

**Santa Margarita River Watershed Management Area
2019-2020 Water Quality Improvement Plan
Annual Report
January 2021**

**APPENDIX 2
Jurisdictional Runoff Management Program
Information**

**APPENDIX 2 JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM
INFORMATION**

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2A	Public Education and Outreach Activities Report, 2019-2020 Annual Report
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APPENDIX 2 – JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM INFORMATION

1 JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM INFORMATION

The following sections present agency-specific information for the Santa Margarita River (SMR) Watershed Management Area (WMA), including:

- Jurisdictional Runoff Management Program (JRMP) Annual Reports – the completed JRMP Annual Report form (Attachment D to the Permit), fiscal analysis, and supporting information. Response to program audit letters are included here if the jurisdiction is providing with the annual report.
- Jurisdictional Strategies – tables present the actual and planned jurisdictional strategies utilized by the Copermittees in the SMR WMA to address the highest priority water quality condition (HPWQC) (i.e., eutrophication and nutrient loading). Information is provided about the following types of strategies:
 - Jurisdictional, or JRMP, strategies: strategies that individual jurisdictions have committed to implement within their jurisdictions. These strategies generally correspond to the JRMP requirements of the MS4 Permit (Provision E).
 - Jurisdictional, or JRMP, optional strategies: strategies that are not strictly required by the MS4 Permit but which jurisdictions identified to help meet WQIP goals. Optional JRMP strategies may be planned, meaning a jurisdiction has decided to implement them, or their implementation may be conditional on certain "triggers. " In the case of optional strategies that must be triggered, jurisdictions only plan to implement these strategies when certain conditions are met, and the strategy then becomes "triggered." Triggers vary by strategy and are detailed in the strategy tables.
 - Watershed, or WMA, strategies: strategies that apply across the WMA and involve multiple jurisdictions. In some cases these strategies also are conditional and are only implemented when triggered. When triggers apply, they are detailed in the individual strategy descriptions.

Some tables use the following symbols:

- = full strategy implementation
- ◐ = partial strategy implementation
- ✕ = no strategy implementation
- NA = not applicable for the reporting period
- NT = strategy was not triggered for implementation

Modified strategies – Strategies that have been modified are designated using "track changes" showing additions (underlined) and removals (~~strikeouts~~) of text and an explanation is provided in the "Rationale for Modification to the Strategy" column. New strategies are added as appropriate and are **red**.

- Modifications to the WQMP/BMP Design Manual – The District incorporated the Water Quality Management Plan (WQMP) into their BMP Design Manual as an appendix. However, some jurisdictions continue to refer to their WQMP and BMP Design Manual as separate manuals. Any updates to any of these manuals are submitted within this section, as applicable. Future updates will be included in this section in future WQIP Annual Reports, when applicable.
- Modifications to the JRMP – Itemized in this section or may be provided as an attachment to the JRMP Annual Report.
- Correspondence regarding Compliance during the Covid-19 Pandemic – includes letters that were sent to the San Diego Water Board and letter responses from the San Diego Water Board, if received.

2 CITY OF MURRIETA

2.1 JRMP ANNUAL REPORT

**JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM
ANNUAL REPORT FORM**

FY 2019/2020

I. COPERMITTEE INFORMATION		
Copermittee Name: CITY OF MURRIETA		
Copermittee Primary Contact Name: BOB MOEHLING		
Copermittee Primary Contact Information:		
Address: 1 TOWN SQUARE		
City: MURRIETA	County: RIVERSIDE	State: CA Zip: 92562
Telephone: 951-461-6036	Fax: 951-461-6049	Email: BMOEHLING@MURRIETACA.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 <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 <input type="checkbox"/>	NO <input checked="" 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 type="checkbox"/>	NO <input type="checkbox"/>
IV. ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM		
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? ** See attachment.	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public		33
Number of non-storm water discharges detected by Copermittee staff or contractors		1
Number of non-storm water discharges investigated by the Copermittee		34
Number of sources of non-storm water discharges identified		34
Number of non-storm water discharges eliminated		31
Number of sources of illicit discharges or connections identified		0
Number of illicit discharges or connections eliminated		0
Number of enforcement actions issued		27
Number of escalated enforcement actions issued		2
V. DEVELOPMENT PLANNING PROGRAM		
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001? ** See attachment.	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Was an update to the BMP Design Manual required or recommended by the San Diego Water Board?	YES <input type="checkbox"/>	NO <input checked="" 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 <input type="checkbox"/>	NO <input type="checkbox"/>
Number of proposed development projects in review		59
Number of Priority Development Projects in review		52
Number of Priority Development Projects approved		12
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		0
Number of completed Priority Development Projects in inventory		72
Number of high priority Priority Development Project structural BMP inspections		21
Number of Priority Development Project structural BMP violations		0

**JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM
ANNUAL REPORT FORM**

Number of enforcement actions issued	0
Number of escalated enforcement actions issued	0

FY 2019/2020

VI. CONSTRUCTION MANAGEMENT PROGRAM

Has the Copermittee implemented a construction management program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Number of construction sites in inventory	32	
Number of active construction sites in inventory	32	
Number of inactive construction sites in inventory	0	
Number of construction sites closed/completed during reporting period	0	
Number of construction site inspections	105	
Number of construction site violations	384	
Number of enforcement actions issued	7	
Number of escalated enforcement actions issued	6	

VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM

Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001? ** See attachment.	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>		
	Municipal	Commercial	Industrial	Residential
Number of facilities or areas in inventory	95	617	6	9
Number of existing development inspections	372	27	0	9
Number of follow-up inspections	0	0	0	0
Number of violations	0	0	0	0
Number of enforcement actions issued	0	0	0	0
Number of escalated enforcement actions issued	0	0	0	0

VIII. PUBLIC EDUCATION AND PARTICIPATION

Has the Copermittee implemented a public education program component that complies with Order No. R9-2013-0001?	YES <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 <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 <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
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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.

Bob Moehling

Signature

BOB MOEHLING

Print Name

951-461-6036

Telephone Number

12/17/20

Date

DIRECTOR OF PUBLIC WORKS / CITY ENGINEER

Title

BMOEHLING@MURRIETACA.GOV

Email

JRMP Annual Report – Attachment

IV. Illicit Discharge Detection and Elimination (IDDE) Program –

As an improvement to the existing IDDE program and to address the recent IDDE audit, the City is in the process of developing an updated IDDE implementation plan that includes a website update to consolidate and streamline the City's water quality page; additional training for code enforcement staff; develop the complaint and enforcement workflow; aggregate and print public education materials; and update the JRMP to document the IDDE / over-irrigation enforcement response plan. Please note, all inspections will be conducted in accordance with the City's COVID-19 implementation plan as outlined in the June 24, 2020 letter to the San Diego Water Board.

V. Development Planning Program –

The City has prescribed BMP requirements on development projects in accordance with the Regional MS4 Permit. The City has also increased development planning inspections through self-certification and direct inspection methods. To streamline and minimize time required for inspection activities, the City will be implementing cloud-based software to more effectively manage compliance activities. Please note, all inspections will be conducted in accordance with the City's COVID-19 implementation plan as outlined in the June 24, 2020 letter to the San Diego Water Board.

VII. Existing Development Management Program –

The City has increased commercial inspections and fulfilled requirements to the maximum extent possible with current resources. To streamline and minimize time required for inspection activities, the City will be implementing cloud-based software to more effectively manage compliance activities. As more resources become available, the City will increase inspections to fulfill the inspection requirements to the maximum extent possible. Please note, all inspections will be conducted in accordance with the City's COVID-19 implementation plan as outlined in the June 24, 2020 letter to the San Diego Water Board.

FISCAL ANALYSIS

- 1) The following table provides estimated expenditures for the preceding, current and next reporting period (FY 2018-19, FY 2019-20 and FY 2020-21, respectively). This table identifies the expenditures (such as capital, operation and maintenance, education, and administrative expenditures) necessary to accomplish the activities described in the City of Murrieta JRMP as required under Section H.2 of the 2010 SMR MS4 Permit.

Program Element	Fiscal Year 2018-2019 (Estimated Actual)		Fiscal Year 2019-2020 (Estimated Actual)		Fiscal Year 2020-2021 (Projected)	
	Capital Expenditures	O&M/Admin Expenditures	Capital Expenditures	O&M/Admin Expenditures	Capital Expenditures	O&M/Admin Expenditures
Program Management		\$126,188		\$168,251		\$173,101
Annual Fee for MS4 NPDES Permit		\$58,373		\$66,351		\$66,351
Implementation Agreement Shared Cost		\$376,442		\$219,137		\$611,594
Construction Inspections		\$124,800		\$101,329		\$199,680
Development Planning		\$246,958		\$320,274		\$311,251
Industrial and Commercial Inspections		\$0		\$20,220		\$37,440
Illicit Connections & Illegal Discharges Program		\$7,143		\$7,143		\$19,623
Municipal Facilities and Activities		\$60,349		\$56,217		\$67,000
Public Education & Outreach		Included in IA Shared Cost		Included in IA Shared Cost		Included in IA Shared Cost
Monitoring Program		Included in IA Shared Cost		Included in IA Shared Cost		Included in IA Shared Cost
Retrofit Program		\$0		\$0		\$0

FISCAL ANALYSIS

Other (Audit, legal, contingency, office supplies, training & development, IT services, liability & property insurance charges)		\$13,845		\$4,820		\$13,700
Total		\$1,014,098		\$963,742		\$1,499,740

FISCAL ANALYSIS

2) A description of the source(s) of funds that are proposed to meet the necessary expenditures for the subsequent year.

Source of Funds	Capital Expenditures	Percent of Total Program Funding	Restrictions on Use (if applicable)
CSA 152		32% - \$480,000	
General Fund		68% - \$1,019,740	

3) Provide a narrative description of circumstances resulting in a 25 percent or greater annual change for any budget line item.

Implementation Agreement Shared Cost: Increases in cost for the NPDES Permit administration, public education and outreach, NPDES training programs, Water Quality Monitoring program and TMDL program.

Construction Inspections: Retirement of staff resulted in additional staff hired to complete inspections.

Development Planning: Retirement of staff resulted in additional transitional staff to meet development requirements.

Industrial / Commercial: Additional staff time allocated to complete required commercial / industrial inspections.

Illicit Connections & Illegal Discharges: Additional staff time anticipated to enforce over-irrigation incidents.

Other: Includes audit, contingency, maintenance supplies, training and development and liability and property insurance.

2.2 STRATEGIES

Table A2-1. City of Murrieta, Illicit Discharge Detection and Elimination Program Strategies

Number	Santa Margarita River Illicit Discharge Detection and Elimination Program Strategies - City of Murrieta	FY19-20	Planned FY20-21	Actual/ Planned	Rationale for Modification to the Strategy	Comments
IDDE-1	Enhanced municipal training programs and curriculum targeting key field staff. Programs will focus on the water quality improvement plan, HPWQC, NNE requirements as related to illicit discharges and elimination of dry weather flows.	●	●	A		<ul style="list-style-type: none"> Due to COVID-19, key City field staff will attend enhanced municipal online training program in fall of 2020. The District has developed the training curriculum and will administer the training. City has selected cloud-based software to manage storm water compliance activities and data. Software training will begin in FY 20-21.
IDDE-3	Plot IDDE incidents in GIS to identify clusters where community outreach and workshops would be effective in eliminating dry weather flows. Data and Storm Water Compliance Management – use of CloudCompli software to manage all programs: construction, post construction BMP (WQMP), commercial, industrial, IDDE and municipal.	●	●	A	Improved storm water compliance management	<ul style="list-style-type: none"> City has selected cloud-based software to manage storm water compliance activities and data. Onboarding and implementation will begin in FY 20-21. This strategy will be used for IDDE and for other programs as well.
IDDE-4	Prepare draft IDDE implementation plan to update and improve the program.	●	●	A	Strategy in response to IDDE audit	<ul style="list-style-type: none"> In response to the 2018 IDDE audit, the City has prepared a draft IDDE implementation plan to improve the program. The program updates include updating the City's water quality website, improving coordination with City departments to receive, investigate and enforce IDDE incidents, training for enforcement staff, and review and refinement of IDDE enforcement response plan to include over-irrigation.

Table A2-1. City of Murrieta, Illicit Discharge Detection and Elimination Program Strategies

Number	Santa Margarita River Illicit Discharge Detection and Elimination Program Strategies - City of Murrieta	FY19-20	Planned FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
IDDE-5	Provide notification letter and public information to master HOA located tributary to NAL exceedance outfall	◐	●	A	Strategy in response to NAL exceedance	<ul style="list-style-type: none"> The letter will notify the master HOA of the exceedance and the potential sources for the exceedance. In addition to the letter, the City provided public education materials on over-irrigation, gardening and landscaping and pet waste.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-2. City of Murrieta, Development Planning Program Strategies

Number	Santa Margarita River Development Planning Program Strategies - City of Murrieta	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
DEV-1	Smart irrigation conditions of approval Require Developer to design and install irrigation systems so runoff does not discharge into the street or storm drain system.	●	●	A	Clarification	<ul style="list-style-type: none"> Strategy is ongoing
DEV-2	BMP Design Manual Training	◐	◐	A		<ul style="list-style-type: none"> Due to COVID-19, previously scheduled BMP Design Manual Training is postponed until further notice.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-3. City of Murrieta, Construction Management Program Strategies

Number	Santa Margarita River Construction Management Program Strategies - City of Murrieta	FY19-20	Planned FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
CON-1	Provide inspection staff training related to construction storm water management	◐	●	A		<ul style="list-style-type: none"> Due to COVID-19, City staff will attend construction storm water management online training in fall of 2020. The District has developed the training and will administer the training.
CON-2	Provide informational letter to responsible parties prior to start of rainy season inspections to ensure BMPs are adequately implemented.	●	●	A	Added new strategy to reflect current program efforts	<ul style="list-style-type: none"> City inspector provided informational letter and additional education to contractors and other responsible parties on compliance areas that require attention.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-4. City of Murrieta, Existing Development Management Program Strategies

Number	Santa Margarita River Existing Development Management Program Strategies City of Murrieta	FY19-20	Planned FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
ED-2	Increase inspection frequencies at facilities identified on Copermittee inventories to be sources of nutrients	X	X	NT		<ul style="list-style-type: none"> Implementation to start in FY 2022
ED-3	Enhance commercial / industrial / municipal inspections programs to focus on irrigation systems.	X	◐	P		<ul style="list-style-type: none"> Planning for focused irrigation system inspections for commercial / industrial / municipal will begin in FY 2021.
ED-4	Enhance residential inspections programs to focus on over-irrigation.	X	◐	P		<ul style="list-style-type: none"> Planning for focused residential irrigation inspections will begin in FY 2021.
ED-6	Enhanced municipal training programs and curriculum targeting inspections staff. Programs will focus on the water quality improvement plan, HPWQC, NNE requirements as related to the inspections programs and specific nutrient issues.	◐	●	A		<ul style="list-style-type: none"> City inspection staff will attend the online enhanced commercial and industrial training program in fall of 2020. The District has developed the training curriculum and will administer the training.
ED-7	Enhanced enforcement program targeting identified, problematic, sources of nutrients	X	X	NT		<ul style="list-style-type: none"> Implementation to start in FY 2022
ED-8	Coordination with EVMWD to distribute public education materials.	X	◐	A	Added strategy to provide public education to residents	<ul style="list-style-type: none"> EVMWD will be distributing public education materials on over-irrigation and reducing pollutants in the watershed to residents served by this water district.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-5. City of Murrieta, Enforcement Response Plans Program Strategies

Number	Santa Margarita River Enforcement Response Plans Program Strategies City of Murrieta	FY19-20	Planned FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
ERP-1	Implement escalating enforcement responses to compel compliance with statutes, ordinances, permits, contracts, orders, and other requirements for IDDE, development planning, construction management, and existing development in the Enforcement Response Plan.	●	●	A		Escalating enforcement responses are implemented as deficiencies are identified.

Notes:

● - Fully implemented; ● - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-6. City of Murrieta, Public Education and Participation Program Strategies

Number	Santa Margarita River Public Education and Participation Program Strategies City of Murrieta	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
PubEd-2	Enhanced outreach programs targeting homeowner's associations/residential communities.	X	X	NT		<ul style="list-style-type: none"> Implementation to start in FY 2023

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-7. City of Murrieta, Optional Jurisdictional Strategies

Number	Santa Margarita River Optional Jurisdictional Strategies City of Murrieta	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
OPT-1	Water District Coordination - Coordination with Water Districts to pinpoint problem sources of dry weather flows.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020
OPT-2	Water District Coordination - Coordination with Water Districts on inspection and enforcement efforts.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020
OPT-3	Establish semiannual meetings among Engineering and Community Services District to evaluate opportunities for improving water quality at MS4s, streets, parking lots, parks and other landscaped areas.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020
OPT-4	Establish semiannual meetings to discuss potential ordinance changes.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020
OPT-4	Establish semiannual meetings among CIP staff to identify opportunities to rehabilitate channels or habitats.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-8. City of Murrieta, Optional WMA Strategies

Number	Santa Margarita River Optional WMA Strategies City of Murrieta	FY18-19	FY19-20	Actual / Planned	Rationale for Modification to the Strategy	Comments
OPT-6	Partner with Water Districts to implement incentive program.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020
OPT-7	Regional inspector to inspect areas watershed-wide for anthropogenic sources of dry weather flows.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

2.3 MODIFICATIONS TO WQMP

Modifications to the WQMP were made during FY 2017-2018. The current WQMP went into effect on July 5th, 2018. No modifications to the WQMP were made during the reporting period. The current City of Murrieta WQMP is posted on the City's website.

2.4 MODIFICATIONS TO THE JRMP

No modifications to the City of Murrieta's JRMP have been made since the WQIP was approved. The City's current JRMP is posted on the City's website.

2.5 CORRESPONDENCE REGARDING COMPLIANCE DURING THE COVID-19 PANDEMIC

The City of Murrieta sent a letter to the San Diego Water Board describing the impacts of the COVID-19 pandemic and associated public health orders on its stormwater program. The City's letter is provided in this section. No response was received from the San Diego Water Board.



CITY OF MURRIETA

June 24, 2020

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

Attn: Laurie Walsh, PE Storm Water Management Unit

SUBJECT: Compliance with Water Board Requirements During COVID-19

Dear Mr. Gibson:

On March 20, 2020, the San Diego Water Board (Water Board) and the State Water Resources Control Board (State Board) provided a notice, "Compliance with Water Board Requirements during the Coronavirus 2019 (COVID-19) Emergency (COVID-19 Notice), detailing how MS4 permittees were to advise the Water Boards concerning potential non-compliance with the MS4 permit and other order requirements due to the COVID-19 public health emergency. In accordance with that notice, this letter provides the City's assessment regarding compliance with the above-referenced MS4 permit and related orders.

This letter responds to the following Water Board COVID-19 Notice requirement:

If there is a specific Water Board order or requirement that cannot be timely met because it would be inconsistent with current governmental directives or guidelines related to COVID-19, the entity responsible for compliance with the Water Board order or requirement must notify the applicable Water Board immediately. The notification shall be via electronic mail to the applicable Water Board using the appropriate email address identified below and shall include:

- *the specific Water Board order, regulation, permit or other requirement that cannot be timely met;*
- *the inconsistent COVID-19 directive or guideline;*
- *an explanation of why the responsible entity cannot timely meet the Water Board order or requirement; and*
- *any action that the entity will take in lieu of complying with the specific Water Board order or requirement*

The City is enrolled under the National Pollutant Discharge Elimination (NPDES) Permit and Waste Discharge Requirements for Discharges from Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds within the San Diego Region, San Diego Regional Water Quality Control Board Order No. R9-2015-0010 as amended by Order Nos. R9-2013-0001 and R9-2015-0001 (MS4 Permit) and the Water



CITY OF MURRIETA

Quality Improvement Monitoring and Assessment Program for Eutrophic Conditions in the Santa Margarita River Estuary and Watershed, Investigative Order No. R9-2019-0007 (Investigative Order). The City has reviewed its requirements under the MS4 Permit and the Investigative Order and has evaluated its ability to comply with those requirements. Under current conditions, the City expects to comply with the requirements of the MS4 Permit and the Investigative Order except for the proposed modifications noted in this letter.

COVID-19 Restrictions:

The City has heeded the public health directives and guidance related to COVID-19. These directives present some challenges to comply with some water quality requirements. The City will strive to comply with the water quality requirements to the extent possible while also heeding the COVID-19 directives.

The directives and guidelines that affect compliance with the water quality requirements are:

- Centers for Disease Control and Prevention (CDC) Social Distancing Guidelines
- Riverside County Public Health Order, March 13 – Schools Closed to Avoid Potential COVID-19 Exposure
- Riverside County Public Health Order, March 18 – Closing All Schools from March 16, 2020 through April 30, 2020
- Governor’s March 19, 2020, Executive Order N-33-20 (Stay at Home Order);
- U.S. Department of Homeland Security’s “Identifying Critical Infrastructure During COVID-19” (CISA Critical Infrastructure)
- Riverside County Public Health Order, April 4 – Extends School Closure Order to June 19
- Governor’s Updated Industry Guidance
- City Vehicle Usage Guidelines

MS4 Permit Provisions Affected by Referenced COVID-19 Restrictions:

Provision E.3 – Development Planning

- **Specific Water Board Requirement that Cannot Be Timely Met:**

E.3.e.3.a, b and c: Verification through inspections, self-certifications, surveys, or other equally effective approaches and appropriate follow up measures (including re-inspections, enforcement, etc.) to ensure that BMPs on each Priority Development Project (PDP) are adequately maintained and continue to operate effectively to remove pollutants in storm water to the MEP. All high priority structural BMPs at Priority Development Project sites are to be inspected directly annually prior to each rainy season.



CITY OF MURRIETA

- **Explanation of why the responsible entity cannot timely meet the Water Board order or requirement:**

The City is required to directly inspect all high priority sites prior to each rainy season (October 1) and the remaining sites annually. Due to the referenced directives, many PDP sites may have experienced closures for several months and access to the BMPs has been limited, thereby limiting inspections conducted. At this time, inspections have resumed as the re-opening of PDP sites have begun. While inspections may resume, it is anticipated that the inspection process, including follow up and enforcement actions, may be delayed due to potential PDP site operational changes. As a result, the required inspections may not be completed within the timeframes required.

- **Any action that the entity will take in lieu of complying with specific Water Board order or requirement:**

The City has completed inspections of high priority PDP sites. The City will continue to inspect medium priority PDP sites. Self-certification letters have been sent to the low priority PDP sites. Inspections completed within the FY 19-20 annual reporting year will be documented within the FY 19-20 annual report. Inspections completed within FY 20-21 will be documented in the FY 20-21 annual report.

Provision E.5 – Existing Development

- **Specific Water Board Requirement(s) that Cannot Be Timely Met:**

E.5.b.1.c.ii. – Implementation of operation and maintenance activities for its MS4 and related structures (including but not limited to catch basins, storm drain inlets, detention basins, etc.) and verify the proper operation of all its municipal structural treatment controls designed to reduce pollutants. Operation and maintenance activities may include inspections, cleaning and proper disposal of materials removed from the cleaning of MS4 and related structures.

