening projects.
- Consider converting the Pacific Highway frontage road and Kurtz Street in the Hancock Transit Corridor to one-way streets to support expanded urban greening projects for storm water management and sidewalk widening.
- Incorporate storm water low impact development practices with the development of park and recreation facilities adjacent to the San Diego River.
- Install low impact development infrastructure that includes components to capture, minimize, and/or prevent pollutants in urban runoff from reaching the San Diego River, San Diego Bay, and Pacific Ocean.
- Encourage innovative best management practices that provide opportunities for enhanced storm water management in public works projects, transportation facilities and private developments. These may include curb inserts, paver filter strips, bulb-out infiltration zones, linear detention basins and infiltrating tree wells.

Old Town Community Plan Update

- Date started: Nov. 2010
- Adoption or anticipated adoption date: Fall 2018
- Key storm water issue addressed by the plan: Storm water flooding associated with position below Mission Hills.
- Recommendations for improvements that include storm water: Green Street improvements on Taylor Street and Pacific Highway.
- Policies that address storm water:
 - Design parking areas for private development and retrofit visitor-serving parking lots to incorporate storm water management features that are reflective of Old Town's pre-1871 community character, such as permeable paving, bio-retention areas or bioswales, and vegetated filter strips with native plant species as landscaping.
 - Incorporate site design features to minimize storm water runoff that are compatible with Old Town's community character (e.g. vegetated bio-retention ponds or bioswales, permeable paving, infiltration trenches, planter boxes, cisterns, or rain barrels).
 - Minimize the use of impervious surfaces and surfaces that have large thermal gain (including asphalt and gravel) to promote storm water infiltration and reduce the Urban Heat Island effect.

- Design parkway and median landscaping areas to incorporate a central indentation to assist in the capture and infiltration of irrigation and storm water.
- Include storm water management features as part of streetscape enhancements along Taylor Street and Pacific Highway.
- Retrofit Pacific Highway to serve as a boulevard street providing a strengthened linkage from the San Diego River Park into Old Town San Diego and to Downtown. These improvements should include storm water management features.
- Increase the community's overall tree canopy within the public right-of-way and development sites to provide air quality benefits and urban runoff management.
- 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 Valley Community Plan

- Date started: Summer 2015
- Adoption or anticipated adoption date: Summer 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.
- 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

- Date started: Summer 2016
- Adoption or anticipated adoption date: 2020
- Key storm water issue addressed by the plan: A draft existing conditions report for hydrology and water quality issues in Kearny Mesa was submitted to the City for review. The report summarized the current drainage and water quality conditions for the planning area. Given the level of development, the planning areas is considered highly impervious, and potential redevelopment, which would be subject to the City's storm water regulations and required to implement LID practices, has the potential to decrease runoff volumes. Coordination with the City's Transportation and Storm Water Department is needed for concurrence on proposed green street identification and

determination on additional policies specific to planning area needed to supplement regulations.

- **Community Plan Activities: Special Studies, Transit Oriented Development Plans, and Specific Plans**

Grantville Trolley Station/Alvarado Creek Enhancement Plan

- Date started: May 2016
- Adoption or anticipated adoption date: September 2017
- Key storm water issue addressed by the plan: Storm water and flooding in Grantville caused by Alvarado Creek.
- Recommendations for improvements that include storm water: Conceptual recommendations for the Alvarado Creek channel were modeled, refined, and then presented to the Flooding Subcommittee and interested stakeholders. The study was also presented to the Navajo Community Planning Group in September.
- Policies that address storm water:
 - The study provided conceptual recommendations for each reach of the creek/channel to address flooding caused by stormwater.

Balboa Avenue Station Area Specific Plan

- Date started: September 2015
- Adoption or anticipated adoption date: December 2018
- 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.
- 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

- Date started: February 2015

- Adoption or anticipated adoption date: Spring 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.
- 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.

De Anza Revitalization Plan/MB Plan Amendment

- Date started: November 2015
- Adoption or anticipated adoption date: Amendment to the Mission Bay Park Master Plan, January, 2019
- 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.