E.5.c.1.a.i., E.5.c.b. – Conduct inspections of inventoried existing developments. Existing developments must be inspected once every five years utilizing drive-by, onsite or visual inspections. Based on inspection findings, follow up actions, including education and outreach, re-inspection and enforcement actions must be taken.



CITY OF MURRIETA

- **Explanation of why the responsible entity cannot timely meet the Water Board order or requirement:**

E.5.b.1.c.ii. –The cleaning of catch basins and associated structures requires a two-person crew to safely set up the work area and effectively perform maintenance activities. Maintenance activities involve working closely together to operate maintenance equipment. Due to social distancing guidelines, crew members will not be able to work closely together to complete the maintenance tasks. Additionally, City maintenance staff is further limited by City guidance requiring that one employee occupy each vehicle at any given time. This further limits maintenance activities since vehicles are prioritized for higher priority essential City maintenance work.

E.5.c.1.a.i., E.5.c.b. – The City is required to inspect inventoried existing development once every five years and take any necessary follow up actions as necessary. Due to the referenced COVID-19 directives, many existing commercial and industrial sites have experienced closures. The City is now resuming inspection of sites previously closed. Although commercial and industrial sites are re-opening, it is anticipated that the inspection process, including follow up and enforcement actions, may be delayed due to potential commercial and industrial site operational changes. As a result, the required inspections may not be completed within the timeframes required.

- **Any action that the entity will take in lieu of complying with specific Water Board order or requirement:**

E.5.b.1.c.ii. – The City will resume maintenance activities once the social distancing guidelines have been lifted. All maintenance activity conducted will be reported in the annual reporting year in which the activity is completed.

E.5.c.1.a.i., E.5.c.b. – The City will continue to conduct commercial and industrial inspections. Inspections completed within the FY 19-20 annual reporting year will be documented in the FY 19-20 annual report. Inspections completed within the FY 20-21 annual reporting cycle will be documented in the FY 20-21 annual report.

Provision E.7 – Public Education and Participation

On April 8, 2020, the Riverside County Flood Control and Water Conservation District (District) submitted a letter detailing COVID-19 impacts on watershed-wide public education and public participation efforts implemented by the District on behalf of the Riverside County MS4 Copermittees.



CITY OF MURRIETA

On June 15, 2020, the San Diego Regional Board issued a letter to the District indicating that public education and public participation requirements of provision E.7 implemented by the District pertaining to in-person activities that are incompatible with Governor Newsom's Executive Order N-33-20 or Riverside County Public Health Officer are suspended.

Investigative Order Requirements Affected by COVID-19 Restrictions:

On April 8, 2020, the Marine Corps Installations West-Marine Corps Base Camp Pendleton (MCIWEST-MCB CPEN) submitted a letter notifying the Water Board of COVID-19 Public Health Emergency impacts to monitoring and assessment pursuant to the Investigative Order. The District submitted an email to the Water Board on behalf of the Riverside County MS4 Copermittees in support of the letter submitted by MCIWEST-MCB CPEN.

On May 11, 2020, the City received notification from the Water Board that the temporary modifications proposed in the April 8, 2020 letter has been approved.

Other Factors that Will Impact the City's Water Quality Program:

The COVID-19 public health emergency remains to be a fluid situation. The above proposed changes may need to be re-evaluated if new directives are issued or if staff changes related to COVID-19 affect the ability to meet water quality requirements.

Additionally, the COVID-19 public health emergency will have a significant impact on the City's economy and effectively, a significant impact on the City's operating budget. When it is determined how the City's operating budget is impacted, the City will re-evaluate its ability to meet the water quality requirements and update the Water Board accordingly.

The City remains committed to meeting the Water Board issued requirements to the extent possible, while also maintaining the safety of its City staff. The City appreciates the Water Board's consideration in the acceptance of the proposed referenced changes.

If you have any questions, please contact Ms. Mai Son at 951.461.6085 or email at mson@murrietaca.gov, or me at 951.461.6036 or email at bmoehling@murrietaca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. K. Moehling".

Robert K. Moehling, P.E.
Director of Public Works / City Engineer

3 CITY OF TEMECULA

3.1 JRMP ANNUAL REPORT

**JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM
ANNUAL REPORT FORM**

FY 2019/2020

I. COPERMITTEE INFORMATION	
Copermittee Name: City of Temecula	
Copermittee Primary Contact Name: Patrick Thomas, Public Works Director	
Copermittee Primary Contact Information: Address: 41000 Main Street	
City: Temecula	County: Riverside
Telephone: 951-694-6444	Fax: 951-694-6475
State: Ca.	Zip: 92590
Email: Patrick.Thomas@TemeculaCA.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 <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 <input type="checkbox"/> NO <input checked="" 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 type="checkbox"/> NO <input type="checkbox"/>
IV. ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM	
Has the Copermittee implemented a program to actively detect and eliminate illicit discharges and connections to its MS4 that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public	17
Number of non-storm water discharges detected by Copermittee staff or contractors	53
Number of non-storm water discharges investigated by the Copermittee	53
Number of sources of non-storm water discharges identified	30
Number of non-storm water discharges eliminated	30
Number of sources of illicit discharges or connections identified	30
Number of illicit discharges or connections eliminated	30
Number of enforcement actions issued	0
Number of escalated enforcement actions issued	0
V. DEVELOPMENT PLANNING PROGRAM	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Was an update to the BMP Design Manual required or recommended by the San Diego Water Board?	YES <input type="checkbox"/> NO <input checked="" 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 <input type="checkbox"/> NO <input type="checkbox"/>
Number of proposed development projects in review	767
Number of Priority Development Projects in review	14
Number of Priority Development Projects approved	5
Number of approved Priority Development Projects exempt from any BMP requirements	0
Number of approved Priority Development Projects allowed alternative compliance	1
Number of Priority Development Projects granted occupancy	0
Number of completed Priority Development Projects in inventory	155
Number of high priority Priority Development Project structural BMP inspections	9
Number of Priority Development Project structural BMP violations	7
Number of enforcement actions issued	0
Number of escalated enforcement actions issued	0

**JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM
ANNUAL REPORT FORM**

FY 2019/2020

VI. CONSTRUCTION MANAGEMENT PROGRAM

Has the Copermittee implemented a construction management program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Number of construction sites in inventory	94	
Number of active construction sites in inventory	94	
Number of inactive construction sites in inventory	0	
Number of construction sites closed/completed during reporting period	35	
Number of construction site inspections	332	
Number of construction site violations	44	
Number of enforcement actions issued	44	
Number of escalated enforcement actions issued	15	

VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM

Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>		
	Municipal	Commercial	Industrial	Residential
Number of facilities or areas in inventory	251	3667	93	129
Number of existing development inspections	251	528	13	97
Number of follow-up inspections	0	14	0	0
Number of violations	0	14	0	0
Number of enforcement actions issued	0	14	0	0
Number of escalated enforcement actions issued	0	0	0	0

VIII. PUBLIC EDUCATION AND PARTICIPATION


Has the Copermittee implemented a public education program component that complies with Order No. R9-2013-0001?	YES <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 <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 <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
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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

PATRICK THOMAS
Print Name

951-694-6411
Telephone Number

01/28/2021
Date

DIRECTOR OF PUBLIC WORKS
Title

PATRICK.THOMAS@TEMECULACA.GOV
Email

FISCAL ANALYSIS

- 1) The following table provides estimated expenditures for the current reporting period, the preceding reporting period, and the next reporting period. This table identifies the expenditures (such as capital, operation and maintenance, education, and administrative expenditures) necessary to accomplish the activities described in the City of Temecula JRMP as required under Section H.2 of the 2010 SMR MS4 Permit.

Program Element	Fiscal Year 2020-2021		Fiscal Year 2019-2020		Fiscal Year 2018-2019	
	Capital Expenditures	O&M/Admin Expenditures	Capital Expenditures	O&M/Admin Expenditures	Capital Expenditures	O&M/Admin Expenditures
Program Management		\$ 190,889		\$174,307		\$162,424
Annual Fee for MS4 NPDES Permit		\$40,800		\$35,837		\$35,795
Implementation Agreement Shared Cost		\$639,484		\$236,128		\$407,047
Construction Inspections		\$60,000		\$54,035		\$50,351
Development Planning		\$40,000		\$34,861		\$32,485
Industrial and Commercial Inspections		\$30,000		\$18,289		\$15,000
Illicit Connections & Illegal Discharges Program		\$10,000		\$0		\$0
Municipal Facilities and Activities		\$154,000		\$127,145		\$111,220
Public Education & Outreach		\$0		\$0		\$0
Monitoring Program		\$0		\$0		\$0
Retrofit Program		\$0		\$0		\$0
Other		\$10,000		\$10,000		\$10,000
Total		\$1,175,173		\$690,602		\$824,322

FISCAL ANALYSIS

2) A description of the source(s) of funds that are proposed to meet the necessary expenditures for the subsequent year.

Source of Funds	Capital Expenditures	Percent of Total Program Funding	Restrictions on Use (if applicable)
General Fund	\$690,602	93%	General Fund is used to fund other departments and divisions
WQMP Plan Check and Construction Inspection Fees	\$22,743	3%	Combination of fixed fees (based on project size) and fixed percentages (based on project engineers cost estimate).
ESC Plan Check and Construction Inspection Fees	\$28,760	4%	Fixed percentage based upon project's engineering cost estimate.
Citations	\$2,300	<1%	No legal restrictions

3) Provide a narrative description of circumstances resulting in a 25 percent or greater annual change for any budget line item.

The City's General Fund continues to fund the majority of the NPDES program. The WQMP, ESC, and citation categories maintained similar revenue due to a similar level of newly conditioned developments that were issued grading permits during this reporting period.

3.2 STRATEGIES

Table A2-9. City of Temecula, Illicit Discharge Detection and Elimination Program Strategies

Number	Santa Margarita River Illicit Discharge Detection and Elimination Program Strategies - City of Temecula	FY18-19	FY19-20	Actual / Planned	Rationale for Modification to the Strategy	Comments
IDDE-1	Update ordinances to reflect current illicit discharge and connections requirements and strategies to reduce non-stormwater discharges to the MS4 during dry and wet weather.	◐	●	A		<ul style="list-style-type: none"> Revised Ordinances have been Drafted Ordinances have been updated and approved by City Council
IDDE-2	Post signage adjacent to open channels providing information to report any observed illicit discharges. Signage will focus on sources of non-stormwater discharges such as illegal dumping and over-irrigation.	◐	◐	P		<ul style="list-style-type: none"> City has initiated planning and installation of the signs is expected to start in FY 21-22
IDDE-3	Responsible Compassion for the Homeless Program will be implemented to address homeless problems throughout the City, thereby reducing their impacts on water quality through trash, illegal dumping, and direct discharge of human waste.	●	●	A		<ul style="list-style-type: none"> Four full time City staff are assigned to Responsible Compassion for the Homeless Program

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-10. City of Temecula, Development Planning Program Strategies

Number	Santa Margarita River Development Planning Program Strategies City of Temecula	FY18-19	FY19-20	Actual / Planned	Rationale for Modification to the Strategy	Comments
DEV-1	Modified Low Impact Development requirements for new and redevelopment to specifically address nutrients during dry and wet weather through increased use of disconnected impervious surfaces, on-site retention of dry weather flows, and treatment of stormwater prior to discharge.	X	X	A		<ul style="list-style-type: none"> City staff reviewed the LID standards in the BMP Design Manual and determined the existing language of the 2018 BMP Design Manual provides sufficient authority to address sources of nutrients. City staff will ensure that the review process address these sources, but changes to the manual itself were not determined to be necessary
DEV-2	Amend BMP design manuals to address sources of HPWQCs and PWQCs on new and redevelopment projects (e.g., irrigation design standards, LID implementation) and conduct internal staff training on updated BMP design manual	X	X	P		<ul style="list-style-type: none"> Implementation was not due to start in FY18-19 per WQIP As noted in comments for DEV-1 above the City has determined changes to the BMP Design Manual to address sources of nutrients are not necessary at this time. Changes are not planned for FY19-20. City staff that review WQMPs have been trained on how to ensure WQMP submittals propose BMPs to address sources of nutrients. City staff compiled clarifying edits to the WQMP throughout FY19-20. An updated BMP manual is planned to be available online in FY20-21.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-11. City of Temecula, Construction Management Program Strategies

Number	Santa Margarita River Construction Management Program Strategies - City of Temecula	FY18-19	FY19-20	Actual / Planned	Rationale for Modification to the Strategy	Comments
CON-1	Require implementation of BMPs that reduce the potential of HPWQC and PWQC loading, that are site specific and appropriate to the construction phase, year round.	●	●	A		<ul style="list-style-type: none"> Strategy is ongoing as part of the JRMP Construction Management Program
CON-2	Where former agricultural lands are issued grading permits for development/ redevelopment, the sites will be deemed high priority for BMP implementation and inspection in accordance with the City's JRMP.	●	●	A		<ul style="list-style-type: none"> Former agricultural lands are deemed high priority, regardless of other factors
CON-3	Impose legal authority to ensure inventoried construction projects are in compliance with all requirements.	●	●	A		<ul style="list-style-type: none"> Strategy is ongoing in accordance with the City's Enforcement Response Plan

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-12. City of Temecula, Existing Development Management Program Strategies

Number	Santa Margarita River Existing Development Management Program Strategies City of Temecula	FY18-19	FY19-20	Actual / Planned	Rationale for Modification to the Strategy	Comments
ED-1	Enhanced municipal training programs and curriculum targeting inspections staff. Programs will focus on specific nutrient related activities that inspectors might encounter in the field such as non-stormwater flows and their sources (e.g., over-irrigation, illegal washing/dumping) and materials storage BMPs (e.g., coverage and containment) within existing development.	●	●	A		<ul style="list-style-type: none"> • Training is conducted on an annual basis • Due to COVID-19 restrictions, in-person trainings were limited in FY19-20. However, virtual trainings (via video conferencing) were provided throughout FY19-20
ED-2	Install weather based irrigation controllers in municipal parks and promote incentive programs elsewhere (as available) to address sources of over-watering and irrigation runoff within existing development.	●	●	A		<ul style="list-style-type: none"> • Weather based irrigation controllers were installed in municipal parks
ED-3	Weekly street sweeping in residential areas to reduce pollutant buildup (e.g., organic debris, trash, metals) on streets and curb/gutter areas, thereby reducing transport of pollutants to the storm drain system via non- stormwater and stormwater flows.	●	●	A		<ul style="list-style-type: none"> • All residential streets are swept the day following trash service day
ED-4	Modify City JRMP to include any Agricultural business operation as a high priority business inspection similar to industrial business. Report any Non-filing businesses to the Regional Board.	●	●	A		<ul style="list-style-type: none"> • Strategy was incorporated into the City Business inspection component

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-13. City of Temecula, Enforcement Response Plans Program Strategies

Number	Santa Margarita River Enforcement Response Plans Program Strategies City of Temecula	FY18-19	FY19-20	Actual / Planned	Rationale for Modification to the Strategy	Comments
ERP-1	Implement escalating enforcement responses to compel compliance with statutes, ordinances, permits, contracts, orders, and other requirements for IDDE, development planning, construction management, and existing development in the Enforcement Response Plan.	●	●	A		<ul style="list-style-type: none"> The City enforces all applicable ordinances using approaches described in the Enforcement Response Plan

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-14. City of Temecula, Public Education and Participation Program Strategies

Number	Santa Margarita River Public Education and Participation Program Strategies City of Temecula	FY18-19	FY19-20	Actual / Planned	Rationale for Modification to the Strategy	Comments
PubEd-1	Enhanced outreach programs targeting homeowners associations to educate homeowners and HOAs about outdoor water usage, the effects of over-irrigation, and specific BMPs they can implement to reduce runoff from over-irrigation.	●	●	A		<ul style="list-style-type: none"> City updated its website and door hangers to address over-irrigation. This information is easily available to HOAs
PubEd-2	Enhanced outreach materials focused on sources of nutrients (e.g., door hangers, pamphlets, other media). Outreach materials will focus on non-stormwater discharges to the storm drain system (e.g., septic system maintenance, equestrian facility BMPs, outdoor water usage, the effects of over-irrigation, and specific BMPs they can implement to reduce runoff from over-irrigation).	●	●	A		<ul style="list-style-type: none"> Over-irrigation door hangers have been developed
PubEd-3	Notify agricultural business license holders within City Jurisdiction of requirement to enroll in the Regional Water Board Agricultural Order.	●	●	A		<ul style="list-style-type: none"> Strategy was incorporated into the City Business inspection component

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-15. City of Temecula, Optional Jurisdictional Strategies

Number	Santa Margarita River Optional Jurisdictional Strategies City of Temecula	FY18-19	FY19-20	Actual / Planned	Rationale for Modification to the Strategy	Comments
OPT-1	Implement Parks Improvement Program that will provide landscaping, irrigation, and on- site drainage improvements that will reduce the potential for pollutant discharges (e.g., irrigation runoff, fertilizer) from municipal parks.	●	●	A		<ul style="list-style-type: none"> Rehabilitation and improvement projects included landscaping and irrigation system efficiency upgrades and on-site drainage improvements.
OPT-2	Flood control channel repair and rehabilitation to prevent erosion and the transport of sediment- bound pollutants.	X	●	A, NT		<ul style="list-style-type: none"> Strategy not triggered in FY19-20 Strategy implemented fully in FY19-20 via collaboration with community, local, and municipal agencies on the Meadow Creek Restoration Project. The City processed permits for and oversees the project. This project is ongoing in FY20-21
OPT-3	Implement dry weather infiltration, diversion to sanitary sewer, to eliminate non- stormwater discharges to the MS4.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY19-20

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

3.3 MODIFICATIONS TO WQMP

Modifications to the WQMP were made during FY 2017-2018 and the current WQMP went into effect on July 5th, 2018. The content of the WQMP has not been updated since FY18; however, edits were made to templates during FY19 and FY20 to make the document more user-friendly. Additional edits to the WQMP are planned to be made in FY20-21. The current City of Temecula WQMP is posted on the City's website.

3.4 MODIFICATIONS TO THE JRMP

The City's current JRMP, which was last updated when the WQIP was approved, is posted on the City's website. The City worked on updates to the JRMP in FY19-20 and plans to publish an updated version in FY20-21. Updates included language regarding over-irrigation prohibitions and references to HPWQCs.

3.5 CORRESPONDENCE REGARDING COMPLIANCE DURING THE COVID-19 PANDEMIC

The City of Temecula sent a letter to the San Diego Water Board describing the impacts of the COVID-19 pandemic and associated public health orders on its stormwater program. The City's letter and the San Diego Water Board's response are provided in this section.

From: Stuart Kuhn
Sent: Monday, May 18, 2020 10:04 AM
To: sandiego@waterboards.ca.gov
Cc: Patrick Thomas; Ron Moreno; 'Laurie.Walsh@waterboards.ca.gov'
Subject: Initial Notification and Preliminary Assessment of Impact of COVID-19 Public Health Emergency on Compliance with San Diego Region NPDES MS4 Permit and Related Orders

Mr. David W. Gibson
Executive Officer
San Diego Regional Water Quality Control Board
2375 Northside Dr., Suite 100
San Diego, CA 92108-0002
Sent via electronic mail: SanDiego@waterboards.ca.gov

Re: Initial Notification and Preliminary Assessment of Impact of COVID-19 Public Health Emergency on Compliance with San Diego Region NPDES Municipal Separate Storm Sewer System (MS4) Permit and Related Orders

Dear Mr. Gibson:

On March 20, 2020, the San Diego Water Board and the State Water Resources Control Board provided a notice, Compliance with Water Board Requirements during the Coronavirus 2019 (COVID-19) Emergency (COVID-19 Notice), detailing how MS4 permittees were to advise the water boards concerning potential non-compliance with MS4 permit and other order requirements due to the COVID-19 public health emergency. In accordance with that notice, this letter provides the initial response of the City of Temecula (City) to this notice, and sets forth the City's preliminary assessment concerning compliance with the above-referenced MS4 permit and related orders.

This letter responds to the following COVID-19 Notice requirement:

"If there is a specific Water Board order or requirement that cannot be timely met because it would be inconsistent with current governmental directives or guidelines related to COVID-19, the entity responsible for compliance with the Water Board order or requirement must notify the applicable Water Board immediately. The notification shall be via electronic mail to the applicable Water Board using the appropriate email address identified below, and shall include:

- the specific Water Board order, regulation, permit, or other requirement that cannot be timely met,
- the inconsistent COVID-19 directive or guideline,
- an explanation of why the responsible entity cannot timely meet the Water Board order or requirement, and
- any action that the entity will take in lieu of complying with the specific Water Board order or requirement."

In recent weeks, in response to the COVID-19 crisis, the Governor and Riverside County have issued several public health orders and City operations have been modified in various ways in response to

those orders, and particularly in response to social distancing requirements. City personnel are continuing to evaluate how the COVID-19 emergency is affecting, and will affect, compliance with the MS4 Permit and other orders. This is a complex evaluation, requiring an assessment not only of City staff capabilities but also those of consultants, laboratories, and other entities. At this time, the City cannot provide the detailed analysis required by the State Board's notice for all affected compliance activities. However, we have identified several MS4 compliance actions that cannot be implemented as scheduled, and these actions are described in detail below. The City expects to provide more detailed information regarding the extent of COVID-19 impacts to MS4 compliance actions in the near future, once we have completed a more detailed analysis.

Status of Riverside County Public Health Orders Concerning COVID-19

In addition to the State of Emergency declared by the Governor on March 4, 2020, and the Governor's Executive Order N-33-20 issued on March 19, 2020, which imposed social distancing measures and directed all individuals in California to stay at their place of residence except as needed to maintain continuity of operations of critical infrastructure sectors, Riverside County health authorities have also issued a number of COVID-19 related orders. On March 8, 2020, the County of Riverside Public Health Officer, Dr. Cameron Kaiser, declared a local health emergency, citing the County's first locally acquired case of COVID-19. Since that time, more than a dozen public health orders have been issued by Dr. Kaiser, including cancellation of public events (March 12), closure of schools (March 13), cancellation of meetings of more than 10 individuals, closure of county buildings to the public (March 17), extending the period of closure for schools and colleges (March 18 and April 1). On April 4, Dr. Kaiser issued a further order with a prohibition on all gatherings, regardless of venue or size with very limited exceptions, a requirement that all persons including essential workers wear face coverings whenever they leave their home, and a commitment from law enforcement to enforce the order. Although Riverside County has begun the process of reopening certain businesses and facilities, this process is expected to proceed slowly and social distancing requirements remain in place. Riverside County COVID-19 Orders can be found at: <https://www.rivcoph.org/coronavirus>.

Notification of City Compliance Activities That Cannot Be Timely Met

As noted above, the City has identified the following activities required under the MS4 Permit, Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2015-0100, which cannot be performed at this time due to the restrictions imposed by the COVID-19 orders referenced above. In accordance with the State Board's COVID-19 policy, we describe below the activities impacted, the respective inconsistent COVID-19 order, an explanation as to why the requirement cannot be timely met, and any planned in-lieu or alternative actions.

- Existing Development Inspections
- the specific Water Board order, regulation, permit, or other requirement that cannot be timely met,
 - o Provision II.E.5.c.(1)(a)(iv); Each Copermittee must annually perform onsite inspections of an equivalent of at least 20 percent of the commercial facilities and areas, industrial facilities, and municipal facilities in its inventoried existing development;
 - o City JRMP: Section 8.4.1: Annually complete a number of onsite inspections equal to 20 percent of the total number of inventoried facilities. If multiple onsite inspections are completed at a facility in a given year, including follow-up inspections or inspections in response to a hotline call, those inspections

may be counted toward the 20 percent requirement. Drive-by inspections, as defined in Section 8.4.3.2, are not counted toward the 20 percent requirement.

- the inconsistent COVID-19 directive or guideline,
 - o State of Emergency declared by the Governor on March 4, 2020;
 - o the Governor's Executive Order N-33-20 issued on March 19, 2020, which imposed social distancing measures and directed all individuals in California to stay at their place of residence except as needed to maintain continuity of operations of critical infrastructure sectors
 - o On March 8, 2020, the County of Riverside Public Health Officer, Dr. Cameron Kaiser, declared a local health emergency, citing the County's first locally acquired case of COVID-19. Since that time, more than a dozen public health orders have been issued by Dr. Kaiser, including cancellation of public events (March 12), closure of schools (March 13), cancellation of meetings of more than 10 individuals, closure of county buildings to the public (March 17), extending the period of closure for schools and colleges (March 18 and April 1). On April 4, Dr. Kaiser issued a further order with a prohibition on all gatherings, regardless of venue or size with very limited exceptions, a requirement that all persons including essential workers wear face coverings whenever they leave their home, and a commitment from law enforcement to enforce the order.
- an explanation of why the responsible entity cannot timely meet the Water Board order or requirement
 - o Many businesses within the City of Temecula have been closed due to the COVID-19 Pandemic.
 - o Businesses that remain open are subject to social distancing and reduced staffing levels.
 - o Onsite inspections cannot be conducted for closed businesses or open businesses when practicing social distancing.
- any action that the entity will take in lieu of complying with the specific Water Board order or requirement.
 - o The City proposes to complete the remainder of 2019/2020 existing development inspections using drive-by inspections.
 - o The City requests an extension of time from June 30th 2020 to September 30th 2020 to complete its 2019/2020 existing development inspections.
 - o The City will continue to fully implement its IDDE program and respond to all reports of stormwater violations.

This information is based on the City's current knowledge. As additional MS4 Permit compliance concerns come to the City's attention, we will update the Water Board.

Please contact me with any questions at 951-308-6387 or Stuart.Kuhn@TemeculaCa.gov.

Kind regards,

Stuart Kuhn

Associate Civil Engineer

City of Temecula

(951) 308-6387

Stuart.Kuhn@TemeculaCA.gov

41000 Main St, Temecula, CA 92590



Please note that email correspondence with the City of Temecula, along with attachments, may be subject to the California Public Records Act, and therefore may be subject to disclosure unless otherwise exempt.



San Diego Regional Water Quality Control Board

June 23, 2020

Stuart Kuhn
Associate Civil Engineer
City of Temecula
41000 Main Street
Temecula, CA 92590
Stuart.Kuhn@temeculaca.gov

Sent by Email Only

In reply refer to / attn:
214666:ERyan

Subject: Request for Compliance Relief due to COVID-19 Emergency, National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds within the San Diego Region, Order No. R9-2013-0001, as Amended, NPDES No. CAS0109266 (Order)

Mr. Kuhn:

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) received your email dated May 18, 2020 regarding actual or potential noncompliance by the City of Temecula (City) with requirements of the Order that could occur during the COVID-19 emergency. Your email requests relief for the City from specific requirements of the Order set forth below that the City believes are inconsistent with the stay-at-home and social distancing restrictions imposed by the Governor's Executive Order N-33-20 or the Riverside County Public Health Officer's directives.

Existing Development Inspections Required under the Order

Existing development inspections for municipal, residential and commercial/industrial facilities are required under provision E.5.c.(1)(a)(iv) of the Order. The Order requires that the City inspect twenty percent of its existing inventoried municipal, residential, and commercial/industrial facilities during the annual July 1 through June 30 reporting period by June 30. The City reports that staff and resources for inspections are limited at this time due to inefficiencies resulting from governmental shelter-in-place and social distancing restrictions. The City also cites difficulties in reaching responsible parties at regulated businesses that are now closed or only open during limited hours as potentially leading to delays in conducting required on-site inspections. The City is requesting a 90-day extension of the June 30 compliance date for completing required inspections specified in section F.3.b(3) of the Order. The City is also proposing to complete the remainder of its Fiscal Year (FY) 2019/20 existing development inspection commitment using drive-by inspections in lieu of in-person

HENRY ABARBANEL, PH.D., CHAIR | DAVID GIBSON, EXECUTIVE OFFICER

inspections. In order to accomplish this, the City proposes to set aside the current provision of the Jurisdictional Runoff Management Plan (JRMP) which stipulates that drive-by inspections are not counted toward meeting the requirement to inspect twenty percent of existing development facilities under provision E.5.c.(1)(a)(iv) of the Order.

Determinations on the Compliance Exception Requests

The San Diego Water Board continues to closely monitor the COVID-19 situation with a focus on protection of public health, safety, and the environment and continuity of timely compliance by the regulated community with all Water Board orders and other requirements is among the highest priorities. The San Diego Water Board recognizes the challenges posed by COVID-19, values the safety of the regulated community and the public, and does not want to put anyone at risk for contracting COVID-19. The San Diego Water Board has evaluated the City's request in accordance with these principles and the recently issued State Water Resources Control Board (State Water Board) guidance regarding permit compliance obligations in light of COVID-19.

Under the current circumstances and based on the limited information provided by the City in the May 18, 2020 email, the San Diego Water Board has made the following determinations regarding the requests for compliance relief due to the COVID-19 emergency:

1. Existing Development Drive-by Inspections

The City's request to use drive-by inspections as a method of inspection instead of on-site inspections to meet annual inspection compliance obligations under provision E.5.c.(1)(a)(iv) of the Order is approved. Provision E.5.c.(1)(a)(i)[a] of the Order allows the City to implement drive-by inspections as an inspection method by municipal staff and contract staff. Pursuant to provision F.3.b(3) of the Order, the City is expected to report any instances where changes to methods or strategies identified in the City's JRMP are implemented in the 2019/20 Annual JRMP Report due January 31, 2021.

2. Extension of Compliance Date for Existing Development Inspections

The City's request for a 90-day extension to complete all existing development compliance inspections required by provision E.5.c.(1)(a)(iv) of the Order is approved. The compliance date in provision F.3.b.(3)(e) of the Order for the completion of the inspections is extended from June 30, 2020 to September 30, 2020. Failure to comply with the extended compliance date may subject the City to enforcement actions by the San Diego Water Board including imposition of administrative civil liability of up to \$10,000 per day per violation, referral to the State Attorney General for injunctive relief, or any other enforcement action authorized by law. Pursuant to provision F.3.b(3) of the Order, the City is expected to report all required inspection information in the 2019/20 Annual JRMP Report due January 31, 2021.

Except as otherwise stipulated in the San Diego Water Board determinations above, all the requirements of the Order remain in full force and effect. In the event circumstances change to allow for compliance with the Order, the City must notify the San Diego Water Board immediately of the change in circumstances and comply with the Order as soon as possible.

The San Diego Water Board appreciates your assistance and efforts to continue the important work to protect human health and the environment, while ensuring the safety of your employees and the community we seek to protect. Additional information is available at the State Water Board's website (https://www.waterboards.ca.gov/resources/covid-19_updates).

In the subject line of any response please include the reference number 214666:ERyan. If you have any questions or concerns, please contact Erica Ryan via email at Erica.Ryan@waterboards.ca.gov.

Respectfully,

David W. Gibson
Digitally signed by David W. Gibson
Date: 2020.06.23 12:00:52
07'00'
Water Board

David W. Gibson
Executive Officer

DWG:kd:db:lw:er

- cc: Erica Ryan, San Diego Water Board, Erica.Ryan@Waterboards.ca.gov
Laurie Walsh, San Diego Water Board, Laurie.Walsh@waterboards.ca.gov
Chiara Clemente, San Diego Water Board, Chiara.Clemente@waterboards.ca.gov
David Barker, San Diego Water Board, David.Barker@waterboards.ca.gov
Catherine Hagan, State Water Board, Catherine.Hagan@waterboards.ca.gov
Vincent Vu, State Water Board, Vincent.Vu@waterboards.ca.gov
David Boyers, State Water Board, David.Boyers@waterboards.ca.gov

Tech Staff Info & Use	
Order No.	R9-2013-0001, as amended (Regional MS4 Permit)
Party IDs	348478
WDID	9 33M1000302 - 488789
NPDES No.	CA0109266
Reg. Measure IDs	387335 (Regional MS4 Permit)
PIN	214666

4 CITY OF WILDOMAR

4.1 JRMP ANNUAL REPORT

**JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM
ANNUAL REPORT FORM**

FY 2019-2020

I. COPERMITTEE INFORMATION	
Copermittee Name: <u>City of Wildomar</u>	
Copermittee Primary Contact Name: <u>Daniel A. York</u>	
Copermittee Primary Contact Information: Address: <u>23873 Clinton Keith Rd., Suite 201</u>	
City: <u>Wildomar</u>	County: <u>Riverside</u>
State: <u>CA</u>	Zip: <u>92595</u>
Telephone: <u>(951) 677-7751</u>	Fax: <u>(951) 698-1463</u>
Email: <u>dyork@cityofwildomar.org</u>	
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 <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 <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 PROGRAM	
Has the Copermittee implemented a program to actively detect and eliminate illicit discharges and connections to its MS4 that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public	3
Number of non-storm water discharges detected by Copermittee staff or contractors*	20
Number of non-storm water discharges investigated by the Copermittee	22
Number of sources of non-storm water discharges identified	20
Number of non-storm water discharges eliminated	17
Number of sources of illicit discharges or connections identified	9
Number of illicit discharges or connections eliminated	5
Number of enforcement actions issued	13
Number of escalated enforcement actions issued	0
<i>*Includes discharges detected by Riverside County Flood Control (RCFC) in Wildomar</i>	
V. DEVELOPMENT PLANNING PROGRAM	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Was an update to the BMP Design Manual required or recommended by the San Diego Water Board?	YES <input type="checkbox"/> NO <input checked="" 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 <input type="checkbox"/> NO <input type="checkbox"/>
Number of proposed development projects in review	37
Number of Priority Development Projects in review	16
Number of Priority Development Projects approved	8
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	3
Number of completed Priority Development Projects in inventory	24
Number of high priority Priority Development Project structural BMP inspections	12
Number of Priority Development Project structural BMP violations	4
Number of enforcement actions issued	4
Number of escalated enforcement actions issued	0

FY 2019-2020

VI. CONSTRUCTION MANAGEMENT PROGRAM

Has the Copermittee implemented a construction management program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Number of construction sites in inventory	16	
Number of active construction sites in inventory	6	
Number of inactive construction sites in inventory	2	
Number of construction sites closed/completed during reporting period	2	
Number of construction site inspections	85	
Number of construction site violations	41	
Number of enforcement actions issued	41	
Number of escalated enforcement actions issued	2	

VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM

Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>		
	Municipal	Commercial	Industrial	Residential
Number of facilities or areas in inventory	12	167	2	0
Number of existing development inspections	0	32	0	N/A
Number of follow-up inspections	N/A	2	N/A	N/A
Number of violations	N/A	7	N/A	N/A
Number of enforcement actions issued	N/A	7	N/A	N/A
Number of escalated enforcement actions issued	N/A	0	N/A	N/A

VIII. PUBLIC EDUCATION AND PARTICIPATION

Has the Copermittee implemented a public education program component that complies with Order No. R9-2013-0001?	YES <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 <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 <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
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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.



1/27/2021

Signature

Date

DANIEL A. YORK

ASSISTANT CITY MANAGER

Print Name

Title

(951) 677-7751

dyork@cityofwildomar.org

Telephone Number

Email

JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM ANNUAL REPORT FORM

Additional Information for Annual Report Responses

1. City staff and City contractors are trained to identify and respond to stormwater pollution prevention deficiencies during the normal course of business to make sure deficiencies are brought to the appropriate party's attention and resolved, to the extent possible. Due to the dynamic nature of the work, the regular workload, and available resources, not all stormwater related incidents and coordination activities are separately tracked. Please see the information below for additional detail regarding this. As reported last year, the City evaluated and began developing its EDEN Permit software to track stormwater related data to improve the documentation of the various stormwater program related elements. However, the City's EDEN software is no longer supported and so the City is in the midst of the process to purchase new software. As a result, while improving tracking, documentation, and reporting are still goals, the actual implementation of enhanced NPDES tracking through the use of dedicated software will be delayed. The City will continue to track NPDES items as required and seek to make enhancements wherever possible.
2. **Section III:**
 - a. The City updated the JRMP in FY 17-18, as required by the MS4 Permit. However, during FY 18-19 the City received an over-irrigation audit from the Regional Board which identified the need to make other updates to the JRMP. The City completed the required updates, along with other updates, in January 2020 (FY 19-20) and an errata sheet identifying the specific updates made to the JRMP is included in the updated JRMP. The updated JRMP has been uploaded to the City's website and to the Regional Clearinghouse.
3. **Section IV:**
 - a. City staff and maintenance staff are trained to respond to calls, reports, or observed violations as necessary to resolve issues but some of these incidents are not separately tracked or documented and occur during the normal course of business.
 - b. City staff occasionally receive reports of discharges detected within a Riverside County Flood Control and Water Conservation District (RCFCWCD) MS4 facility. These reports come from RCFCWCD inspectors. RCFCWCD inspectors provide the City with a summary of the incident, including any follow-up investigation and public education provided. The City typically sends its own inspector to perform a follow-up inspection to verify that the discharge has been eliminated and/or to reinforce the public education already provided.
 - c. Enforcement Actions include Education/Information given to the party in violation. In some cases, staff did not have direct contact with the party in violation or the violation was the result of a maintenance issue (e.g. broken irrigation), traffic accident, or other similar accidental incident. In those cases, the incident was resolved but no specific "enforcement" action occurred.
4. **Section V:**
 - a. The number of proposed development projects in review includes commercial and residential projects that were in entitlement review, final engineering review, or which required a grading permit during the reporting period, as well as applicable Capital Improvement Projects that were in design/review. This number does not include preliminary application reviews (pre-entitlement), survey-only reviews (e.g. only a Final Map review for a priority development project), or projects that did not require grading permits.
 - b. The number of Priority Development Projects in review includes projects in entitlement review and in final engineering review. The number of Priority Development Projects approved includes projects approved through entitlement during the reporting period or projects approved through final engineering during the reporting period. This number does not include survey-only reviews (e.g. only a Final Map review for a priority development project).
 - c. The number of Priority Development Projects granted occupancy includes projects which have been granted partial occupancy (e.g. residential projects with occupancy for some lots, commercial projects with occupancy for some buildings) or those projects granted complete occupancy.
 - d. The number of Priority Development Projects in Inventory includes one (1) City owned and operated park with post-construction BMPs.

**JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM
ANNUAL REPORT FORM**

5. Section VI:

- a. The number of construction sites in the Inventory is current as of the date of the annual report, is not specific to the reporting period, and includes active, inactive, and completed projects. Some projects identified in the inventory may have begun construction after the reporting period.
- b. The City's Building and Public Works Inspectors are at construction sites routinely to monitor on-going construction activities and are trained regarding Construction BMP requirements. City staff also regularly communicate with developers or contractors by email regarding BMP deficiencies/corrections and send out reminders to the same regarding anticipated rain events. Inspectors may also verbally communicate with contractors regarding BMP deficiencies or corrections. These activities are not separately documented as formal inspections.
- c. Two escalated enforcement actions, both Stop Work Orders, were issued this reporting period. Both incidents were reported to the San Diego Regional Board as required by the MS4 Permit.

6. Section VII:

- a. Municipal:
 - i. The City owns/operates seven (7) facilities and five (5) vacant properties, for a total of twelve (12) facilities or areas. These include: four (4) parks, one (1) cemetery, one (1) fire station, one (1) property with baseball fields, and five (5) vacant properties.
 - ii. Inspections conducted at municipal facilities (parks and cemetery) are routine, weekly, site inspections. Maintenance staff are trained to identify and correct stormwater pollution deficiencies at City facilities.
 - iii. The City cleans its catch basins routinely and cleaned out its catch basins during the reporting period.
 - iv. The City may, from time to time, provide verbal notices to contractors/maintenance staff regarding stormwater pollution prevention practices or problems.
- b. Commercial:
 - i. The number of facilities reported is current as of the date of the annual report and is not specific to the reporting year. Therefore, the number of facilities currently in the inventory may be greater than the number of facilities that were in the inventory during the reporting year. The number of facilities excludes those commercial facilities which were at one time in the inventory but have closed. The inventory also includes mobile facilities that are required to be tracked. The number of facilities inspected is specific to the reporting year.
- c. Industrial:
 - i. The City is aware of two sites that have Industrial General Permit Coverage within the City's jurisdiction. One site is a public school district site (Lake Elsinore Unified School District Transportation Facility, WDID #8 331018062) and the second site is a public agency site (Riverside County Transportation Department – Bundy Canyon Borrow Site, WDID #9 331025489). The City has not historically inspected these sites because one is a public school facility and such facilities are not typically subject to City inspections (typically subject to State inspections) and the other site belongs to the County of Riverside, another copermitee subject to the MS4 Permit, who perform their own site inspections.
- d. Residential:
 - i. Stormwater pollution prevention deficiencies within existing residential developments may be identified by IC-ID identification and evaluation or other sources of information which may help identify areas with stormwater pollution violations so that they can be addressed and eliminated. In addition, City Outfall Monitoring inspections and field screening reports from RCFC can also help identify residential areas where additional attention may be needed to eliminate possible sources of pollutants. Similarly, monitoring results from outfall sampling can also help identify if there is a specific pollutant problem within certain areas and if any focused efforts are needed in those areas.

FISCAL ANALYSIS

The following table provides estimated expenditures for the current reporting period, the preceding reporting period, and the next reporting period. This table identifies the expenditures (such as capital, operation and maintenance, education, and administrative expenditures) necessary to accomplish the activities described in the City of Wildomar's JRMP as required under Section H.2 of the 2013 SMR MS4 Permit.

Program Element	Fiscal Year 2018-2019 (Actuals)		Fiscal Year 2019-2020 (Reporting Year - Actuals)		Fiscal Year 2020-2021 (Anticipated)	
	Capital Expenditures	O&M/Admin Expenditures	Capital Expenditures	O&M/Admin Expenditures	Capital Expenditures	O&M/Admin Expenditures
Program Management		\$29,472.50		\$65,045.00		\$50,000.00
Annual Fee for MS4 NPDES Permit		\$14,230.00		\$14,230.00		\$14,230.00
Implementation Agreement Shared Cost		\$119,304.18		\$67,054.51		\$186,074.00
Construction Inspections		(2)		(2)		(2)
Development Planning		(2)		(2)		(2)
Industrial and Commercial Inspections		\$5,975.00		\$4,535.00		\$7,500.00
Illicit Connections & Illegal Discharges Program		(4)		(4)		(4)
Municipal Facilities and Activities		(5)		(5)		(5)
Public Education & Outreach		(1) and (1a)		(1) and (1a)		(1) and (1a)
Monitoring Program		(1)		(1)		(1)
Retrofit Program		(1)		(1)		(1)
Other (Lake Elsinore and Canyon Lake TMDL Task Force Costs, etc...)		\$23,510.00 (6)		\$33,893.19 (6)		\$30,945.00 (6)
Total	\$	\$192,491.68	\$	\$184,757.70	\$	\$288,749.00

FISCAL ANALYSIS

Notes:

1. These items are included in the "Implementation Agreement Shared Cost" between the City and the other Co-Permittees.
 - a. Public Education Note: The City also actively provides Public Education, however costs associated with City-specific efforts are not tracked separately and are included in the "Program Management" costs.
2. These items are included in the cost billed to the project developer and are not tracked separately.
3. Not used.
4. IC/ID program activity costs are not tracked separately and are included in the "Project Management" costs.
5. While the City does have expenditures related to Municipal Facility maintenance, the City does not have a separate line item for the maintenance costs specifically related to stormwater pollution prevention. Depending on the nature of the work being performed, the costs may be tracked to various different fund accounts (e.g. park maintenance, cemetery maintenance, stormwater management, etc...).
6. The City incurs code enforcement costs and legal fees for some stormwater compliance violations. Costs for code enforcement may have been incurred during the past two fiscal years or may be incurred in future fiscal years, in varying amounts, but the specific costs are not separately tracked. Other expenditures may also include other miscellaneous NPDES related fees, printing/reproduction fees, etc...

FISCAL ANALYSIS

7. A description of the source(s) of funds that are proposed to meet the necessary expenditures for the subsequent year.

Source of Funds	Capital Expenditures	Percent of Total Program Funding	Restrictions on Use (if applicable)
General Fund		81%	
Business Registration Fees			Can only be used on Commercial-Industrial Inspections for registered businesses.
Developer Deposits		Varies	Can only be used on the specific development project to which the review, inspection, or enforcement activities apply.
LLMD 89-1-C/CSA 152		19%	Maximum parcel assessment established at annexation into district. Must be used for fossil filter replacement and street sweeping within specified neighborhoods.

FISCAL ANALYSIS

8. Provide a narrative description of circumstances resulting in a 25 percent or greater annual change for any budget line item.

Program Element	Percent Change in Cost	Fiscal Years with Change	Description
Program Management	128% increase and 26% decrease	FY 18-19 (actuals) to FY 19-20 (actuals) and FY 19-20 (actuals) to FY 20-21 (budget)	Staff anticipated an increase in expenditures from FY 18-19 to FY 19-20. However, expenditures in FY 19-20 were greater than anticipated. New staff members were trained in the NPDES program and additional staff time was spent on focused efforts to update items in the program. Costs are expected to decrease (normalize) now that staff has been trained and focused efforts are mostly complete.
Implementation Agreement Shared Costs	44% decrease and 177% increase	FY 18-19 (actuals) to FY 19-20 (actuals) and FY 19-20 (actuals) to FY 20-21 (budget)	Implementation Agreement cost shares often include credits from previous fiscal years. Although previously not anticipated, there was a credit included in the cost sharing budget for FY 19-20. The City's cost share for FY 19-20 includes all credits/debits from the previous fiscal year. The City's cost share is expected to increase (normalize) in FY 19-20.
Commercial Inspections	61% increase	FY 19-20 (actuals) to FY 20-21 (budget)	Actual inspection expenditures in FY 19-20 were less than anticipated. A slightly decreased budget has been proposed for FY 20-21 but the budget still results in a 61% increase from FY 19-20 actuals.