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

- Date started: 2005
- Adoption or anticipated adoption date: FY 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
- 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 appear to be out of compliance due to a variety of circumstances. The City is currently researching and investigating each of these projects to determine whether the structural BMPs were constructed as permitted. If a site is found to be non-compliant, established escalating enforcement procedures previously outlined to the Board will be 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. Five of the 74 sites believed to be out of compliance were brought into compliance during FY 2017. The City efforts to assess the status of the remaining sites was completed on November 30, 2017. The City has since sent Civil Penalty Notices (CPN) to all but 4 of the property owners in violation of the MS4 Permit as of October 31, 2018. All open violations are expected to be resolved before December 2019.

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:

- A major 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. In FY 18, the City held multi-department wet season trainings led by specialty storm water staff from the Public Works, 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 in FY 18 is the continuation of bi-weekly, construction coordination meetings with the storm water staff from the Public Works, 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, two of the projects are expected to be complete in FY20, and the last project is expected to be complete in FY21.

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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 2018 Transitional JRMP Regional Program total expenditures for implementing the Municipal Permit requirements are summarized in Table 1.

Table 1: FY 2018 Jurisdictional, Watershed, and Regional Expenditures Summary

Jurisdictional Component	
Administration	\$10,552,305
Development Planning (including public and private projects)	\$1,965,750
Construction (including public and private projects)	\$854,195
Municipal (including Non-Emergency Fire Fighting expenditures)	\$35,368,156
Storm Water Division Capital Improvements Program (CIP)	\$1,196,196
Industrial and Commercial	\$1,706,604
Residential, Education, and Public Participation	\$6,591,636
Illicit Discharge Detection and Elimination (IDDE)	\$7,680,158
Jurisdictional Total	\$65,915,001
Watershed Component¹	
San Dieguito Watershed	\$986,995
Los Peñasquitos Watershed	\$1,124,027
Mission Bay Watershed	\$1,087,300
San Diego River Watershed	\$1,016,177
San Diego Bay Watershed	\$2,528,113
Tijuana River Watershed	\$1,210,676
Watershed Total	(\$7,953,288)
Regional Component	
Total Copermittee Cost Share for the City of San Diego	\$249,000
Additional Regional Costs for education efforts, monitoring, document reviews, regional meeting attendance, and special projects	\$297,339
Regional Total	\$546,517
Total Costs	\$66,461,518

JRMP Expenditures

The City's FY 2018 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 \$66,461,518 was expended in FY 2018 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 (\$10,552,305)

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 (\$1,965,750)

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 (\$854,195)

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 (\$35,368,156)

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 (\$1,196,196)

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 (\$1,706,604)

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 (\$6,591,636)

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 (\$7,680,158)

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 2018 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, \$7,953,288 was expended in FY 2018 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 2018 regional expenditures (\$546,517) 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 detailed in Section 2.2.1.4 above. Table 2 lists projects that were initiated and/or in progress during FY 2018. It is important to note that the projects span multiple years and the amounts listed below are not just representative of FY 2018.

Table 2: Funding for Special Projects

Funding Source	Project	Amount	Matching Fund Amount	Total Amount ²
DWR Proposition 84 IRWM Grant Programs	Bannock Avenue (LID) Enhancement Project	\$650,000	\$719,550	\$1,369,550
Total Grant Funding		\$1.3 million	\$650,000	\$1,369,550

² Amounts span multiple years and not just FY 2018.