4.2 STRATEGIES

Table A2-16. City of Wildomar, Illicit Discharge Detection and Elimination Program Strategies

Number	Santa Margarita River Illicit Discharge Detection and Elimination Program Strategies - City of Wildomar	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
IDDE-1	Assess IDDE incidents to identify clusters, if any, where targeted efforts may be effective in eliminating dry weather flows.	●	●	A/P		<ul style="list-style-type: none"> The City performed a visual geographic assessment of recorded IDDE incidents, in FY 19-20. IDDE incidents were plotted on a map but plotted incidents did not demonstrate any specific IDDE clusters. The only observable pattern was that the majority of incidents were residential-related. As reported last year, staff had previously observed over-irrigation from a specific community. The HOA Manager for that community offered to help educate their residents regarding over-irrigation. This year, the City prepared a specific letter regarding the Over-Irrigation prohibition and distributed it, along with a Public Education Fact Sheet, to the HOA Manager so that the information could be distributed to community residents. The City also sent the same letter and fact sheet to all other known HOAs throughout the City.
IDDE-2	Update ordinances to reflect current illicit discharge and connections requirements and strategies.	●	●	A		<ul style="list-style-type: none"> An Ordinance Amendment was completed in September 2019 to ensure that the City's Municipal Code prohibited over-irrigation runoff. While no specific additional updates are planned at this time, the City will continue to update its ordinances, where necessary and appropriate, to ensure compliance with the MS4 Permit.

Table A2-16. City of Wildomar, Illicit Discharge Detection and Elimination Program Strategies

Number	Santa Margarita River Illicit Discharge Detection and Elimination Program Strategies - City of Wildomar	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
IDDE-3	Utilize service request forms to improve external reporting of IDDE incidents, to help staff more efficiently identify and respond to IDDE incidents. Develop an internal procedure to improve tracking of and response to IDDE incidents observed by staff directly.	◐	●	A/P		<ul style="list-style-type: none"> • IDDE reporting options, including the ability to report irrigation runoff, were added to the service request forms on the City's website in September 2019, to improve external reporting. • Staff had preliminary conversations regarding enhanced and improved procedures for internal identification, reporting, and tracking of IDDE incidents by Copermittee staff. The City will continue to pursue this in FY 20-21.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-17. City of Wildomar, Development Planning Program Strategies

Number	Santa Margarita River Development Planning Program Strategies - City of Wildomar	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
DEV-1	Smart Irrigation Development Standards	●	●	A		<ul style="list-style-type: none"> City Council has adopted the WATER EFFICIENT/CONSERVATION LANDSCAPE STANDARDS MANUAL. The manual states that "Landscaped areas shall be provided with a smart irrigation controller which automatically adjusts the frequency and/or duration of irrigation events in response to changing weather conditions."
DEV-2	Revised post-construction guidelines to eliminate potential dry weather discharges from new and redevelopment				Combined with DEV-3 to form one strategy	
DEV-3	Amend BMP design manuals to address sources of HPWQCs and PWQCs on new and redevelopment projects (e.g., irrigation design standards , LID implementation), including eliminating prohibited dry weather discharges (e.g., irrigation design standards, site design standards) , and conduct internal staff training on updated BMP design manual	X	X	A	Updated description to clarify strategy	<ul style="list-style-type: none"> The 2018 Wildomar WQMP is based on the 2018 Santa Margarita Region WQMP and has been in effect since July 1, 2018. The 2018 WQMP requires projects to eliminate non-exempt non-stormwater discharges, which addresses dry weather HPWQCs and PWQCs, so no additional changes to the WQMP were needed.

Table A2-17. City of Wildomar, Development Planning Program Strategies

Number	Santa Margarita River Development Planning Program Strategies - City of Wildomar	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
DEV-4	Require new commercial/industrial development projects to submit a summary of the business' operations and best management practices for storm water pollution prevention. Require new development projects with CC&Rs to address stormwater pollution prevention practices in their CC&Rs.	●	●	A/P		<ul style="list-style-type: none"> The City's standard Conditions of Approval (COAs) require new commercial developments to submit documentation regarding business practices and applicable BMPs. In FY 19-20, the City revised and clarified the language in the COA. Through the development review process, the City required new developments with CC&Rs to include specific language addressing stormwater pollution prevention requirements and practices. To standardize these requirements, the City also began drafting a new standard Condition of Approval for private development projects to require all future projects with CC&Rs to specifically address stormwater pollution prevention in the CC&Rs.
DEV-5	Require Delineation of Jurisdictional Areas on Development Plans and Require Enhanced Sediment Control BMPs to be Shown Adjacent to Jurisdictional Areas on Development Plans	●	●	A		<ul style="list-style-type: none"> The City previously updated its review checklists to include this strategy as a required item to be shown on grading plans. Plan reviewers are made aware of the specific requirements and the updated checklist is made available to development engineers on the City's website.
DEV-6	Provide Street Sweeping Services for New City Streets	●	●	A		<ul style="list-style-type: none"> The City typically requires all new development projects constructing public improvements to annex into the CFD for maintenance. CFD maintenance typically includes street sweeping for newly constructed public streets.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-18. City of Wildomar, Construction Management Program Strategies

Number	Santa Margarita River Construction Management Program Strategies - City of Wildomar	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
CON-1	Implement, or require the implementation of, enhanced construction BMPs on specific projects.	●	●	A		<ul style="list-style-type: none"> The City previously updated its review checklists to include this strategy as a required item to be shown on grading plans. Plan reviewers are made aware of the specific requirements and the updated checklist is made available to development engineers on the City's website.
CON-2	Provide enhanced focus on specific items during construction inspections.	●	●	A		<ul style="list-style-type: none"> The City previously modified its NPDES Construction Activity Inspection Form to identify enhanced BMP requirements for landscape material stockpiles.
CON-3	Require Delineation of Jurisdictional Areas on Project Sites and Require Enhanced Sediment Control BMPs Adjacent to Jurisdictional Areas	●	●	A		<ul style="list-style-type: none"> The City previously modified its Grading Job Card to require an initial Pre-Grading NPDES inspection, prior to any grading activities. The Pre-Grading NPDES Inspection includes, as applicable to each project, verification of the following NPDES-related items: Jurisdictional Areas Delineated, BMPs, and SWPPP. The City updated its standard NPDES Construction Activity Inspection Form to include verification that jurisdictional areas delineation remains and is maintained during construction.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-19. City of Wildomar, Existing Development Management Program Strategies

Number	Santa Margarita River Existing Development Management Program Strategies City of Wildomar	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
ED-1	Enhanced municipal training programs and curriculum targeting key field staff. Programs will focus on the water quality improvement plan, HPWQCs, NNE requirements as related to illicit discharges and elimination of dry weather flows.	●	●	A		<ul style="list-style-type: none"> The City participates in the SMR Copermittee Training modules that are coordinated by Riverside County Flood Control and are conducted on behalf of all of the SMR Copermittees. Training includes information regarding the WQIP and HPWQC.
ED-2	Evaluate feasibility of utilizing weather sensors in existing publicly maintained landscape areas and where feasible, install new weather based irrigation controllers in those areas.	●	●	A/P		<ul style="list-style-type: none"> The City was unable to proceed with installation of smart irrigation controllers at a park site due to budget constraints during FY 19-20. However, irrigation at City parks is regularly adjusted based on the season and weather, to minimize potential waste and runoff. Some other publicly maintained landscape areas currently have weather sensors installed and in operation. Staff will plan to evaluate all of the publicly maintained landscaped areas to determine the feasibility of installing weather based irrigation controllers where none currently exist.
ED-3	Address failed septic systems that are discharging effluent to the ground surface.	●	●	A		<ul style="list-style-type: none"> The City responds to reports of discharging effluent and also contracts with the County Department of Environmental Health for permitting of failing or overflowing septic systems.

Table A2-19. City of Wildomar, Existing Development Management Program Strategies

Number	Santa Margarita River Existing Development Management Program Strategies City of Wildomar	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
ED-4	Report potential Agricultural Permit Non-Filers to the San Diego Water Board.	●	●	A		<ul style="list-style-type: none"> The City did not make note of any Agricultural operations that appear to require coverage under the San Diego Water Board's Agricultural Order. If the City is made aware of an Agricultural non-filer, the City will notify the San Diego Water Board.
ED-5	Clean out catch basins.	●	●	A		<ul style="list-style-type: none"> Catch basin clean-out was performed during the reporting fiscal year.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-20. City of Wildomar, Enforcement Response Plans Program Strategies

Number	Santa Margarita River Enforcement Response Plans Program Strategies City of Wildomar	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
ERP-1	Implement escalating enforcement responses to compel compliance with statutes, ordinances, permits, contracts, orders, and other requirements for IDDE, development planning, construction management, and existing development in the Enforcement Response Plan.	●	●	A		<ul style="list-style-type: none"> The City implements the Enforcement Response Plan as described in the JRMP.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-21. City of Wildomar, Public Education and Participation Program Strategies

Number	Santa Margarita River Public Education and Participation Program Strategies City of Wildomar	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
PubEd-1	Enhanced outreach programs targeting nurseries.	●	●	A		<ul style="list-style-type: none"> The City identifies nurseries operating within its jurisdiction through the Business Registration Process. Nurseries are provided with BMP Handouts and Educational Materials, upon approval of their business registration. Nurseries are also added to the commercial inspection list to receive inspections.
PubEd-2	Enhanced outreach programs targeting animal facilities.	●	●	A		<ul style="list-style-type: none"> The City identifies locations with livestock/equestrian operations within its jurisdiction through the Business Registration Process. Property owners are provided with BMP Handouts and Educational Materials, upon approval of their business registration, targeting animal care. If the business operations incorporate the livestock, inspections may also be required.
PubEd-3	Public Education for businesses and residents.	●	●	A		<ul style="list-style-type: none"> The City provides Irrigation Runoff BMP Handouts to home-based business registration applicants whose business address is located within the City of Wildomar (i.e. residents), regardless of the nature of their business activities. The City continues to provide BMP Handouts to businesses based on their business activities, and as required in the JRMP.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-22. City of Wildomar, Optional Jurisdictional Strategies

Number	Santa Margarita River Optional Jurisdictional Strategies City of Wildomar	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
OPT-1	Coordination with Water Districts to pinpoint and address problem sources of dry weather flows; potential implementation actions could include rebate/incentive programs, irrigation retrofits, or other programs as appropriate and effective.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020.
OPT-2	Consider and Prioritize, where possible, Multi-Benefit Master Drainage Plan Projects that have both Flood Control and Channel or Habitat Rehabilitation Benefits.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020.
OPT-3	Enhancements and/or adjustments to street sweeping practices, frequencies, and routes, as determined by jurisdiction.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-23. City of Wildomar, Optional WMA Strategies

The City of Wildomar will implement Optional WMA Strategies through cooperative agreements with the Santa Margarita River Copermittees. The Optional WMA Strategies that will be implemented are identified in the Riverside County Flood Control and Water Conservation District (RCFCWCD) WQIP Strategy Table. Please refer to the RCFCWCD WQIP "Optional WMA Strategies" in Table A2-39 for details.

Notes:

- - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
- A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

4.3 MODIFICATIONS TO WQMP

Modifications to the WQMP were made during FY 2017-2018. The current WQMP went into effect on July 5th, 2018. No modifications to the WQMP were made during the reporting period. The current City of Wildomar WQMP is posted on the City's website.

4.4 MODIFICATIONS TO THE JRMP

Modifications to the JRMP were made during FY 2019-2020. The City updated the JRMP in response to the over-irrigation audit received from the Regional Board. An updated JRMP, which also includes a summary of changes, is available online:

[https://www.cityofwildomar.org/UserFiles/Servers/Server_9894739/File/City Services/Public Works/City of Wildomar JRMP \(updated Jan2020\).pdf](https://www.cityofwildomar.org/UserFiles/Servers/Server_9894739/File/City%20Services/Public%20Works/City%20of%20Wildomar%20JRMP%20(updated%20Jan2020).pdf).

4.5 CORRESPONDENCE REGARDING COMPLIANCE DURING THE COVID-19 PANDEMIC

The City of Wildomar did not request any regulatory relief from the San Diego Water Board related to compliance with the Municipal Permit during the COVID-19 pandemic.

5 COUNTY OF RIVERSIDE

5.1 JRMP ANNUAL REPORT

**JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM
ANNUAL REPORT FORM**

FY 2019-2020

I. COPERMITTEE INFORMATION	
Copermittee Name: Riverside County	
Copermittee Primary Contact Name: Scott Bruckner	
Copermittee Primary Contact Information: Address: 4080 Lemon St	
City: Riverside	County: Riverside
State: CA	Zip: 92501
Telephone: 951-955-9760	Fax: 951-955-0049
Email: sbruckner@rivco.org	
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 <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 <input type="checkbox"/> NO <input checked="" 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 type="checkbox"/> NO <input type="checkbox"/>
IV. ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM	
Has the Copermittee implemented a program to actively detect and eliminate illicit discharges and connections to its MS4 that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
County-wide Data as Follows:	
Number of non-storm water discharges reported by the public	65
Number of non-storm water discharges detected by Copermittee staff or contractors	25
Number of non-storm water discharges investigated by the Copermittee	64
Number of sources of non-storm water discharges identified	51
Number of non-storm water discharges eliminated	30
Number of sources of illicit discharges or connections identified	1
Number of illicit discharges or connections eliminated	0
Number of enforcement actions issued	65
Number of escalated enforcement actions issued	1
V. DEVELOPMENT PLANNING PROGRAM	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Was an update to the BMP Design Manual required or recommended by the San Diego Water Board?	YES <input type="checkbox"/> NO <input checked="" 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 <input type="checkbox"/> NO <input type="checkbox"/>
Number of proposed development projects in review	46
Number of Priority Development Projects in review	63
Number of Priority Development Projects approved	18
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	1
Number of completed Priority Development Projects in inventory	0
Number of high priority Priority Development Project structural BMP inspections	0
Number of Priority Development Project structural BMP violations	0
Number of enforcement actions issued	0
Number of escalated enforcement actions issued	0

FY 2019-2020

VI. CONSTRUCTION MANAGEMENT PROGRAM					
Has the Copermittee implemented a construction management program that complies with Order No. R9-2013-0001?				YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Number of construction sites in inventory	269				
Number of active construction sites in inventory	204				
Number of inactive construction sites in inventory	0				
Number of construction sites closed/completed during reporting period	124				
Number of construction site inspections	156				
Number of construction site violations	0				
Number of enforcement actions issued	0				
Number of escalated enforcement actions issued	0				
VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM					
Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001?				YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	Municipal	Commercial	Industrial	Residential	
Number of facilities or areas in inventory	1975	124	24	269	
Number of existing development inspections	1975	80	16	156	
Number of follow-up inspections	216	4	2	69	
Number of violations	N/A	0	0	0	
Number of enforcement actions issued	N/A	0	0	0	
Number of escalated enforcement actions issued	N/A	0	0	0	
VIII. PUBLIC EDUCATION AND PARTICIPATION					
Has the Copermittee implemented a public education program component that complies with Order No. R9-2013-0001?				YES <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 <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 <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

FISCAL ANALYSIS

The following table provides estimated expenditures for the current reporting period, the preceding reporting period, and the next reporting period. This table identifies the expenditures (such as capital, operation and maintenance, education, and administrative expenditures) necessary to accomplish the activities described in the Riverside County JRMP as required under Section H.2 of the 2010 SMR MS4 Permit.

Program Element	Source	Fiscal Year 2018-2019 Actuals	Fiscal Year 2019-2020 Actuals	Fiscal Year 2020-2021 Budget
Program Mgmt/Admin*	General Fund & Gas Tax	\$470,700	\$652,512	\$680,678
Annual Fee for MS4 NPDES Permit*	General Fund	\$56,921	\$56,921	\$56,921
Implementation Agreement (IA) Shared Cost	General Fund	\$232,010	\$137,883	\$300,000
Construction Inspections*	Deposit-Based Fees	\$175,000	\$175,000	\$175,000
Development Planning*	Deposit- Based Fees	\$175,000	\$175,000	\$175,000
Industrial and Commercial Inspections*	Business License Fees	\$175,000	\$175,000	\$175,000
Illicit Connections & Illegal Discharges Program	Various Dept Operational Budgets	N/A	N/A	N/A
Municipal Facilities and Activities*	General Fund & Gas Tax	\$1,415,290	\$1,027,273	\$1,078,637
Public Education & Outreach	IA Shared Costs	N/A	N/A	N/A
Monitoring Program	IA Shared Costs	N/A	N/A	N/A
Retrofit Program	General Fund	\$10,000	\$10,000	\$10,000
MS4 Mapping*	Gas Tax	\$231,779	\$286,622	\$290,000
Street Sweeping (CSA152)*	Parcel Fee	\$3,706,026	\$3,670,226	\$3,700,000
Roadside Litter Removal Program*	Gas Tax	\$257,426	\$110,538	\$111,000
Asphalt Overlay/Sealing**	Gas Tax	\$7,523,775	\$8,034,748	\$8,035,000
	Total	\$14,467,648	\$14,511,723	\$14,787,236

*County-wide program costs

**Not part of the overall NPDES Program; however, considered a significant County-wide NPDES-related activity

**JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM
ANNUAL REPORT FORM**

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.

Pania Odenbaugh

Signature

1/20/21

Date

Pania Odenbaugh

Print Name

DEPUTY COUNTY EXECUTIVE OFFICER

Title

951-955-1110

Telephone Number

RODENBAUGH@RIVCO.ORG

Email

5.2 STRATEGIES

Table A2-24. County of Riverside, Illicit Discharge Detection and Elimination Program Strategies

Number	Santa Margarita River Illicit Discharge Detection and Elimination Program Strategies - County of Riverside	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
IDDE-1	Utilize municipal personnel and contractors to identify and report Illicit Connections and Discharges (with emphasis on over-irrigation).	●	●	A		<ul style="list-style-type: none"> County has mapped MS4 facilities and is monitoring high priority areas for IC/ID's. County is on training subcommittee to look at focused training for field staff/contractors.
IDDE-2	Develop a reporting mechanism for incidental observations of IC/ID by County staff field personnel.	●	●	A		<ul style="list-style-type: none"> Per the JRMP County has a reporting process that includes providing forms and educational material to field staff. County is on training subcommittee to provide training on any identified areas requiring improvement.
IDDE-3	Develop a procedure to map IC/ID cases in GIS to assist in ongoing identification of IC/ID target areas.	●	●	A		<ul style="list-style-type: none"> Field forms have been distributed to field staff. They are forwarded for GIS mapping with an emphasis on nutrient sources. Nutrient loading is the highest priority. The process includes submittal of forms to NPDES coordinator for follow up.
IDDE-4	Conduct IC/ID - IDDE focused training for County Department field staff.	●	●	A/P		<ul style="list-style-type: none"> County is on training subcommittee to identify and develop focused training for field staff. County has identified staff to attend training to ensure they train their employees.

Table A2-24. County of Riverside, Illicit Discharge Detection and Elimination Program Strategies

Number	Santa Margarita River Illicit Discharge Detection and Elimination Program Strategies - County of Riverside	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
IDDE-5	Respond, educate and require mitigation on septic system failures where observed. Coordinate investigations with Environmental Health (County Regulatory Agency for Septic Systems). Focus on elimination of nutrient loading from phosphorus sources and bacteria loading to MS4 from septic failure. Educate property owners on proper septic maintenance and the importance of eliminating discharges to the MS4.	●	●	A/P		<ul style="list-style-type: none"> A process is in place to respond to septic problems through code enforcement and environmental health. Education in the form of an updated brochure is being planned.
IDDE-6	Implement practices and procedures to address accidental spills (with emphasis on identifying Nutrient and other PWQP sources) with the potential to enter the storm drain system. Implement employee spill notification/reporting focused training County-wide.	●	●	A/P		<ul style="list-style-type: none"> County has a process in place for accidental spills. Focused training is being planned for employees county-wide. County identified appropriate staff to attend training to ensure they train their employees.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-25. County of Riverside, Development Planning Program Strategies

Number	Santa Margarita River Development Planning Program Strategies - County of Riverside	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
DEV-1	Update BMP Design Manual procedures to specify storm water requirements applicable to development and redevelopment projects, identify and design appropriate BMPs, establish maintenance criteria, and establish alternative compliance options. Specific consideration to BMP implementation will be given to reducing/eliminating Nutrient and other PWQP loading to the MS4 and receiving waters.	●	●	A/P		<ul style="list-style-type: none"> The BMP manual has been updated and approved by the San Diego Water Board. Alternative compliance options are in development.
DEV-2	Conduct training on the updated BMP Manual.	●	●	A/P		<ul style="list-style-type: none"> Training on updated BMP manual has been completed and is ongoing.
DEV-3	Prepare drought tolerant Guidelines and Standards for new development and BMP retrofits (e.g. water smart irrigation controllers, turf replacement programs, residential landscape evaluation program).	●	●	P		<ul style="list-style-type: none"> Executive office is reviewing ordinance currently.
DEV-4	Develop a NPDES DATA FORM for Design Teams to identify project-related NPDES data to facilitate: identification of HPWQC and PWQP sources, analyze HPWQC and PWQP source reduction in CEQA/NEPA document, and design of post-construction BMPs to address HPWQC and PWQPs loading reduction and hydromodification.	●	●	A		<ul style="list-style-type: none"> County's NPDES memo has been updated to identify activities in high priority areas and high nutrient land uses.
DEV-5	Update County codes, ordinances, and landscape design standards consistent with the permit, including but not limited to prohibition of over irrigation; and the updated BMP Manual.	●	●	A/P		<ul style="list-style-type: none"> Executive office has revised ordinance 754.3 to address overwatering. BMP manual has been updated and approved.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-26. County of Riverside, Construction Management Program Strategies

Number	Santa Margarita River Construction Management Program Strategies – County of Riverside	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
CON-1	Require implementation of enhanced BMPs that reduce the potential of HPWQC and PWQP loading, and that are specific to the grading phase, year round.	●	●	A/P		<ul style="list-style-type: none"> County updated the NPDES memo to include identification of high priority areas and high nutrient land uses. Developing enhanced BMP training and procedures.
CON-2	Make updates to County ordinances related to construction; reference to existing grading ordinance and requirement to implement enhanced BMPs to mitigate erosion and dry weather flows to MS4 and receiving waters in the SMR.	●	●	P		<ul style="list-style-type: none"> Currently evaluating processes and developing enhanced BMP training.
CON-3	Ensure grading activities are classified as HIGH priority if land is surrounded by or was previously used for agricultural operations.	●	●	P		<ul style="list-style-type: none"> Currently evaluating processes. County updated NPDES memo to include identification of high priority areas, high nutrient land uses, and agricultural areas.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-27. County of Riverside, Existing Development Management Program Strategies

Number	Santa Margarita River Existing Development Management Program Strategies County of Riverside	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
ED-1	Enhance the Business Registration Program by educating owners on Nutrient and other PWQP source reduction.	●	●	P		<ul style="list-style-type: none"> Currently developing language or brochure for acknowledgment at time of business registration.
ED-2	Implement a prioritized schedule of operation and maintenance activities for the storm water conveyance system draining Nutrient and PWQP source land uses (e.g. Residential and Agricultural).	●	●	P		<ul style="list-style-type: none"> County analyzed GIS mapping to develop prioritized schedule to increase amount of maintenance in high priority areas.
ED-3	Require implementation of BMPs to address application, storage, and disposal of pesticides, herbicides, and fertilizers on commercial, industrial, agricultural (e.g., large commercial nurseries), residential, and municipal properties. Includes education, verifying permits and certifications.	●	●	A		<ul style="list-style-type: none"> County currently requires proper storage and implementation of BMP's, and educates all types of property and business owners.
ED-4	Conduct inspections of inventoried existing development (including residential and agricultural land uses) to ensure BMPs are being implemented to reduce the potential of HPWQC and PWQP loading.	●	●	A/P		<ul style="list-style-type: none"> County currently conducts regular inspections of development and ensure BMP's are implemented. County is developing training of staff on high priority BMP requirements.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-28. County of Riverside, Enforcement Response Plans Program Strategies

Number	Santa Margarita River Enforcement Response Plans Program Strategies County of Riverside	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
ERP-1	Enforce escalating legal authority established for all inventoried existing development, including residential and agricultural, to conserve water and eliminate dry weather flows. Verbal warnings shall be tracked along with written escalating enforcement.	●	●	A/P		<ul style="list-style-type: none"> County currently conducts regular inspections of development and ensure BMP's are implemented.
ERP-2	Impose legal authority to ensure all development and redevelopment projects (with emphasis on residential, park and agricultural projects) are in compliance with all post construction requirements specifically as they pertain to erosion and dry weather flow prohibitions.	●	●	A		<ul style="list-style-type: none"> County's process is in place for compliance with the WQMP requirements for new and re-development projects.
ERP-3	Implement escalating enforcement responses to compel compliance with statutes, ordinances, permits, contracts, orders, and other requirements for IDDE, development planning, construction management, and existing development in the Enforcement Response Plan. Escalating enforcement strategies will initially start with education and verbal warnings and escalate to cease and desist orders to taking legal actions as necessary. All enforcement actions shall be tracked in a database.	●	●	A		<ul style="list-style-type: none"> We currently enforce our ordinances and permits for IDDE. Enforcement actions are tracked. The enforcement response plan is followed per the JRMP.
ERP-4	Report suspected agriculture operation "non-filers" to the San Diego Water Board promptly. Maintain database of reported "non-filers".	●	●	P		<ul style="list-style-type: none"> County will keep a database of non-filers if found, and report new agriculture operations we find. County Executive Office has begun meeting with agricultural representatives to discuss compliance.