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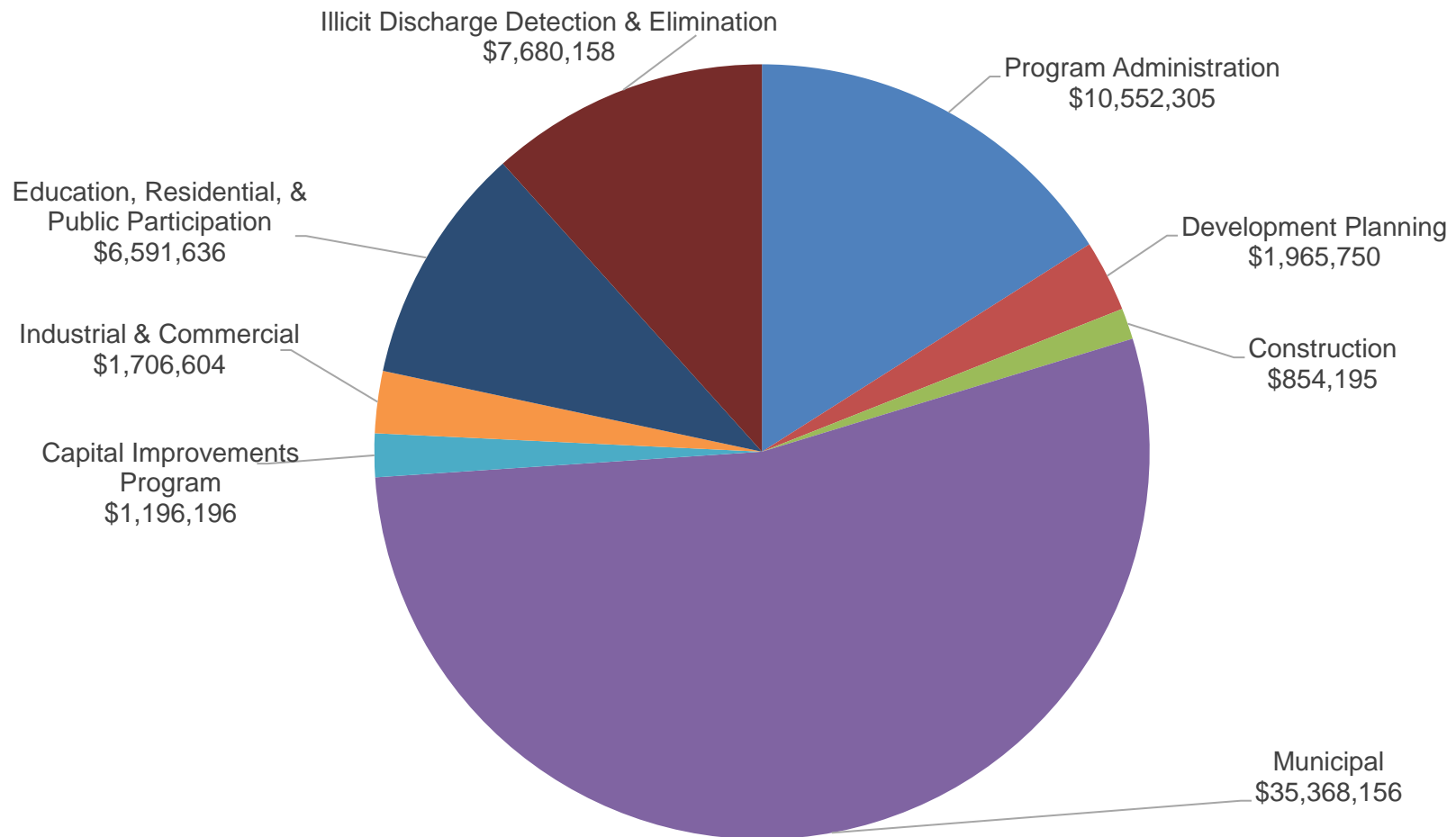


Figure 1: FY 2018 Citywide JRMP Expenditures by Permit Area

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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 2018 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 FY18
Number of non-storm water discharges reported by the public	28	133	283	220	437	15	1,116
Number of non-storm water discharges detected by Copermittee staff or contractors	57	151	307	304	522	30	1,371
Number of non-storm water discharges investigated by the Copermittee	85	284	586	522	959	44	2,480
Number of sources of non-storm water discharges identified	65	228	458	427	786	32	1,996
Number of non-storm water discharges eliminated	59	223	444	425	770	32	1,953
Number of sources of illicit discharges or connections identified	69	221	445	396	731	34	1,896
Number of illicit discharges or connections eliminated	57	196	367	358	599	24	1,601
Number of enforcement actions issued	79	284	538	463	839	31	2,234
Number of escalated enforcement actions issued	46	103	297	375	710	26	1,557