Notes:

- - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-29. County of Riverside, Public Education and Participation Program Strategies

Note: a summary of County-wide education and outreach activities is included as **Attachment 2A**.

Number	Santa Margarita River Public Education and Participation Program Strategies County of Riverside	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
PubEd-1	Implement pet waste management outreach in County Parks for resident pet owners.	●	●	P		<ul style="list-style-type: none"> County Parks has installed pet waste stations at Lake Skinner. Will proceed with plan for other parks. Pet waste brochures have been in place for education.
PubEd-2	Implement a public education and participation program to promote and encourage development of programs, management practices and behaviors that reduce the discharge of HPWQC and other PWQPs (specifically for Residential and Agricultural land uses).	●	●	P		<ul style="list-style-type: none"> The County is working with Copermittees on training subcommittee on this task.
PubEd-3	Stock public County counters at Riverside County offices with Pollution Prevention Public Education brochures. Brochures should highlight the importance of proper fertilizer use/application and over irrigation. Other brochures should include emphasis on proper septic maintenance and other good practices to prevent nutrient and other PWQP loading to the MS4 and receiving waters, Provide brochures to other agencies for their public counters as well (e.g., School Administration Buildings).	●	●	A/P		<ul style="list-style-type: none"> The County stocks counters with many different stormwater brochures. Development of new brochures including overwatering is in progress.
PubEd-4	Facilitate public reporting, through outreach and public education, of Illicit Connections and Illicit Discharges, including over-irrigation.	●	●	P		<ul style="list-style-type: none"> This is a county wide effort that is being developed. County is working to improve website to facility identification of IC/ID and over irrigation reporting.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-30. County of Riverside, Optional Jurisdictional Strategies

Number	Santa Margarita River Optional Jurisdictional Strategies County of Riverside	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
OPT-1	<p>Construct and manage the Integrated Mitigated Mitigation Project. This project will result in the creation of over 1,500 linear feet of new intermittent channel and seasonal wetlands. The 75-acre site is located south of Scott Road and west of Briggs road in the County of Riverside. The project will preserve, restore and enhance the existing un-named creek (which is tributary to Warm Springs Creek), ephemeral drainages, and associated wetland habitats. This project provided the required 2.3 acres mitigation for 3 capital projects, but is planned to have approximately 71.6 acres of surplus mitigation in the form of Habitat Enhancement, Created Habitat, Preserved Habitat or Restored Habitat for this un-named creek. In total the project is planned to install approximately 2,800 plants, including Oak trees, Sycamore riparian, Southern Willow Scrub, existing channel, and wetland species. Storm water run-on containing Nutrients and other PWQPs would be treated through infiltration and biofiltration.</p>	●	●	P	Clarification	<ul style="list-style-type: none"> This project began construction in November 2020.
OPT-2	<p>Promote Incentive Partnership Programs: Live Turf Replacement & Outdoor Water Efficiency. Promote Incentive Programs with Water Agencies for BMP Retrofits.</p>	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020

Table A2-30. County of Riverside, Optional Jurisdictional Strategies

Number	Santa Margarita River Optional Jurisdictional Strategies County of Riverside	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
OPT-3	Implement a program for on-site wastewater treatment (septic) systems. May include mapping and risk assessment, inspection, or maintenance practices.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020
OPT-4	Implement a Partnering Program with Sewering Agencies (note: County of Riverside does not provide sewer system services) to identify where sewer and storm water infrastructure are in close proximity and subsequently, confirm the absence of flow at nearby major outfall during dry weather for high risk areas.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020
OPT-5	Implement a program for on-site wastewater treatment (septic) systems. May include mapping and risk assessment, inspection, or maintenance practices.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020
OPT-6	Provide outreach presentations to elementary, middle, and high school students.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020
OPT-7	Hold external land development workshops targeting the development community (developers and their engineers).	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020
OPT-8	Implement outreach program for land owners of equestrian/livestock, and other agricultural operations.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020

Table A2-30. County of Riverside, Optional Jurisdictional Strategies

Number	Santa Margarita River Optional Jurisdictional Strategies County of Riverside	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
OPT-9	Develop inspection data tracking through GIS applications.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020
OPT-10	Promote/Partner incentive programs for BMP retrofits (e.g. water smart irrigation controllers, turf replacements programs, residential landscape evaluation program).	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020
OPT-11	Implement a turf replacement program in County Parks.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020
OPT-12	Collaborate with partner agencies and groups to promote non-County sponsored incentive programs for BMP retrofits, for example, smart controllers, soil sensors, turf replacement, etc.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020
OPT-13	Outreach to large mobile landscaping service providers/vendors.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-31. County of Riverside, Optional WMA Strategies

Number	Santa Margarita River Optional Jurisdictional Strategies County of Riverside	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
WMA-1	Coordinate with Integrated Regional Water Management (IRWM) regional water quality managers to identify and apply for grants related to water quality improvement projects (retrofits, stream rehabilitation, or other projects).	◐	◐	P		<ul style="list-style-type: none"> County is looking at opportunities to apply.
WMA-2	Participate in Santa Margarita River Watershed Nutrient Initiative - Stakeholder Group to exchange information on successes on strategies. Implement or refine existing strategies to utilize other jurisdiction's strategical successes.	●	●	NT		<ul style="list-style-type: none"> Participated in quarterly meeting of SMRNIG. Meetings during FY2020: 10/2/2019 and 3/12/2020.
WMA-3	Partner/Implement Sustainable Landscapes Program with Water Agencies and Special Districts (e.g., Valley-Wide Recreation and Park Districts) to encourage landscape retrofits.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020
WMA-4	Contingent on San Diego Water Board approval of an implementable process, facilitate alternative compliance projects, for new development that are focused on restoring or creating beneficial uses.	◐	◐	P		<ul style="list-style-type: none"> This effort is in development, we are waiting on WRCOG for further development of the model.
WMA-5	Implement a program for on-site wastewater treatment (septic) systems. May include mapping and risk assessment, inspection, or maintenance practices.	X	X	NT		<ul style="list-style-type: none"> Strategy not triggered in FY 2020

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

5.3 MODIFICATIONS TO WQMP

Modifications to the WQMP were made during FY 2017-2018. The current WQMP went into effect on July 5th, 2018. No modifications to the WQMP were made during the reporting period. The current County of Riverside WQMP is posted on the County's website.

5.4 MODIFICATIONS TO THE JRMP

No modifications to the County of Riverside's JRMP have been made since the WQIP was approved. The County's current JRMP is posted in the County's website.

5.5 CORRESPONDENCE REGARDING COMPLIANCE DURING THE COVID-19 PANDEMIC

The County of Riverside did not request any regulatory relief from the San Diego Water Board related to compliance with the Municipal Permit during the COVID-19 pandemic.

**6 RIVERSIDE COUNTY FLOOD CONTROL AND WATER
CONSERVATION DISTRICT**

6.1 JRMP ANNUAL REPORT

**JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM
ANNUAL REPORT FORM**

FY 2019-2020

I. COPERMITTEE INFORMATION	
Copermittee Name: Riverside County Flood Control and Water Conservation District	
Copermittee Primary Contact Name: Matt Yeager	
Copermittee Primary Contact Information: Address: 1995 Market Street	
City: Riverside	County: Riverside
State: CA	Zip: 92501
Telephone: (951) 955-0843	Fax: (951) 780-9965
Email: MYeager@RIVCO.org	
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 <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 <input type="checkbox"/> NO <input checked="" 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 type="checkbox"/> NO <input type="checkbox"/>
IV. ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM	
Has the Copermittee implemented a program to actively detect and eliminate illicit discharges and connections to its MS4 that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Number of non-storm water discharges reported by the public	4
Number of non-storm water discharges detected by Copermittee staff or contractors	100
Number of non-storm water discharges investigated by the Copermittee	104
Number of sources of non-storm water discharges identified	75
Number of non-storm water discharges eliminated	11
Number of sources of illicit discharges or connections identified	75
Number of illicit discharges or connections eliminated	11
Number of enforcement actions issued	10
Number of escalated enforcement actions issued	0
V. DEVELOPMENT PLANNING PROGRAM	
Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Was an update to the BMP Design Manual required or recommended by the San Diego Water Board?	YES <input type="checkbox"/> NO <input checked="" 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 <input type="checkbox"/> NO <input type="checkbox"/>
Number of proposed development projects in review	N/A
Number of Priority Development Projects in review	N/A
Number of Priority Development Projects approved	N/A
Number of approved Priority Development Projects exempt from any BMP requirements	N/A
Number of approved Priority Development Projects allowed alternative compliance	N/A
Number of Priority Development Projects granted occupancy	N/A
Number of completed Priority Development Projects in inventory	N/A
Number of high Priority Development Project structural BMP inspections	N/A
Number of Priority Development Project structural BMP violations	N/A
Number of enforcement actions issued	N/A
Number of escalated enforcement actions issued	N/A

FY 2019-2020

VI. CONSTRUCTION MANAGEMENT PROGRAM					
Has the Copermittee implemented a construction management program that complies with Order No. R9-2013-0001?				YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Number of construction sites in inventory				0	
Number of active construction sites in inventory				0	
Number of inactive construction sites in inventory				0	
Number of construction sites closed/completed during reporting period				0	
Number of construction site inspections				N/A	
Number of construction site violations				N/A	
Number of enforcement actions issued				N/A	
Number of escalated enforcement actions issued				N/A	
VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM					
Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001?				YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	Municipal	Commercial	Industrial	Residential	
Number of facilities or areas in inventory	156	N/A	N/A	N/A	
Number of existing development inspections	154	N/A	N/A	N/A	
Number of follow-up inspections	0	N/A	N/A	N/A	
Number of violations	0	N/A	N/A	N/A	
Number of enforcement actions issued	N/A	N/A	N/A	N/A	
Number of escalated enforcement actions issued	N/A	N/A	N/A	N/A	
VIII. PUBLIC EDUCATION AND PARTICIPATION					
Has the Copermittee implemented a public education program component that complies with Order No. R9-2013-0001?				YES <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 <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 <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

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.

Matt Yeager

Digitally signed by Matt Yeager
DN: cn=Matt Yeager, ou=Riverside County Flood Control and Water
Conservation District, ou=Watershed Protection Division,
email=myeager@rivco.org, c=US
Date: 2021.01.27 14:59:51 -0800

Signature

MATT YEAGER

Print Name

(951) 955-0843

Telephone Number

JANUARY 25, 2021

Date

SENIOR FLOOD CONTROL PLANNER

Title

MYEAGER@RIVCO.ORG

Email

FISCAL ANALYSIS

- 1) The following table provides estimated expenditures for the current reporting period, the preceding reporting period, and the next reporting period. This table identifies the expenditures (such as capital, operation and maintenance, education, and administrative expenditures) necessary to accomplish the activities described in the Riverside County Flood Control and Water Conservation District JRMP as required under Section H.2 of the 2010 SMR MS4 Permit.

Program Element	Fiscal Year 2018-2019		Fiscal Year 2019-2020		Fiscal Year 2020-2021	
	Capital Expenditures	O&M/Admin Expenditures	Capital Expenditures	O&M/Admin Expenditures	Capital Expenditures	O&M/Admin Expenditures
Program Management¹	N/A	\$1,070,900	N/A	\$1,059,534	N/A	\$1,382,078
Annual Permit Fee	N/A	N/A	N/A	N/A	N/A	N/A
Implementation Agreement Shared Cost	N/A	N/A	N/A	N/A	N/A	N/A
Private Construction Inspections	N/A	N/A	N/A	N/A	N/A	N/A
Private Development Planning	N/A	N/A	N/A	N/A	N/A	N/A
Industrial and Commercial Inspections	N/A	N/A	N/A	N/A	N/A	N/A
Illicit Connections & Illegal Discharges Program²	N/A	Included in Program Mgmt.	N/A	Included in Program Mgmt.	N/A	Included in Program Mgmt.
Municipal Facilities and Activities²	N/A	Included in Program Mgmt.	N/A	Included in Program Mgmt.	N/A	Included in Program Mgmt.
Public Education & Outreach³	N/A	\$66,580	N/A	\$36,057	N/A	\$55,000
Monitoring Program	N/A	\$623,150	N/A	\$789,000	N/A	\$816,000
Retrofit Program	N/A	N/A	N/A	N/A	N/A	N/A
Other	N/A	N/A	N/A	N/A	N/A	N/A
Total	\$0	\$1,760,630	\$0	\$1,884,591	\$0	\$2,088,078

¹ Program Management includes all costs not directly listed in the Program Elements. Costs includes staffing, administration and overhead, consultant services and regional programs associated with program development.

² The District does not have individual costs associated with this program element. This cost is included in Program Management.

³ Costs for this element are not tracked separately from the District-Implemented Regional Programs and as such, shown costs are inclusive of costs incurred for implementing the regional element.

FISCAL ANALYSIS

2) A description of the source(s) of funds that are proposed to meet the necessary expenditures for the subsequent year.

Source of Funds	FY 2020-2021 Revenues	Percent of Total Program Funding	Restrictions on Use (if applicable)
Santa Margarita Watershed Benefit Assessment Fund (Projected Revenue)	\$530,000	26%	District NPDES compliance cost, excess funds used to fund regional NPDES activities
Santa Margarita Watershed Co-Permittee Implementation Agreement (Estimated Contributions)	\$1,525,114	74%	Fund Regional NPDES Compliance Programs
Total	2,055,114	100%	

3) Provide a narrative description of circumstances resulting in a 25 percent or greater annual change for any budget line item.

Program Element	Percent Budget Item Change	FYs with Change	Description
Program Management	30%	FY20-21	Additional technical consultants
Public Education and Outreach	53%	FY20-21	Additional social media consultants

6.2 STRATEGIES

Table A2-32. Riverside County Flood Control and Water Conservation District, Illicit Discharge Detection and Elimination Program Strategies

Number	Santa Margarita River Illicit Discharge Detection and Elimination Program Strategies - Riverside County Flood Control and Water Conservation District	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
IDDE-1	Promote a public reporting mechanism for incidental observations of IC/IDs.	●	●	A		<ul style="list-style-type: none"> The District operated a County-wide 1-800 hotline number and two web links to facilitate public reporting of ICIDs. An ICID web link was operated to specifically report ICIDs, while a non-ICID web link was operated to specifically report clogged storm drains, damaged facilities, and illegal disposal of bulk items. However, the non-ICID web link can also be used to report ICIDs if the end-user is already using it to report non-ICID issues. Therefore, in total, the District operated three reporting mechanisms to facilitate public reporting of ICIDs.
IDDE-2	Train municipal field staff to identify and report ICIDs.	●	●	A		<ul style="list-style-type: none"> ICIDs have historically entered District facilities through the Copermittees' MS4 networks, transportation corridors, and cross-lot drainage that extend beyond the District's jurisdiction and legal control. The District continued providing formal annual training to the permittees, field crews, and field contractors and introduced remote distance training as a result of COVID19 social distancing mandates. The District's senior ICID inspector, who is tasked with responding to every ICID complaint submitted to the District, also attends this training.

Table A2-32. Riverside County Flood Control and Water Conservation District, Illicit Discharge Detection and Elimination Program Strategies

Number	Santa Margarita River Illicit Discharge Detection and Elimination Program Strategies - Riverside County Flood Control and Water Conservation District	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
IDDE-3	Implement a District right-of-way inspection program to identify and report Illicit Connections and Discharges.	X	X	P		<ul style="list-style-type: none"> WPD received inter-departmental agreement to begin training O&M staff on inspections and documentation under the MS4 Outfall field screening program using ESRI's Survey 123 mobile application. As this will likely increase additional data and follow-up investigations, additional program structuring may be required. Training preparation is anticipated for the upcoming 2020-2021 monitoring year.
IDDE-4	Develop response procedures for homeless issue complaints to prevent or reduce trash and debris from entering receiving waters.	●	●	A		<ul style="list-style-type: none"> These procedures were developed and incorporated into Section 29 of the Safety and Operations Manual. The procedures are complete and implementation is ongoing.
IDDE-5	Identify areas with excessive water use	◐	◐	P		<ul style="list-style-type: none"> This was initially done as part of the WQIP development. The District is developing contacts with EMWD and RCWD to update the info and conduct a reevaluation.
IDDE-6	Assessment of Permitted flows	◐	◐	P		<ul style="list-style-type: none"> This study was initially scheduled to be completed by 2023. The District initiated discussions with water suppliers of the IRWM group.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-33. Riverside County Flood Control and Water Conservation District, Development Planning Program Strategies

Number	Santa Margarita River Development Planning Program Strategies - Riverside County Flood Control and Water Conservation District	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
DEV-1	Implement Updated BMP Design Manual.	●	●	A		<ul style="list-style-type: none"> The District reviews its WQMP for conformance with the BMP Design Manual on as as-needed basis. The District reviews all of its capital improvement projects to determine if these projects meet PDP applicability criteria. Typically, the District's dams, levees, channels, storm drains, and basins have not required WQMPs. Previously, the District led the development of the BMP Design Manual and will continue coordinating any updates with the Copermitees.
DEV-2	Update the BMP specifications (Soil mix, plant types, configuration) in the BMP Design Manual to enhance retention of nutrients.	●	●	P		<ul style="list-style-type: none"> The District continues assessing its onsite LID facilities to improve removal of nutrients based on previous evaluations of soil media, plant palettes, system configurations, and ease of maintenance. During this reporting period, the District continued to monitor its BMPs, sampling two storm events during the 19/20 wet season with additional storms being monitored to assess BMP hydrological properties. Further, Michael Baker Int. submitted their data review of the District's LID program in late July of 2020. The assessment suggests that revising BMP configurations may enhance their effectiveness at removing nutrients. The District will continue monitoring its BMPs throughout the coming years. The results are anticipated to determine further potential revisions to the BMP Design Manual.

Table A2-33. Riverside County Flood Control and Water Conservation District, Development Planning Program Strategies

Number	Santa Margarita River Development Planning Program Strategies - Riverside County Flood Control and Water Conservation District	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
DEV-3	Update the BMP Design Manual with landscape design and maintenance guidance	◐	●	P		<ul style="list-style-type: none"> Previously, the SMC Clean Project evaluated existing maintenance guidance for LID BMPs in which the District participated in its review. The District anticipates using this information to continue updating its BMP Design Manual as needed. The District also prepared educational materials and conducted outreach to landscape maintenance businesses to emphasize prevention of non-stormwater discharges, and encouraged these businesses to reduce the use of nutrients and pesticides.
DEV-4	Train staff on Updated BMP Design Manual.	◐	●	P		<ul style="list-style-type: none"> The District revised the training materials to include minimizing nutrient discharges.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-34. Riverside County Flood Control and Water Conservation District, Construction Management Program Strategies

Number	Santa Margarita River Construction Management Program Strategies – Riverside County Flood Control and Water Conservation District	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
CON-1	Train staff on implementation of BMPs that reduce the potential of HPWQC and PWQP loading, and are site specific and seasonally appropriate to the construction phase, year round.	●	●	A		<ul style="list-style-type: none"> During this reporting period, the District conducted a comprehensive review and update to the construction training program and tailored the modules to specific watershed issues. The District implemented the new training program in fall 2019 and spring 2020 and noted any opportunities for improvement. In the SMR region, the construction training module has been tailored to present BMP implementation techniques that may assist with reducing or eliminating HPWQC and PWQC loading.
CON-2	Require preparation and implementation of SWPPPs	●	●	A		<ul style="list-style-type: none"> The District continued requiring the preparation, review, and implementation of SWPPPs for its projects requiring Construction General Permit coverage per contract specifications. The District requires draft SWPPP documents to be prepared using the CASQA templates. Non-CGP projects are required to prepare and implement a Pollution Prevention Plan that addresses stormwater and non-stormwater discharges. The District requires all projects to implement minimum construction BMPs

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-35. Riverside County Flood Control and Water Conservation District, Existing Development Management Program Strategies

Number	Santa Margarita River Existing Development Management Program Strategies Riverside County Flood Control and Water Conservation District	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
ED-1	Inspect and maintain flood control facilities.	●	●	A		<ul style="list-style-type: none"> The District inspected and maintained its facilities. Where applicable, maintenance consisted of removing debris and sediment, repairing eroded slopes, maintaining vegetated areas, and ensuring the structural integrity of its inlets and outfalls, energy dissipaters, channel linings, and washouts.
ED-2	Inspect District outfalls and coordinate abatement activities with affected jurisdictions.	●	●	A		<ul style="list-style-type: none"> The District completed dry-weather field surveys at all of the major outfalls listed on its field screening inventory as per the MAP of the MS4 Permit. During these surveys, the District initiated source investigations of non-permitted discharges on behalf of the Copermittees and notified the respective Copermittees for follow-up as needed. The District also assisted the Copermittees by reporting flows discharging from their respective outfalls. This collaboration allowed the Copermittees to conduct follow-up investigations in a timely manner.
ED-3	Provide funding for Riverside County Fire Department HAZMAT Response Program.	●	●	A		<ul style="list-style-type: none"> The District continued providing funding to the Riverside County Fire Department for watershed-wide hazardous-material incident response and clean-up services.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-36. Riverside County Flood Control and Water Conservation District, Enforcement Response Plans Program Strategies

Number	Santa Margarita River Enforcement Response Plans Program Strategies Riverside County Flood Control and Water Conservation District	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
ERP-1	Require the implementation of the ERP to ensure proper use of BMPs to prevent or reduce the discharge of pollutants into MS4 networks.	●	●	A		<ul style="list-style-type: none"> During this reporting period's annual training for existing development, the District and Copermittees were presented with inspection and investigation scenarios that provided general guidance when implementing the ERP.
ERP-2	Require the implementation of the ERP to ensure that private construction activities comply with the Construction General Permit and Copermittees' Stormwater Ordinances.	●	●	A		<ul style="list-style-type: none"> During this reporting period's annual training for construction activities, the District and Copermittees were presented with inspection scenarios that provided general guidance when implementing the ERP.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-37. Riverside County Flood Control and Water Conservation District, Public Education and Participation Program Strategies

Number	Santa Margarita River Public Education and Participation Program Strategies Riverside County Flood Control and Water Conservation District	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
PubEd-1	Collaborate with watershed partners to develop consistent messaging to targeted audiences, such as commercial residents to conserve water and reduce dry weather flows.	●	●	A		<ul style="list-style-type: none"> The District and Copermittees continued implementing the five-year Strategic Plan program in a consistent and uniform approach. Key products included the development of overwatering door hangers and a dedicated overwatering webpage.
PubEd-2	Develop and provide outreach material to mobile landscape service providers that focuses on runoff and nutrient reduction.	●	●	A		<ul style="list-style-type: none"> The District developed and distributed an educational fact sheet for landscape service providers. The fact sheet encourages minimizing irrigation runoff and proper use, containment, and disposal of fertilizers and pesticides throughout existing development.
PubEd-3	Provide outreach presentations to elementary, middle, and high school students to ensure that environmental protection is addressed early-on during the academic process.	●	●	A		<ul style="list-style-type: none"> In the SMR region, 3 presentations were provided to 305 elementary and middle school students. On a county-wide basis, 51 presentations were provided to 2,840 students. These numbers reflect reduced access to school as COVID19-related restrictions resulted in closures throughout all local school districts.
PubEd-4	Enhanced Jurisdictional: Coordinate/develop outreach materials in support of Copermittee enhanced inspection, outreach & enforcement programs	◐	◐	P		<ul style="list-style-type: none"> The District anticipates that it will begin coordinating the development and distribution of informational brochures during the next reporting period for nurseries, vineyards, and horse ranches focusing on BMPs that reduce nutrients in runoff.

Table A2-37. Riverside County Flood Control and Water Conservation District, Public Education and Participation Program Strategies

Number	Santa Margarita River Public Education and Participation Program Strategies Riverside County Flood Control and Water Conservation District	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
PubEd-5	Enhanced Jurisdictional: Develop a webpage to ensure Copermittees and the general public have access to the latest NPDES information.	●	●	A		<ul style="list-style-type: none"> The District mapped new enhancements to its new website intended to encourage environmental stewardship throughout the county. The District anticipates that these enhancements will be ready for public use during the next reporting period.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-38. Riverside County Flood Control and Water Conservation District, Optional Jurisdictional Strategies

Number	Santa Margarita River Optional Jurisdictional Strategies Riverside County Flood Control and Water Conservation District	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
OPT-1	Perform infiltration- testing at District basins and outfalls to collect data to assess the feasibility of regional recharge facilities or individual infiltration BMPs.	X	◐	NT		<ul style="list-style-type: none"> The District conducted infiltration tests at basins within its jurisdiction between 2016 and November 2018. Currently, infiltration assessments of select outfalls are being considered based on information collected as part of the dry weather outfall field screening program. Outfalls with flowing or ponded conditions may in fact provide infiltration opportunities.
OPT-2	Partner with community groups to engage the public in promoting educational programs and community cleanups.	●	●	A		<ul style="list-style-type: none"> The District continued partnering with the County Fire Department to provide easily accessible HHW collection centers for residents and businesses. However, some HHW collection centers were temporarily closed during this reporting period due to state and county orders issued during the COVID-19 pandemic. The District notified the Regional Board regarding these closures in April 2020.
OPT-3	Evaluate the suitability of regional basins.	◐	◐	NT		<ul style="list-style-type: none"> This strategy was not triggered during this reporting period. The District is planning on installing a regional detention basin in the City of Wildomar. The design phase is moving forward and water quality features are being assessed for incorporation into the plans. It is anticipated that this basin will demonstrate whether or not regional basins are suitable BMPs in the SMR region.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

Table A2-39. Riverside County Flood Control and Water Conservation District, Optional WMA Strategies

Number	Santa Margarita River Optional WMA Strategies Riverside County Flood Control and Water Conservation District	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
WMA-1	Partner with Water District(s) on pilot projects to abate dry weather flows.	●	●	P		<ul style="list-style-type: none"> The District previously initiated discussions with water suppliers of the IRWM group to identify opportunities which could potentially support this strategy.
WMA-2	Coordinate incentive programs for reducing outdoor water use with Water Districts.	●	●	P		<ul style="list-style-type: none"> The District previously initiated discussions with water suppliers of the IRWM group to identify opportunities which could potentially support incentives and rebates. The District will continue seeking grants supporting water conservation efforts as they become available.
WMA-3	Update WMAA.	X	X	NT		<ul style="list-style-type: none"> This strategy was not triggered during this reporting period.
WMA-4	Update Water Quality Equivalency Calculations as part of the Alternative Compliance program.	X	X	NT		<ul style="list-style-type: none"> Updates to the WQE Guidance Document were completed in May 2018 and accepted by the SDRWQCB in March 2019. No further updates have occurred.
WMA-5	Submit Grant Applications to support the development and/or implementation of the WMAA and Alternative Compliance Program.	X	X	NT		<ul style="list-style-type: none"> This strategy was not triggered during this reporting period.
WMA-6	Develop a Stormwater Resources Plan.	●	●	A		<ul style="list-style-type: none"> The District finalized the Stormwater Resources Plan (SWRP) that identifies, prioritizes, and selects projects for funding consideration. The SWRP was forwarded to the IRWM group and the State for review and approval.

Table A2-39. Riverside County Flood Control and Water Conservation District, Optional WMA Strategies

Number	Santa Margarita River Optional WMA Strategies Riverside County Flood Control and Water Conservation District	FY19-20	FY20-21	Actual / Planned	Rationale for Modification to the Strategy	Comments
WMA-7	Coordinate with the SMR Nutrient Initiative Group to share watershed-related information.	●	●	A		<ul style="list-style-type: none"> During this reporting period, the District participated with the SMRNIG group in various Technical and Stakeholder Advisory Group meetings. The District continued providing and facilitating the compilation of data, as needed, in support of the SCCWRP technical team. Regular meetings occurred on 10/2/2019 and 3/12/2020.
WMA-8	Coordinate with the SMR IRWM group to share watershed-related information.	◐	◐	P		<ul style="list-style-type: none"> The District is a partner in the IRWM group and attends IRWM meetings. The main item for the District during this reporting period was discussion and submittal of the SWRP for inclusion in the IRWM plan. IRWM meetings have not been scheduled since March 2020 due to the COVID-19 pandemic.
WMA-9	Coordinate with the Consultation committee to provide updates and share watershed-related information.	◐	●	A		<ul style="list-style-type: none"> Following the acceptance of the WQIP in January 2019, the Consultation Committee agreed to meet on an as-needed basis. The meetings will resume during the next reporting period to support updates such as incorporating the requirements of the SMR Estuary Investigative Order into the WQIP. When COVID19-related restrictions are lifted, the District expects to resume discussions with water suppliers of the IRWM group to identify opportunities which could potentially support additional measures to further address watershed concerns.

Notes:

● - Fully implemented; ◐ - Partially Implemented, X – Not Implemented
A – Actual (active implementation), P – Planned (planning stage), NT-Not Triggered

6.3 MODIFICATIONS TO WQMP

The District has made a few minor edits to the WQMP document and added an updated map of the hydromodification exempt reaches. The revisions are provided as errata redlines below. The current WQMP is posted online at <http://content.rcflood.org/NPDES/SMRWMA.aspx>.

Redline Errata: WQMP Pages 97 – 98:

3.6.1. Projects Subject to Hydromodification Performance Standards

PDPs are subject to hydromodification performance standards unless exempted by the [Insert Jurisdiction]. Exemptions may be granted under each of the following conditions:

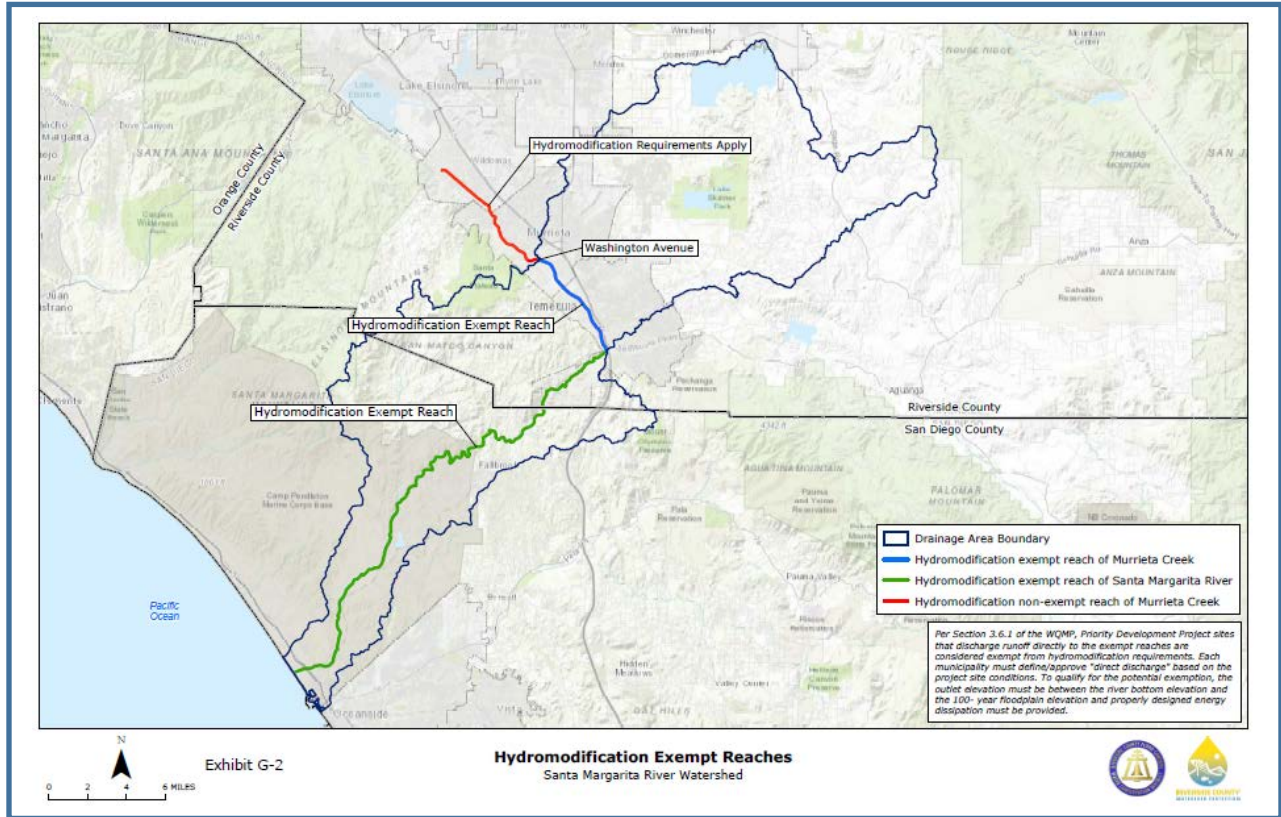
- If the project is not classified as PDP per Section 1.1; OR
- If the PDP discharges to an existing underground storm drain discharging directly to water storage reservoirs, lakes, enclosed embayments, or the Pacific Ocean; OR
- If the PDP discharges to a conveyance channel whose bed and bank are concrete lined all the way from the point of discharge to water storage reservoirs, lakes, enclosed embayments, or the Pacific Ocean; OR
- If the PDP discharges runoff directly to an exempt stream/river reach ~~or an exempt reservoir~~ as identified in an approved WMAA. The WQIP and the WMAA were accepted by the Water Board; as of November 27, 2018 the following exemptions are in effect:
 - Santa Margarita River
 - Upstream Limit: At Origin, i.e. Confluence with Temecula Creek and Murrieta Creek
 - Downstream Limit: Outfall to Pacific Ocean
 - Murrieta Creek
 - Upstream Limit: ~~850 feet upstream of Hawthorn Street~~ Washington Avenue
 - Downstream Limit: Confluence with Santa Margarita River ~~(the WMAA is not currently approved so no such exemptions are currently available).~~

~~Each municipality must define/approve "direct discharge" based on the project site conditions. To qualify for the potential exemption, the outlet elevation must be between the river bottom elevation and the 100- year floodplain elevation and properly designed energy dissipation must be provided (from Section 4.5 of the 2018 SMR Watershed Management Area Analysis).~~

It should be noted that all PDPs are subject to the LID and water quality treatment requirements even if they are not subject to Hydromodification Performance Standards.

In addition, the User should note that properly designed energy dissipation systems are required for all project outfalls to unlined channels.

REVISED EXHIBIT G-2



----- End of WQMP redline errata

6.4 MODIFICATIONS TO THE JRMP

In FY 2019-2020, the Riverside Flood Control and Water Conservation District completed a variety of administrative updates, listed below, to its JRMP.

- Replaced "JRMP" with "Plan" to differentiate between the program (JRMP) and its implementation document (Plan).
- Replaced "SMR" with "Regional" to denote the current MS4 Permit. Deleted references to the 2010 MS4 Permit where appropriate.
- Replaced "Department" with "Division" consistent with the District's organizational nomenclature.
- Removed "JRMP" from "WQIP/JRMP Annual Report." The JRMP reporting forms are now an appendix to the WQIP Annual Report.
- Used "District Right-of-Way and Easement" to denote the extent of the District's jurisdiction.
- Added or corrected references to specific permit provisions.
- Updated website addresses and telephone numbers.
- Provided specific appendix locations (e.g., Appendix B.4 rather than Appendix B).
- Identified non-jurisdictional areas as those including federal, state and tribal lands.
- Replaced "District Development Review Section" with "County Planning Department."
- Removed redundant references to "SMR."

Additional details to changes made are available upon request. The current JRMP is posted online at <http://content.rcflood.org/NPDES/SMRWMA.aspx>.

6.5 CORRESPONDENCE REGARDING COMPLIANCE DURING THE COVID-19 PANDEMIC

The Riverside Flood Control and Water Conservation District sent a letter to the San Diego Water Board describing the impacts of the COVID-19 pandemic and associated public health orders on its stormwater program. The District's letter and the San Diego Water Board's response are provided in this section.



RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

April 8, 2020

Sent via electronic mail:
SanDiego@waterboards.ca.gov

Mr. David W. Gibson
Executive Officer
San Diego Regional Water Quality Control Board
2375 Northside Dr., Suite 100
San Diego, CA 92108-0002

Dear Mr. Gibson:

Re: Initial Notification and Preliminary Assessment of Impact of COVID-19 Public Health Emergency on Compliance with San Diego Region NPDES Municipal Separate Storm Sewer System (MS4) Permit and Related Orders

On March 20, 2020, the San Diego Water Board (Water Board) and the State Water Resources Control Board (State Board) provided a notice, *Compliance with Water Board Requirements during the Coronavirus 2019 (COVID-19) Emergency* (COVID-19 Notice), detailing how MS4 permittees were to advise the Water Boards concerning potential non-compliance with the MS4 permit and other order requirements due to the COVID-19 public health emergency. In accordance with that notice, this letter provides the initial response of the Riverside County Flood Control and Water Conservation District (District) to this notice and sets forth the District's preliminary assessment concerning compliance with the above-referenced MS4 permit and related orders.

This letter responds to the following COVID-19 Notice requirement:

"If there is a specific Water Board order or requirement that cannot be timely met because it would be inconsistent with current governmental directives or guidelines related to COVID-19, the entity responsible for compliance with the Water Board order or requirement must notify the applicable Water Board immediately. The notification shall be via electronic mail to the applicable Water Board using the appropriate email address identified below, and shall include:

- the specific Water Board order, regulation, permit, or other requirement that cannot be timely met;
- the inconsistent COVID-19 directive or guideline,
- an explanation of why the responsible entity cannot timely meet the Water Board order or requirement, and
- any action that the entity will take in lieu of complying with the specific Water Board order or requirement."

April 8, 2020

Mr. David W. Gibson

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Re: Initial Notification and Preliminary Assessment of Impact of COVID-19 Public Health Emergency on Compliance with San Diego Region NPDES Municipal Separate Storm Sewer System (MS4) Permit and Related Orders

In recent weeks, in response to the COVID-19 crisis, the Governor and Riverside County have issued several public health orders, and District operations have been modified in various ways in response to those orders, particularly in response to social distancing requirements. District personnel are continuing to evaluate how the COVID-19 emergency is affecting, and will affect, compliance with the MS4 Permit and other orders. This is a complex evaluation, requiring an assessment not only of District staff capabilities but also those of the Co-permittees, consultants, laboratories and other entities. At this time, the District cannot provide the detailed analysis required by the State Board's notice for all affected compliance activities. However, we have identified several MS4 compliance actions that cannot be implemented as scheduled, and these actions are described in detail below. The District expects to provide more detailed information regarding the extent of COVID-19 impacts to MS4 compliance actions in the near future once we have completed a more detailed analysis.

Status of Riverside County Public Health Orders Concerning COVID-19

In addition to the State of Emergency declared by the Governor on March 4, 2020 and the Governor's Executive Order N-33-20 issued on March 19, 2020, which imposed social distancing measures and directed all individuals in California to stay at their place of residence except as needed to maintain continuity of operations of critical infrastructure sectors, Riverside County health authorities have also issued a number of COVID-19 related orders. On March 8, 2020, the County of Riverside Public Health Officer, Dr. Cameron Kaiser, declared a local health emergency, citing the County's first locally acquired case of COVID-19. Since that time, more than a dozen public health orders have been issued by Dr. Kaiser, including cancellation of public events (March 12), closure of schools (March 13), cancellation of meetings of more than 10 individuals, closure of County buildings to the public (March 17), and extending the period of closure for schools and colleges (March 18 and April 1). On April 4, Dr. Kaiser issued a further order with a prohibition on all gatherings regardless of venue or size with very limited exceptions, a requirement that all persons including essential workers wear face coverings whenever they leave their home, and a commitment from law enforcement to enforce the order. Public safety requirements continue to evolve, and health and safety restrictions are expected to become more stringent for an extended period of 2020. Riverside County COVID-19 Orders can be found at: <https://www.rivcoph.org/coronavirus>.

Notification of District Compliance Activities That Cannot Be Timely Met

As noted above, the District has identified several activities required under the MS4 Permit, Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2015-0100, that cannot be performed at this time due to the restrictions imposed by the COVID-19 orders referenced above. In accordance with the State Board's COVID-19 Notice, we describe below the activities impacted and the respective inconsistent COVID-19 order, provide an explanation as to why the requirement cannot be timely met and note planned in-lieu or alternative actions.

Mr. David W. Gibson

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April 8, 2020

Re: Initial Notification and Preliminary Assessment of Impact of COVID-19 Public Health Emergency on Compliance with San Diego Region NPDES Municipal Separate Storm Sewer System (MS4) Permit and Related Orders

- **HHW and ABOP Events: Public Education and Participation Program (Provision II.E.7.a.(2); District JRMP Section 11.0)**
 - In compliance with this requirement, the District provides significant funding annually to the Riverside County Department of Waste Resources (RCDWR) to help enable RCDWR to both promote and provide facilities and events for the safe disposal of household hazardous wastes.
 - To comply the social distancing requirements in the County's public health orders and Executive Order N-33-20, RCDWR has been required to cancel all community cleanup events, hazardous waste collection events, community outreach classes, education center visits, resource garden visits and speaking engagements through April 30, 2020. Considering the recent extension of school closures to June 29. It is anticipated additional activities scheduled through June 2020 may also be canceled.
 - We expect that these RCDWR activities will resume as soon as COVID-19 restrictions are lifted. However, information regarding the safe disposal of household hazardous waste continues to be available on the RCDWR website.

- **Household Hazardous Waste (HHW) (District JRMP Section 4.2.1.1: HHW Collection and Anti-freeze, Batteries, Oil and Latex Paint (ABOP) Collection Programs)**
 - The District supports the HHW and ABOP collection programs to help prevent illegal dumping and discharges. These programs include mobile HHW collection events at sites in the Santa Margarita Region scheduled periodically on weekends. One permanent ABOP collection site is located at the County Maintenance Yard in the city of Murrieta.
 - For the reasons stated above, programs provided through RCDWR, including HHW and ABOP collection services as described in the District Jurisdictional Runoff Management Program (JRMP), must be canceled through April 30, 2020.
 - We expect that these RCDWR activities will resume as soon as COVID-19 restrictions are lifted. However, for the time being, information regarding the safe disposal of household hazardous waste continues to be available on the RCDWR website.

- **School Presentations: Public Education and Participation Program (Provision II.E.7.a.(3); District JRMP Section 11.2.2)**
 - Pursuant to this provision and as described in the District's JRMP document, the District administers a program of water pollution-themed elementary school classroom presentations. The most recent activity under this program, a presentation to 300 students at E. Hale Curran Elementary School in the city of Murrieta, was conducted on March 11, 2020.
 - All in-person school presentations have been suspended due to the Countywide closure of all schools following the County's public health orders of March 13, March 18 and April 4.

Mr. David W. Gibson

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April 8, 2020

Re: Initial Notification and Preliminary Assessment of Impact of COVID-19 Public Health Emergency on Compliance with San Diego Region NPDES Municipal Separate Storm Sewer System (MS4) Permit and Related Orders

The District is currently evaluating the conversion of its classroom materials and instruction to a digital format for future use. This will require coordination with school districts that are conducting online educational programs for their students.