City of San Diego FY 2018 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 FY18
Number of proposed development projects in review	25	125	235	100	329	79	893
Number of Priority Development Projects in review	1	19	26	29	44	1	120
Number of Priority Development Projects approved	96	82	63	104	87	35	467
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	25	10	61	21	41	11	169
Number of completed Priority Development Projects in inventory	139	211	172	135	269	99	1,025
Number of high priority Priority Development Project structural BMP inspections	1	9	1	0	1	5	17
Number of Priority development project structural violations	10	32	11	9	16	5	83
Number of enforcement actions issued	98	143	112	81	165	61	660
Number of escalated enforcement actions issued	3	0	0	0	0	0	3

City of San Diego FY 2018 JRMP Annual Report

Attachment 1

Table 3: Summary of Watershed Specific Data from the Construction Managment 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 FY18
Number of construction sites in inventory	1,146	773	3,331	1,619	2,832	328	10,029
Number of active construction sites in inventory	434	266	1,119	612	1,087	98	3,616
Number of inactive construction sites in inventory	72	33	224	128	214	15	686
Number of construction sites closed/completed during reporting period	640	474	1,987	879	1,531	216	5,727
Number of construction site inspections	11,993	6,363	21,637	11,199	20,772	1,689	73,653
Number of construction site violations	753	359	1,728	869	1,301	84	5,094
Number of enforcement actions issued	748	364	1,732	875	1,302	85	5,106
Number of escalated enforcement actions issued	5	0	1	2	2	0	10

City of San Diego FY 2018 JRMP Annual Report

Attachment 1

Table 4: Summary of Watershed Specific Data from the Existing Development Managment 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 2018			
	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	24	225	40	12	123	1,517	509	27	136	1,595	214	32	110	1,767	299	33	182	3,465	418	70	19	444	212	6	594	9,013	1,692	180
Number of existing development inspections	24	218	4	1	122	937	58	4	135	1,568	23	6	109	1,490	15	8	181	2,685	39	7	19	148	22	0	590	7,046	161	26
Number of follow-up inspections	0	0	3	0	0	5	0	0	0	28	1	0	0	45	0	0	0	30	0	0	0	4	0	0	0	112	4	0
Number of violations	1	15	0	72	7	47	4	231	36	170	0	399	19	253	1	299	43	435	7	514	3	16	1	27	109	936	13	1,542
Number of enforcement actions issued	2	11	0	65	4	46	3	232	5	181	2	360	5	216	1	250	11	433	2	391	0	6	1	24	27	893	9	1,322
Number of escalated enforcement actions issued	1	10	0	35	0	27	3	74	0	152	0	163	2	198	1	190	2	410	3	309	0	9	1	21	5	806	8	792