- **District and Co-permittee Staff Training (Provision II.E.7.a.(3); District JRMP: Section 11.3, Table 11-2, and Section 12.0)**
 - On behalf of the Co-permittees, the District develops training materials and provides a training program for District and Co-permittee staff, which includes in-person group training events. In addition, training modules have been developed to support online training for several training topic areas.
 - In compliance with the prohibition on meetings of any size, all in-person training events have been suspended. In-person training classes that were scheduled for April 2020 will be rescheduled for May or June 2020 provided that COVID-19 orders allow them.
 - The District is currently working with the training contractors to develop additional online training modules so that online training options will be available to the Co-permittees for all required training topic areas.

This information is based on the District's current knowledge. As additional MS4 Permit compliance concerns come to the District's attention, we will update the Water Board.

Additional Areas of Potential Compliance Concern for the Co-permittees

As you know, the District is Principal Co-permittee for the Santa Margarita River Watershed Management Area and performs many MS4 Permit compliance functions for the Co-permittees pursuant to an Implementation Agreement. However, certain permit compliance functions remain the responsibility of the Co-permittees. Based on preliminary discussions with Co-permittees and the District's initial evaluation of areas of compliance concern, we have outlined for the Water Board's information several Co-permittee program areas that may be impacted by the requirement to comply with COVID-19 orders. **We want to stress that this evaluation is preliminary and is likely subject to change. We expect that the Co-permittees will update the Water Board with additional information on the impact of COVID-19 orders on their compliance actions.**

- **Field Inspection Requirements**
 - The MS4 Permit requires the Co-permittees to conduct inspections for construction sites (Provision II.E.4.d), existing development (industrial/commercial sites, residential areas, and municipal facilities and areas: Provision II.E.5.c), structural BMPs (Provision II.E.3.e), and non-emergency IC/ID inspections or investigations (Provision II.E.2.d). We understand that the ability to conduct such non-emergency inspections may be impacted by social distancing requirements or other staff restrictions such as requirements to work from home. We understand that emergency water quality IC/ID inspections will in any event continue to be undertaken by the Co-permittees.

April 8, 2020

Mr. David W. Gibson

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Re: Initial Notification and Preliminary
Assessment of Impact of COVID-19
Public Health Emergency on
Compliance with San Diego
Region NPDES Municipal Separate
Storm Sewer System (MS4) Permit
and Related Orders

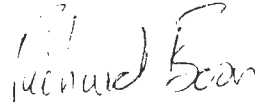
• **Public Education and Participation (Provision II.E.7)**

- Public messaging opportunities may be reduced due to closure of public facilities and the prohibition on gatherings;
- Local events with public outreach opportunities will likely be canceled or suspended;
- HHW/ABOP events hosted by the Co-permittees will likely be canceled or suspended;
- Cleanup events may be canceled or suspended.

As noted above, we anticipate that the Co-permittees will provide more detailed information to the Water Board concerning impacts on their individual MS4 permit compliance efforts as that information becomes available and is further evaluated by them.

Please contact me with any questions at 951.955.1273 or rboon@rivco.org.

Very truly yours,



RICHARD J. BOON

Chief of Watershed Protection Division

c: Laurie Walsh, P.E.
Santa Margarita Watershed MS4 Co-permittees

RB:rlp



San Diego Regional Water Quality Control Board

June 16, 2020

Sent by Email Only

Richard Boone
Chief of Watershed Protection Division
Riverside County Flood Control and
Water Conservation District
1995 Market Street
Riverside, CA 92501
rboon@rivco.org

In reply refer to/ attn:
252906:ERyan

Subject: Request for Compliance Relief due to COVID-19 Emergency, National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds within the San Diego Region, Order No. R9-2013-0001, as Amended, NPDES No. CAS0109266 (Order)

Mr. Boone:

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) received your letter dated April 8, 2020, from the Riverside County Flood Control and Water Conservation District (District) regarding actual or potential noncompliance with requirements of the Order that could occur during the COVID-19 emergency. The District's letter requests relief from specific requirements set forth below that the District believes are inconsistent with the stay-at-home and social distancing restrictions imposed by Governor Newsom's Executive Order No. N-33-20 or the Riverside County Public Health Officer's directives.

- 1. Public Education and Outreach for Household Hazardous Waste (HHW) and Anti-freeze, Batteries, Oil and Latex Paint (ABOP) Collection and Disposal.** Provision E.7.a.(2) requires that the District implement educational activities, public information activities, and other appropriate outreach activities to facilitate the proper management and disposal of used oil and toxic materials which includes HHW and ABOP materials. The District reports that due to the governmental social distancing restrictions, public outreach and education activities scheduled through the County of Riverside for HHW and ABOP collection services have been suspended. The District's letter indicates that these activities will resume when the governmental

HENRY ABARBANEL, PH.D., CHAIR | DAVID GIBSON, EXECUTIVE OFFICER

2375 Northside Drive, Suite 100, San Diego, California 92108-2700 | www.waterboards.ca.gov/sandiego

social distancing restrictions are lifted. Alternative methods of disseminating information on the safe disposal of HHW through the District's web site are continuing.

2. Public Education and Outreach for Schools.

Public education and outreach activities for school-aged children are required under provision E.7.a (3) of the Order. The District reports that in light of the ongoing governmental social distancing restrictions and school closures, public outreach and education activities scheduled for schools have been suspended. The District is currently evaluating on-line conversion of its educational materials and activities for future use in educational outreach activities at schools.

3. Education and Outreach for District and Copermittee Staff Training on Various Topics.

Training for agency staff on various topics pertaining to the prevention of pollutants from entering the MS4 is required under provision E.7.a (3) of the Order. The District develops training materials and conducts training sessions for District staff and the Riverside County Copermittees' staff. In light of governmental social distancing restrictions, all in-person training and education activities have been suspended. The District intends to eventually reschedule these training sessions as allowed by governmental restrictions. The District reports that they are working with contractors to develop on-line training options on all required training topics.

4. General Notification and Preliminary Request for Compliance Relief on Behalf of Other Copermittees.

The District's April 8, 2020 letter also comments on behalf of the other Copermittees in Riverside County, that these Copermittees may have difficulty meeting certain requirements of the Order where compliance activities are impacted by the governmental stay-at-home and social distancing restrictions. The requirements include public education and outreach requirements in provision E.7.a.(2) and (3) of the Order; and the June 30, 2020 deadline to complete field inspections to comply with the requirements of provisions E.2.d (illicit connection/ Illicit detection (IC/ID) inspections or investigations), E.3.e (structural BMP verifications), E.4.d (construction sites), and E.5.c (inventoried existing development sites) of the Order.

Determinations on the Notifications of Suspension of Activities

The San Diego Water Board continues to closely monitor the COVID-19 situation with a focus on protection of public health, safety, and the environment and continuity of timely compliance by the regulated community with all Water Board orders and other requirements is among the highest priorities. The San Diego Water Board recognizes the challenges posed by COVID-19, values the safety of the regulated community and the public, and does not want to put anyone at risk for contracting COVID-19.

The San Diego Water Board has evaluated the District's requests in accordance with these principles and the recently issued State Water Resources Control Board (State Water Board) guidance regarding permit compliance obligations in light of COVID-19. Under the current circumstances and based on the preliminary information provided by

the District in the April 8, 2020 letter, the San Diego Water Board has made the following determinations regarding the requests for compliance relief due to the COVID-19 emergency:

- 1. Public Education and Public Participation.** Public education and public participation requirements of provision E.7 of the Order pertaining to in-person activities by the District that are incompatible with current directives of Governor Newsom's Executive Order N-33-20 or the Riverside County Public Health Officer related to COVID-19 are suspended. This suspension of public education and outreach requirements in provision E.7 of the Order for incompatible in-person activities is effective immediately and is only in effect until the District is notified by the San Diego Water Board to resume all public education and participation activities in accordance with the requirements of the Order. The District is expected to continue to make available and disseminate public education messages via its website, e-mail, social media, and other remote means, as appropriate under the requirements of provision E.7 of the Order and compatible with governmental directives related to COVID-19.

- 2. General Notification and Request for Relief on Behalf of Other Copermittees.** The District's letter addresses several concerns on behalf of the other Riverside County Copermittees pertaining to field inspection, public education, and public participation requirements of the Order. The preliminary blanket request for compliance relief pertaining to these requirements submitted on behalf of the other Riverside County Copermittees is denied.

In accordance with the State Water Board Guidance, *Compliance with Water Board Requirements During the Coronavirus 2019 (COVID-19) Emergency*, each Copermittee must notify the San Diego Water Board separately if a specific requirement(s) of the Order cannot be timely met. As stated in the State Water Board's guidance, the specific entity responsible for compliance must notify the San Diego Water Board if timely compliance with a specific Water Board order or requirement would not be consistent with current governmental directives and guidelines related to COVID-19. The notification must include the following:

- The specific Water Board order, regulation, permit, or other requirement that cannot be timely met;
- The inconsistent COVID-19 directive or guideline;
- An explanation of why the responsible entity cannot timely meet the Water Board Order or requirement; and
- Any action that the entity will take in lieu of complying with the specific Water Board Order or requirement.

Except as otherwise stipulated in the San Diego Water Board determinations above, all the requirements of the Order remain in full force and effect. In the event that circumstances change to allow for compliance with the Order, the District must notify

the San Diego Water Board immediately of the change in circumstances and comply with the Order as soon as possible.

The San Diego Water Board appreciates your assistance and efforts to continue the important work to protect human health and the environment, while ensuring the safety of your employees and the community we seek to protect. Additional information is available at the State Water Board's website (https://www.waterboards.ca.gov/resources/covid-19_updates).

In the subject line of any response please include the reference number 252906:ERyan. If you have any questions or concerns, please feel free to reach out to Erica Ryan at Erica.Ryan@waterboards.ca.gov.

Respectfully,

David W. Gibson
Digitally signed by David W. Gibson
Date: 2020.06.16 12:54:58 -07'00'
David W. Gibson
Executive Officer

DWG:kd;db;lw;er

cc: Erica Ryan, San Diego Water Board, Erica.Ryan@waterboards.ca.gov
Laurie Walsh, San Diego Water Board, Laurie.Walsh@waterboards.ca.gov
Chiara Clemente, San Diego Water Board, Chiara.Clemente@waterboards.ca.gov
David Barker, San Diego Water Board, David.Barker@waterboards.ca.gov
Catherine Hagan, State Water Board, Catherine.Hagan@waterboards.ca.gov
Vincent Vu, State Water Board, Vincent.Vu@waterboards.ca.gov
David Boyers, State Water Board, David.Boyers@waterboards.ca.gov

Tech Staff Info & Use	
Order No.	R9-2013-0001, as amended
Party ID	539698
WDID	9 33M1000301 – 488788
NPDES No.	CA0109266
Reg. Measure ID	387335 (Regional MS4 Permit)
Place ID (PIN)	CW-252906

7 COUNTY OF SAN DIEGO

7.1 JRMP ANNUAL REPORT

ATTACHMENT D
JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM
ANNUAL REPORT FORM

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JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM
ANNUAL REPORT FORM - DRAFT
 FY 2019-2020

I. COPERMITTEE INFORMATION	
I.A Copermittee Name: <u>County of San Diego (PIN 255223)</u>	
I.B Copermittee Primary Contact Name: <u>Todd Snyder</u>	
I.C Copermittee Primary Contact Information: Address: <u>5510 Overland Avenue, Suite 410</u> City: <u>San Diego</u> County: <u>San Diego</u> State: <u>California</u> Zip: <u>92123</u> Telephone: <u>(858) 694-3672</u> Fax: <u>(858) 495-5623</u> Email: <u>Todd.Snyder@sdcounty.ca.gov</u>	
II. LEGAL AUTHORITY	
II.A 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 <input checked="" type="checkbox"/> NO <input type="checkbox"/>
II.B 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	
III.A Was an update of the jurisdictional runoff management program document required or recommended by the San Diego Water Board?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
III.B 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 type="checkbox"/> NO <input type="checkbox"/>
IV. ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM	
IV.A Has the Copermittee implemented a program to actively detect and eliminate illicit discharges and connections to its MS4 that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
IV.B.1 Number of non-storm water discharges reported by the public	290
IV.B.2 Number of non-storm water discharges detected by Copermittee staff or contractors	113
IV.B.3 Number of non-storm water discharges investigated by the Copermittee	403
IV.B.4 Number of sources of non-storm water discharges identified	133
IV.B.5 Number of non-storm water discharges eliminated	105
IV.B.6 Number of sources of illicit discharges or connections identified	106
IV.B.7 Number of illicit discharges or connections eliminated	94
IV.B.8 Number of enforcement actions issued	99
IV.B.9 Number of escalated enforcement actions issued	4
V. DEVELOPMENT PLANNING PROGRAM	
V.A Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
V.B Was an update to the BMP Design Manual required or recommended by the San Diego Water Board?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
V.C If YES to the question above, did the Copermittee update its BMP Design Manual and make it available on the Regional Clearinghouse?	YES <input type="checkbox"/> NO <input type="checkbox"/>
V.D.1 Number of proposed development projects in review	1,071
V.D.2 Number of Priority Development Projects in review	80
V.D.3 Number of Priority Development Projects approved	60
V.D.4 Number of approved Priority Development Projects exempt from any BMP requirements	0
V.D.5 Number of approved Priority Development Projects allowed alternative compliance	0
V.D.6 Number of Priority Development Projects granted occupancy	26
V.E.1 Number of completed Priority Development Projects in inventory	444
V.E.2 Number of high priority Priority Development Project structural BMP inspections	2,696
V.E.3 Number of Priority Development Project structural BMP violations	314
V.E.4 Number of enforcement actions issued	282
V.E.5 Number of escalated enforcement actions issued	0

**JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM
ANNUAL REPORT FORM - DRAFT**

FY 2019-2020

VI. CONSTRUCTION MANAGEMENT PROGRAM					
VI. A Has the Copermittee implemented a construction management program that complies with Order No. R9-2013-0001?				YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
VI.B.1	Number of construction sites in inventory			3,626	
VI.B.2	Number of active construction sites in inventory			3,543	
VI.B.3	Number of inactive construction sites in inventory			0	
VI.B.4	Number of construction sites closed/completed during reporting period			1,651	
VI.B.5	Number of construction site inspections			22,470	
VI.B.6	Number of construction site violations			241	
VI.B.7	Number of enforcement actions issued			317	
VI.B.8	Number of escalated enforcement actions issued			162	
VII. EXISTING DEVELOPMENT MANAGEMENT PROGRAM					
VII.A Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001?				YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
		Municipal	Commercial	Industrial	Residential
VII.B.1	Number of facilities or areas in inventory	a. 252	b. 1,862	c. 202	d. 110
VII.B.2	Number of existing development inspections	a. 1,988	b. 931	c. 175	d. 865
VII.B.3	Number of follow-up inspections	a. 1	b. 176	c. 35	d. 352
VII.B.4	Number of violations	a. 0	b. 618	c. 99	d. 725
VII.B.5	Number of enforcement actions issued	a. 0	b. 203	c. 40	d. 343
VII.B.6	Number of escalated enforcement actions issued	a. 0	b. 0	c. 2	d. 57
VIII. PUBLIC EDUCATION AND PARTICIPATION					
VIII.A Has the Copermittee implemented a public education program component that complies with Order No. R9-2013-0001?				YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
VIII.B Has the Copermittee implemented a public participation program component that complies with Order No. R9-2013-0001?				YES <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 <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

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.

Sarah
Aghassi
Signature
Sarah E. Aghassi
Print Name
(619) 531-5451
Telephone Number

Digitally signed by Sarah
Aghassi
Date: 2021.01.15
14:51:14 -08'00'

January 15, 2021
Date
Land Use and Environment Group
Deputy Chief Administrative Officer
Title
Sarah.Aghassi@sdcounty.ca.gov
Email

ATTACHMENT D.1

**JURISDICTIONAL RUNOFF MANAGEMENT PROGRAM
ANNUAL REPORT FORM BY WATERSHED**

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Attachment D.1

IRMP ANNUAL REPORT ATTACHMENT D.1 by WATERSHED		Santa Margarita	San Luis Rey	Cajalmar	San Dieguito	Penasquitos	San Diego River	San Diego Bay	Tijuana River	Jurisdiction Totals
Fiscal Year 2019-2020		HU 902.00	HU 903.00	HU 904.00	HU 905.00	HA 906.10 & 906.20	HU 907.00	HA 908.00, 909.00, & 910.00	HU 911.00	
IV.	ILLEGAL DISCHARGE DETECTION AND ELIMINATION PROGRAM									
IV.B.1	Number of non-storm water discharges reported by the public	14	64	40	23	1	64	77	7	290
IV.B.2	Number of non-storm water discharges detected by Department staff or contractors	16	15	10	20	0	34	18	0	113
IV.B.3	Number of non-storm water discharges investigated by the Department	30	79	50	43	1	98	95	7	403
IV.B.4	Number of sources of non-storm water discharges identified	13	27	16	17	1	30	28	1	133
IV.B.5	Number of non-storm water discharges eliminated	10	23	8	14	0	25	25	0	105
IV.B.6	Number of sources of illicit discharges or connections identified	12	20	10	16	1	23	24	0	106
IV.B.7	Number of illicit discharges or connections eliminated	9	20	8	14	0	21	22	0	94
IV.B.8	Number of enforcement actions issued	7	24	14	13	1	25	15	0	99
IV.B.9	Number of escalated enforcement actions issued	0	0	2	0	0	1	1	0	4
V.	DEVELOPMENT PLANNING PROGRAM									
V.D.1	Number of proposed development projects in review ¹	38	194	133	179	0	217	244	67	1071
V.D.2	Number of Priority Development Projects in review	1	16	8	7	0	18	17	13	80
V.D.3	Number of Priority Development Projects approved	0	15	7	6	0	12	10	10	60
V.D.4	Number of approved Priority Development Projects exempt from any BMP requirements	0	0	0	0	0	0	0	0	0
V.D.5	Number of approved Priority Development Projects allowed alternative compliance	0	0	0	0	0	0	0	0	0
V.D.6	Number of Priority Development Projects granted occupancy	0	10	3	7	0	3	2	1	26
V.E.1	Number of completed Priority Development Projects in inventory	10	69	63	105	0	83	95	19	444
V.E.2	Number of High priority Priority Development Project structural BMP inspections	53	302	208	394	0	796	805	138	2696
V.E.3	Number of Priority Development Project structural BMP violations	5	67	9	162	0	20	24	27	314
V.E.4	Number of enforcement actions issued	5	35	9	168	0	17	22	26	282
V.E.5	Number of escalated enforcement actions issued	0	0	0	0	0	0	0	0	0
VI.	CONSTRUCTION MANAGEMENT PROGRAM									
VI.B.1	Number of construction sites in inventory ¹	102	950	668	650	4	470	690	93	3626
VI.B.2	Number of active construction sites in inventory ¹	98	938	652	634	4	453	675	90	3543
VI.B.3	Number of inactive construction sites in inventory	0	0	0	0	0	0	0	0	0
VI.B.4	Number of construction sites closed/completed during reporting period	38	514	338	287	2	176	263	33	1651
VI.B.5	Number of construction site inspections ²	430	6336	4558	3518	11	2658	3912	1048	22470
VI.B.6	Number of construction site violations	6	85	17	25	0	45	59	4	241
VI.B.7	Number of enforcement actions issued	8	105	37	41	6	44	65	11	317
VI.B.8	Number of escalated enforcement actions issued	2	50	16	21	0	22	47	4	162
VII.	EXISTING DEVELOPMENT MANAGEMENT PROGRAM									
VII.B.1	Number of facilities or areas in inventory	8	23	26	32	5	58	77	23	252
	a. Municipal	175	303	200	219	3	488	444	30	1862
	b. Commercial	15	13	8	43	0	71	48	4	202
	c. Industrial	12	11	11	22	1	15	21	17	110
	d. Residential	59	214	209	305	22	620	402	157	1988
VII.B.2	Number of existing development inspections	131	147	68	126	0	278	159	22	931
	a. Municipal	20	11	11	27	0	69	33	4	175
	b. Commercial	19	204	107	277	0	155	101	2	865
	c. Industrial	0	0	0	0	0	0	0	1	1
	d. Residential	32	31	18	18	0	44	31	2	176
VII.B.3	Number of follow-up inspections	5	1	2	2	0	19	6	0	35
	a. Municipal	1	85	42	138	0	47	39	0	352
	b. Commercial	0	0	0	0	0	0	0	0	0
	c. Industrial	127	88	67	72	0	149	102	13	618
	d. Residential	8	2	5	7	0	52	25	0	99
VII.B.4	Number of violations	5	183	103	257	0	93	84	0	725
	a. Municipal	0	0	0	0	0	0	0	0	0
	b. Commercial	42	32	20	22	0	47	37	3	203
	c. Industrial	5	1	2	3	0	22	7	0	40
	d. Residential	1	85	48	128	0	40	42	0	343
VII.B.5	Number of enforcement actions issued	0	0	0	0	0	0	0	0	0
	a. Municipal	0	0	0	0	0	0	0	0	0
	b. Commercial	0	0	0	0	0	0	0	0	0
	c. Industrial	0	0	0	0	0	0	0	0	0
	d. Residential	0	0	0	0	0	0	0	0	0
VII.B.6	Number of escalated enforcement actions issued	0	0	0	0	0	0	0	0	0
	a. Municipal	0	0	0	0	0	0	0	0	0
	b. Commercial	0	0	0	0	0	0	0	0	0
	c. Industrial	0	0	0	0	0	0	0	0	0
	d. Residential	0	10	10	24	0	3	10	0	57

Notes:
 HU - hydrologic unit
 HA - hydrologic area
 1. Subtracted "1" from Jurisdictional Totals since one facility was counted for two watersheds
 2. Subtracted "1" from Jurisdictional Totals since one facility was counted for two watersheds and had 1 inspection in the fiscal year

ATTACHMENT D.2

**JURISDICTIONAL RUNOFF MANAGEMENT
PROGRAM ANNUAL REPORT FISCAL ANALYSIS**

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**Transitional Jurisdictional Runoff Management Plan
Annual Report Fiscal Year 2019-2020**

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FISCAL ANALYSIS COMPONENT

1.1. Introduction

This section presents an estimated annual budget for the County's runoff management programs for FY 2019-20.

1.2. Fiscal Analysis Methods

This section continues to utilize the methodologies and standards established in *Fiscal Analysis Method* submitted by the Copermittees in January 2009.

1.3. Fiscal Analysis Results

As shown the County estimated its total FY 2019-20 expenditures at \$56,580,333. This fiscal analysis addresses each of the County's Runoff Management Program elements (jurisdictional, watershed, and regional activities) for the current reporting period (FY 2019-20). Expenditures are described by department and major program area. They represent an estimate of the expenditures that the County incurred in meeting its compliance obligations for FY 2019-20. They should not be interpreted as either budgeted or actual expenditures. Because stormwater program expenditures are distributed throughout a considerable number of County programs, a single consolidated "budget" does not exist for the program as a whole. As such, these figures should be considered best estimates of stormwater-related expenditures.