MUN Municipal
 COM Commercial
 IND Industrial
 RES Residential

**Attachment 2: San Diego Water Board's Over-Irrigation Audit
 Response Matrix for City of San Diego**

No.	Audit Question	Audit Key Findings	City Response/ Actions
1	Has the Copermittee updated its municipal ordinance(s) to reflect the requirements of the Regional MS4 Permit?	Yes	No Action
2	Does the Copermittee have the legal authority in its municipal ordinances to prohibit over-irrigation?	Yes	No Action
3	Is the over-irrigation prohibition clearly identified and easily located by the public on the home page of Copermittee Webpage?	No <ul style="list-style-type: none"> • “The City does not have any links on its home page to clearly assist the public in where to report over-irrigation.” • “There is no category immediately available on the main application page for over-irrigation or water waste. Over-irrigation as a reportable complaint can be located under the storm water subcategory of ‘Storm Drain.’” 	The City of San Diego’s (City) main webpage has rotating items based on current events and the priorities of the City overall. There is a prominent link to the Get it Done application that does clearly outline a place to submit complaints for many issues facing City residents. Over-irrigation is a reportable discharge under the Storm Drain category. A new category has been added to the drop-down list for Over-Irrigation on the main Get it Done page.
4	Is the over-irrigation prohibition clearly identified and easily located as a reportable prohibited discharge by the public through the Copermittee’s hotline reporting system, complaint form, and/or application?	No <ul style="list-style-type: none"> • “There is no category immediately available on the main application page for over-irrigation or water waste. Over-irrigation as a reportable complaint can be located under the storm water subcategory ‘Storm Drain.’” 	SWD added language to the top of the SWD webpage to indicate that over-irrigation runoff is an illegal discharge. Over-irrigation has been listed as a prohibited discharge to the SWD website in the reporting area, along with the other many ways to report a discharge. These include Get it Done, email, or phone calls. Over-irrigation is a reportable discharge on the Get it Done App under the Storm Drain category. A new category has been added to the drop-down list for Over-Irrigation on the main Get it Done page.

No.	Audit Question	Audit Key Findings	City Response/ Actions
5	Is the over-irrigation prohibition clearly identified, easily located and described for the public in the Copermittee's storm water program webpage information?	No <ul style="list-style-type: none"> “Under the Storm Water Division webpage, there is a Storm Water Service Request on the main page with a direct phone line. There is no e-mail link. This link redirects the public to the website version of the Get it Done application. Under the Transportation & Storm Water webpage, there is a Storm Water Hotline and a Report Storm Water Pollution/Storm Water Service request link. This link again reroutes the public to the website version of the Get it Done application.” 	SWD added language to the top of the SWD webpage to be clear that over-irrigation runoff is an illegal discharge. SWD is adding a “Tile” to the front SWD page that focuses on over-irrigation runoff that will include fact sheets. SWD added the email address and expanded the page for reporting a discharge to include more detailed information about how and what to report. SWD also included information about reporting water waste and how it differs from storm water discharges.
6	Is the over-irrigation prohibition clearly identified, easily located and described for the public on the Copermittee's public information outreach documents, handouts or brochures?	No <ul style="list-style-type: none"> “The City's webpages do not have information that could be located on the over-irrigation prohibition or that it is an illicit discharge” 	SWD added language to the SWD webpage to indicate that over-irrigation is an illegal discharge. Fact sheets for each Minimum BMP are included on the Code Enforcement webpage, which was moved to a more prominent location.
7	Does the Copermittee identify local water district prohibitions for over-irrigation and provide direct links to the water district webpage drought information?	No <ul style="list-style-type: none"> “The Water webpage includes a smart phone application to report water waste. However, it does not appear that this is linked or coordinated with the website version of the Get it Done application. Direct links to City Water page were not located on the City's Storm Water website. In addition, there is no summary of the City's coordination with the Water Department on the over-irrigation prohibition or water waste prohibitions.” 	SWD added language to the SWD/PUD webpages to indicate that over-irrigation is an illegal discharge. The City's Public Utilities Department (PUD) has a Waste No Water Application for the public to submit complaints of water waste. It was developed before the Get it Done App was created, and is still being used while the Get it Done App is being phased in. SWD and PUD have added links and discharge/enforcement descriptions to each other's websites to highlight enforcement coordination.

No.	Audit Question	Audit Key Findings	City Response/ Actions
8	Does the Copermittee identify prohibitions for over-irrigation in its JRMP?	Yes	No Action
9	Does the Copermittee actively investigate over-irrigation complaints and implement its enforcement response plan?	No <ul style="list-style-type: none"> “There was very little available or easily accessible information found during the audit that communicated over-irrigation is an illicit discharge.” 	<p>SWD and/or PUD actively investigates every over-irrigation received according to the Standard Operating Procedures outlined in our JRMP. The website has been updated to indicate that over-irrigation is prohibited.</p> <p>The City had already added a “Code Enforcement” page on the SWD website that explains ways to report a discharge, the escalated enforcement process, and fact sheets for all minimum BMPs.</p> <p>The City’s Annual JRMP reports clearly display the actions taken by the SWD Code Enforcement team. This includes all escalating enforcement statistics such as sending letters, Notices of Violations, Citations, and Civil Penalties. In addition, the SWD Code Enforcement Officers conduct regular Residential Patrols and Over-Irrigation Patrols.</p>
10	Does the Copermittee actively coordinate over-irrigation complaints with the local water agency?	No <ul style="list-style-type: none"> “Direct links to City Water page were not located on the City’s Storm Water website. In addition, there is no summary of the City’s coordination with the Water Department on the over-irrigation prohibition or water waste prohibitions. The City’s webpages do not have information that could be located on the over-irrigation prohibition or that it is an illicit discharge.” 	SWD added language to the SWD/PUD webpages to be clear that over-irrigation is an illegal discharge. The City added links to PUD webpage from SWD, and vice versa to highlight enforcement coordination efforts and describe the difference between over-irrigation and runoff.

No.	Audit Question	Audit Key Findings	City Response/ Actions
11	Does the Copermittee actively enforce the over-irrigation prohibition through its enforcement process?	Yes	No Action
12	Does the Copermittee actively coordinate its over-irrigation prohibition program with local water district programs?	No <ul style="list-style-type: none"> “Direct links to City Water page were not located on the City’s Storm Water website. In addition, there is no summary of the City’s coordination with the Water Department on the over-irrigation prohibition or water waste prohibitions. The City’s webpages do not have information that could be located on the over-irrigation prohibition or that it is an illicit discharge.” 	SWD added language to the SWD/PUD webpages to demonstrate that over-irrigation is an illegal discharge. Links to the PUD webpage were included on the SWD page, and vice versa. SWD has added language to the JRMP to be clear that SWD and PUD Water Conservation actively coordinate over-irrigation issues.
13	Does the Copermittee specifically identify enforcement of the over-irrigation prohibition in its JRMP?	Yes	No Action
14	Does the Copermittee identify IDDE and enforcement of the prohibited discharges in its JRMP and Enforcement Response Plan?	Yes	No Action
15	Does the Copermittee identify strategies for over-irrigation prohibition in the WQIP?	Yes	No Action
16	Does the Copermittee have a numeric goal or strategy in the accepted WQIP(s) to address pollutant reduction through prohibition of over-irrigation?	Yes	No Action

No.	Audit Question	Audit Key Findings	City Response/ Actions
17	Does the Copermittee identify over-irrigation strategies to address the HPWQC, PWQC, or persistent dry weather flow from the MS4?	Yes	No Action
18	Does the Copermittee actively and effectively implement the over-irrigation strategies to address HPWQCs, PWQCs, or persistent dry weather flow from the MS4?	No <ul style="list-style-type: none"> • “The City relies heavily on non-structural BMP strategies to address or attain committed pollutant load reductions for nutrients and bacteria or reduction of persistent dry weather flows at outfalls.” • “However, the City’s public education and outreach program on its webpages are inconsistent and do not reflect actual implementation of strategies to address flow in watershed residential areas.” 	The SWD and Think Blue websites has been updated to include more information about over-irrigation prohibitions. This includes the Code Enforcement and discharge reporting sections.
19	Did the Copermittee update the JRMP in accordance with II.F.2.a?	Yes	No Action
20	Does the Copermittee identify minimum BMPs for over-irrigation prohibition in the JMRP?	Yes	No Action
21	Did the Copermittee identify and implement the WQIP strategies in the JRMP to address persistent dry weather flow and the over-irrigation prohibition?	No <ul style="list-style-type: none"> • “The JRMP does not address coordination with City Water Department to eliminate dry-weather flows or over-irrigation. The JRMP relies on the Think Blue program to reach targeted audiences for its public education and outreach. However, there is a disconnect between the WQIP strategies, and how the City actually implements the strategies on the City website.” 	SWD added language to the JRMP and website to clearly identify coordination between Storm Water Division and PUD Water Conservation section for over-irrigation prohibition.