**Transitional Jurisdictional Runoff Management Plan
Annual Report Fiscal Year 2019-2020**

1.3.1 Expenditures

1.3.1.1. Jurisdictional

Table 1.1 presents the County’s estimated jurisdictional expenditures for FY 2019-20.

Table 1.1 – Estimated Jurisdictional Expenditures for FY 2019-20

Jurisdictional Worksheet Component			Explanation/Notes
1	ADMINISTRATION	\$10,827,700	These costs correspond to the DPW WPP development, administrative oversight, and assessment of the County’s stormwater programs. The WPP is responsible for the development of new and augmented County stormwater programs, regulatory reporting, and program assessment. Some administrative costs are associated with other specific functions shown below, but are included here because they could not be separated out.
2	DEVELOPMENT PLANNING	\$2,393,183	
A	Land Use Planning	<u>\$0</u>	Expenditures not reported for FY 2019-20; included in other elements.
B	Environmental Review	<u>\$0</u>	Expenditures not reported for FY 2019-20; included in other elements.
C	Development Project Approval and Verification	\$2,393,183	
C1	Public Projects (CIP)	<u>\$1,980,366</u>	
	Administration	\$133,829	Costs include: preparing and reviewing plans and specifications for stormwater BMPs, and SWPPP/WPCP review.
	Project Planning and Engineering	\$1,661,416	
	Compliance Inspection and Enforcement	\$84,988	
	BMP Implementation	\$100,132	

**Transitional Jurisdictional Runoff Management Plan
Annual Report Fiscal Year 2019-2020**

Table 1.1 – Estimated Jurisdictional Expenditures for FY 2019-20

Jurisdictional Worksheet Component			Explanation/Notes
C2	Private Projects	\$412,817	
	Permitting and Licensing	\$412,817	Reported costs are total costs which include staff time for in-house reviews and consultant fees for outsourced project SWQMP reviews.
3	CONSTRUCTION	\$6,506,974	
A	Public Projects (CIP)	\$4,271,026	Costs include: BMP compliance inspections during construction, and implementation of construction phase BMPs.
	Compliance Inspection and Enforcement	\$2,289,392	
	BMP Implementation	\$1,981,634	
B	Private Projects	<u>\$2,235,948</u>	
	Compliance Inspection and Enforcement	\$2,235,948	
4	MUNICIPAL	\$20,719,759	
A	Administration	<u>\$166,359</u>	Expenditures associated with the administrative oversight of the stormwater programs, regulatory reporting, and program assessment of municipal facilities by the Watershed Protection Program.
B	Streets, Roads, and Highways Element	<u>\$4,900,391</u>	
	Administration	\$445,490	Funded road operations activities include: culvert inspections and cleaning; culvert waste disposal costs, street sweeping, installation and maintenance of BMPs and road structures, and the placement of additional controls.
	Maintenance Inspections	\$4,347,983	
	BMP Implementation	\$106,918	

**Transitional Jurisdictional Runoff Management Plan
Annual Report Fiscal Year 2019-2020**

Table 1.1 – Estimated Jurisdictional Expenditures for FY 2019-20

Jurisdictional Worksheet Component			Explanation/Notes
	Other	\$0	
C	MS4 Element	<u>\$2,914,689</u>	
	Administration	\$999,689	Costs include district operations by DPW Flood Control and the Watershed Protection Program.
	Maintenance Inspections	\$1,680,000	
	BMP Implementation	\$120,000	
	Other	\$115,000	
D	Solid Waste Facilities Element	<u>\$420,641</u>	
	Administration	\$15,382	Costs include Regional Board stormwater permit fees, consultant costs associated with stormwater upgrade and repair projects, and office staff time.
	Maintenance Inspections	\$11,110	Costs include staff time to perform site inspections.
	BMP Implementation	\$28,745	Costs include stormwater consultant site inspections, sampling/testing and BMP materials.
	Other (construction)	\$365,404	Drainage improvement projects and BMP site maintenance projects.
E	Wastewater Facilities Element	<u>\$9,066,100</u>	
	Administration	\$10,000	This includes costs associated with JRMP report, the sanitary sewer system and facilities including: pump stations, sewage treatment plants and Spring Valley Operations facility. Also includes the cost of BMP design, acquisition, maintenance and monitoring, for wastewater Capital Improvement Projects, and Major maintenance projects, and at various wastewater facilities.
	Maintenance Inspections	\$50,000	
	BMP Implementation	\$6,100	
	Other	\$9,000,000	

**Transitional Jurisdictional Runoff Management Plan
Annual Report Fiscal Year 2019-2020**

Table 1.1 – Estimated Jurisdictional Expenditures for FY 2019-20

Jurisdictional Worksheet Component			Explanation/Notes
F	Road Stations Element	<u>\$610,784</u>	
	Administration	\$55,526	This includes DPW road station operations related to Permit compliance. These figures were determined as 10% of the total costs reported by the DPW Roads Division for road-related expenditures (see Streets, Roads, and Highways above).
	Maintenance Inspections	\$460,864	
	BMP Implementation	\$94,394	
	Other	\$0	
G	Fleet Maintenance Element	<u>\$9,026</u>	
	Administration	\$1,362	This includes costs associated with operation of the County's fleet maintenance and fueling facilities.
	Maintenance Inspections	\$7,465	
	BMP Implementation	\$198	
	Other	\$0	
H	Municipal Airfields Element	<u>\$719,109</u>	
	Administration	\$0	These costs involve site inspections, annual reporting, and maintenance of BMPs at airports, including oversight of tenant operations. The BMP implementation item includes Palomar asphalt cap repairs.
	Maintenance Inspections	\$70,109	
	Compliance Inspection and Enforcement	\$7,000	
	BMP Implementation	\$611,000	
	Other (sampling and analysis)	\$31,000	
I	Parks & Recreational Facilities Element	<u>\$1,634,306</u>	
	Administration	\$293,267	Costs include pollution prevention homeless programs, inspection and maintenance tracking, FMP3 updates

**Transitional Jurisdictional Runoff Management Plan
Annual Report Fiscal Year 2019-2020**

Table 1.1 – Estimated Jurisdictional Expenditures for FY 2019-20

Jurisdictional Worksheet Component			Explanation/Notes
	BMP Implementation	\$1,230,002	
	Compliance Inspection and Enforcement	\$111,037	
	Other	\$0	
J	Office Buildings & Other Municipal Facilities Element	<u>\$210,832</u>	
	Administration	\$0	DGS conducts a variety of storm water activities including: inspections and clean-up of County-owned, occupied, and leased facilities and vacant lands; maintenance and signage of storm drain inlet inserts and trash dumpsters; placement of inlet filters; maintenance of coverage and containment improvements for on-site supplies and materials; parking lot sweeping and controlled parking lot power washing; and application of erosion and sediment control measures. These costs are exclusive of fleet maintenance and fueling operations.
	Maintenance Inspections	\$115,467	
	BMP Implementation	\$95,364	
	Other	\$0	
	Management of Pesticides, Herbicides, & Fertilizers	<u>\$67,523</u>	The Department of Agriculture, Weights and Measures' Integrated Pest Control Program (IPC) performs weed management on roadsides, in airports, flood control channels, sewage treatment plants and inactive landfills; and also structural pest control on property owned and operated by the County. The expenditures reported here reflect IPC's stormwater-related activities, including maintenance of vehicles and work areas that may be used for pesticide treatments; vegetation management at landfills to prevent erosion; and annual administrative activities for this report.
	Administration	\$981	
	Maintenance Inspections	\$66,542	
	BMP Implementation	\$0	
	Other	\$0	
5	INDUSTRIAL and COMMERCIAL	\$1,740,413	
	Administration	\$411,973	DPW and AWM conduct inspections of a variety of businesses in the unincorporated County, provide regulatory oversight of mobile businesses, and conduct follow-up and enforcement of stormwater violations.
	Compliance Inspection and Enforcement	\$999,018	

**Transitional Jurisdictional Runoff Management Plan
Annual Report Fiscal Year 2019-2020**

Table 1.1 – Estimated Jurisdictional Expenditures for FY 2019-20

Jurisdictional Worksheet Component			Explanation/Notes
	Educational Outreach	\$329,422	
	Other expenditures	\$0	
6	RESIDENTIAL	\$1,673,222	
	Administration	\$245,060	Includes complaint investigations for residential sources in the unincorporated County, and follow-up and enforcement of stormwater violations. DPW also operates a regional hotline.
	Compliance Inspection and Enforcement	\$1,068,516	
	Educational Outreach	\$359,646	Several County departments coordinate and provide outreach to the residential sector and schoolchildren in support of Permit Section D.5 requirements. Costs reported here correspond to DPW only. Funded activities include developing pollution prevention content and providing direct outreach to various target audiences within the general residential and school children target audiences.
7	IDDE	\$1,157,987	
		\$1,157,987	Costs include conducting monitoring programs, assessing scientific data, and providing technical and scientific support to IDEE investigations. These costs are exclusive of the regional monitoring program which is addressed separately under regional costs.
8	EDUCATION	\$0	Education costs are included in other sections as applicable.
9	PUBLIC PARTICIPATION	\$1,053,885	
10	SPECIAL INVESTIGATIONS	\$0	Expenditures not reported for FY 2019-20.

**Transitional Jurisdictional Runoff Management Plan
Annual Report Fiscal Year 2019-2020**

Table 1.1 – Estimated Jurisdictional Expenditures for FY 2019-20

	Jurisdictional Worksheet Component		Explanation/Notes	
11	NON-EMERGENCY FIREFIGHTING	\$0	Expenditures not reported for FY 2019-20.	

\$46,073,122

**Transitional Jurisdictional Runoff Management Plan
Annual Report Fiscal Year 2019-2020**

1.3.1.2 Watershed

Table 1.2 presents the County's estimated watershed expenditures for FY 2019-20.

Table 1.2 – Estimated Watershed Expenditures for FY 2019-20

	Santa Margarita WMA	San Luis Rey WMA	Carlsbad WMA	San Dieguito WMA	Peñasquitos WMA	San Diego River WMA	San Diego Bay WMA	Tijuana WMA
Administration	\$160,619	\$229,249	\$151,584	\$146,209	\$65,168	\$361,101	\$155,589	\$230,631
Cost Share Contribution	\$0	\$213,710	\$112,318	\$308,713	\$13,288	\$239,485	\$121,534	\$47,037
Watershed Activities	\$1,200,386	\$1,516,482	\$246,646	\$1,266,651	\$70,363	\$2,702,881	\$22,395	\$100,761
Other	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Estimated Watershed Costs	\$1,361,005	\$1,959,442	\$510,548	\$1,721,574	\$148,819	\$3,303,467	\$299,518	\$378,429

**Transitional Jurisdictional Runoff Management Plan
Annual Report Fiscal Year 2019-2020**

1.3.1.3 Regional

Table 1.3 presents the County’s estimated regional expenditures for FY 2019-20. This includes only those expenditures associated with the Copermittees’ adopted Regional Budget and Work Plan. Other costs associated with regional participation (meeting attendance, etc.) are included within the jurisdictional expenditures presented above.

Table 1.3 – Estimated Regional Expenditures for FY 2019-20

Regional Programs	County Costs
Administration	\$0
Cost Share Contribution	\$824,410
Regional Activities	\$0
Other	\$0
Total Estimated Regional Costs	\$824,410

**Transitional Jurisdictional Runoff Management Plan
Annual Report Fiscal Year 2019-2020**

1.3.1.4 Total Expenditures

Table 1.4 presents the County’s total estimated expenditures for FY 2019-20 (jurisdictional, watershed, and regional).

Table 1.4 – Total Estimated County Expenditures for FY 2019-20

Component / Sub-component	Estimated Expenditures
Jurisdictional	
Administration	\$10,827,700
Development Planning	\$2,393,183
Construction	\$6,506,974
Municipal	\$20,719,759
Industrial And Commercial	\$1,740,413
Residential	\$1,673,222
IDDE	\$1,157,987
Education	\$0
Public Participation	\$1,053,885
Special Investigations	\$0
Non-emergency Firefighting	\$0
<i>Jurisdictional Total</i>	\$46,073,122
Watershed	
Santa Margarita WMA	\$1,361,005
San Luis Rey WMA	\$1,959,442
Carlsbad WMA	\$510,548
San Dieguito WMA	\$1,721,574
Peñasquitos WMA	\$148,819
San Diego River WMA	\$3,303,467
San Diego Bay WMA	\$299,518
Tijuana WMA	\$378,429
<i>Watershed Total</i>	\$9,682,801
Regional	\$824,410

Total Estimated County Costs

\$56,580,333

**Transitional Jurisdictional Runoff Management Plan
Annual Report Fiscal Year 2019-2020**

1.3.2 Funding Source

Table 1.5 shows the major sources of funding for the County’s urban runoff management programs in FY 2019-20, and describes the legal restrictions applicable to the use of each.

Table 1.5 – Legal Restrictions on the Use of Program Funding

Funding Source	Legal Restrictions
General Fund	There are no restrictions on the use of general fund for County water quality programs and activities except that they must be used only for the purposes for which they are budgeted and allocated by the County Board of Supervisors.
Flood Control District Fees	Revenue generated from these fees must be expended for activities related to flood and storm management.
Developer Deposits / Permit Fees	Deposits / fees may be used only to fund activities related to the work for which the permits are issued.
Gas Tax	Gas Tax is collected by the state and allocated to local government for transportation-related work including maintenance of existing transportation systems and construction of new transportation facilities. These funds may not be used for other purposes.
Sanitary District Fees	Sanitary District Fees are used for work related to the maintenance of sewer lines, pump stations, force mains, and several treatment plants that serve the unincorporated areas. They may be used only for such maintenance-related purposes within the respective sewer district for which they are collected.
Other Funding Sources	Other funding sources collectively account for a relatively small portion of ongoing expenditures. However, all funding for the County’s stormwater compliance programs is expended within applicable legal restrictions and limitations.

1.4. Conclusions and Recommendations

The figures presented here are an estimate of the expenditures that the County incurred to meet its compliance obligations for FY 2019-20. For the reasons explained above, they should be considered only best estimates of stormwater-related expenditures.

7.2 STRATEGIES

The County of San Diego’s strategies include jurisdictional (JRMP), optional jurisdictional, and optional WMA strategies (Tables A2-41, A2-42, and A2-43, respectively). Jurisdictional strategies are implemented in accordance with JRMP requirements in Permit Provisions E.2 through E.7. Optional jurisdictional and optional WMA strategies are additional strategies implemented in accordance with Permit Provisions B.3.b(1)(a)(i)-(vi). Some optional strategies are implemented only when certain trigger criteria have been met. Those criteria and whether they have been triggered are noted where applicable in the tables of optional jurisdictional and WMA strategies below. Optional WMA strategies are distinct from optional jurisdictional strategies in that WMA strategies may be implemented by multiple agencies. Table A2-40 contains strategy highlights for strategies implemented in the SMR WMA to provide more detail on the County’s efforts to meet Permit requirements and to reduce nutrients and other pollutants in runoff.

Table A2-40. County of San Diego Strategy Highlights




Strategy Highlight	Water Quality Benefits	Strategy Number	Bacteria	Nutrients	Metals	Trash	Sediment	Flow	Habitat/Wildlife
 <p>Collaboration with Water Districts in Lower SMR Subwatershed. There are three water districts in the Lower SMR Subwatershed. They include Camp Pendleton, Fallbrook Public Utility, and Rainbow Water District. Water districts serving more than 3,000 acre-feet of water per year are required to report water loss rates to the State Department of Water Resources annually. The gallons lost to the watershed per day due to permitted flows, leaks, breaks, and overflows can be assumed to be either moving through the watershed as surface or subsurface flows. However, water district service areas cross watershed and jurisdictional boundaries, therefore volumes lost to any particular watershed or jurisdiction are challenging to estimate. The County recommends the Regional Water Board coordinate with the water districts to review the reporting requirements under General Order 2014-0194-DWQ to explore the viability of reporting detailed data losses in each MS4 by watershed.</p>	<ul style="list-style-type: none"> Reducing non-stormwater discharges from potable sources 	2	X					X	
 <p>Development of a Green Streets Master Plan. The County is developing a Green Streets Master Plan to identify multi-benefit opportunities within unincorporated village and adjacent semi-rural residential areas to support progress on achieving water quality. The plan is currently in the early stages of development and is estimated to be completed during the first half of 2022. Key components of the Master Plan include:</p> <ul style="list-style-type: none"> Identification of candidate sites within the County Right-of-way Assessment of best-suited BMP site designs utilizing our Green Infrastructure Guidelines and design criteria Assessment of benefits provided by candidate sites Development of a project prioritization approach Develop an Estimate of Capital and Operation and Maintenance costs (30-year lifecycle) Present prioritized project recommendations and layout the broader vision for green streets in unincorporated County 	<ul style="list-style-type: none"> Will treat wet weather flows for nutrients and other pollutants 	Opt-8	X	X	X	X	X		
 <p>Inspection + Compliance Success: Illegal Discharge Elimination. Non-stormwater discharges from a farm in the Lower SMR Subwatershed were investigated in August 2019 by County staff. Multiple WPO violations, such as uncovered material storage, vehicle maintenance performed over bare ground, lack of spill kits, and trash and human feces discharged to creek bed, were discussed with the manager of the farm. Corrective actions were implemented by the farm.</p>	<ul style="list-style-type: none"> Addressing agriculture, gardening, and landscaping nutrient sources 	2, 63	X	X	X	X			X

Table A2-40. County of San Diego Strategy Highlights

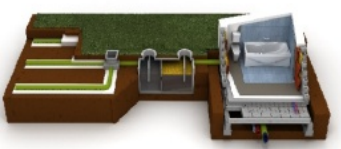
	Strategy Highlight	Water Quality Benefits	Strategy Number	Bacteria	Nutrients	Metals	Trash	Sediment	Flow	Habitat/Wildlife
	<p>Stormwater Training Video. Since FY 2014-2015, the Department of Human Resources assigns all new regular County employees the "Preventing Stormwater Pollution" video training at time of hire. In FY 2019-2020, 1,424 new employees completed the training.</p>	<ul style="list-style-type: none"> • Educating all staff on preventing stormwater pollution 	3	X	X	X	X	X	X	
	<p>Homeless Outreach Team. The County established the Homeless Outreach Team (HOT) to provide assistance and support to people experiencing homelessness. County departments and NGOs partner to offer services to unhoused individuals, remove trash associated with encampments, and remove bio-hazardous materials.</p>	<ul style="list-style-type: none"> • Addressing human sources of bacteria and trash 	7	X	X	X	X		X	
	<p>Homeless Encampment Area Cleanups. The County conducts many cleanups of focus areas to address discharges from homeless encampments. Within the SMR WMA, 0.855 tons of solid waste, 0.058 tons of universal waste, and 11 gallons of hazardous waste were collected.</p>	<ul style="list-style-type: none"> • Collected 0.855 tons of solid waste, 0.058 tons of universal waste, and 11 gallons of hazardous waste 	7, 55	X		X	X		X	
	<p>Septic System Maintenance Support. The County prepared a fact sheet on preventative septic system maintenance that was sent to 189 septic system professionals and septic tank pumpers. These fact sheets are designed to be shared with homeowners financially impacted by COVID-19 that may be experiencing septic system problems.</p>	<ul style="list-style-type: none"> • Assisting septic system owners with maintenance activities 	9, 11	X	X			X	X	
	<p>Fire Authority Facility Pollution Prevention Plans (F3Ps). County staff engaged with 16 fire stations in their jurisdiction to provide education on stormwater BMPs and collect information to prepare F3Ps. Final, facility specific, F3Ps were distributed to the stations and include guidelines for self-inspections as well as BMP implementation and maintenance.</p>	<ul style="list-style-type: none"> • Preparing pollution prevention plans for all fire stations 	15	X	X	X	X	X	X	

Table A2-40. County of San Diego Strategy Highlights

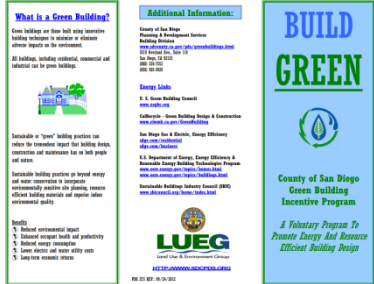




Strategy Highlight	Water Quality Benefits	Strategy Number	Bacteria	Nutrients	Metals	Trash	Sediment	Flow	Habitat/Wildlife
	<p>Green Building Incentive. This program encourages green development by offering reduced plan check time and permit fees. Conservation measures include building with recycled content, straw bale construction, greywater systems, and energy use below California Energy Commission standards.</p>	<p>22</p>	<p>X</p>	<p>X</p>			<p>X</p>	<p>X</p>	
	<p>Green Building Code. The County has adopted the California Green Building Standards Code, the purpose of which is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative or even positive environmental impact. It encourages sustainable construction practices through planning/design, energy efficiency, water efficiency/conservation, material conservation/resource efficiency, and environmental quality.</p>	<p>22</p>	<p>X</p>	<p>X</p>			<p>X</p>	<p>X</p>	
	<p>San Diego County Fair Outreach. County staff provided information on how to properly handle, store and dispose of solid waste, food grease and oil, liquid waste, and sanitary waste to 126 food and exhibit vendors. Staff also conducted inspections to verify water connections for potable and wastewater at the Fairgrounds. An issue at one hose connection was identified and corrected immediately.</p>	<p>32, 38</p>	<p>X</p>	<p>X</p>	<p>X</p>	<p>X</p>	<p>X</p>	<p>X</p>	<p>X</p>
	<p>December Nights Event Outreach. County staff provided outreach and education on how to properly handle, store and dispose of solid waste, food grease and oil, liquid waste, and sanitary waste to 135 food vendors. Staff also conducted inspections to verify wastewater, garbage, and refuse are properly disposed.</p>	<p>32, 38</p>	<p>X</p>	<p>X</p>	<p>X</p>	<p>X</p>	<p>X</p>	<p>X</p>	<p>X</p>
	<p>Poo Points Program. The CASQA award-winning Poo Points program is a youth-driven outreach effort aimed at promoting proper management of pet waste by large property owners in the unincorporated areas of the County of San Diego. During fiscal year 2019-2020, 2 Poo Points presentations were conducted that reached 47 youth and 29 adults.</p>	<p>33; 50</p>	<p>X</p>	<p>X</p>		<p>X</p>			

Table A2-40. County of San Diego Strategy Highlights




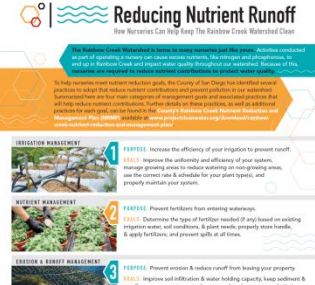

Strategy Highlight	Water Quality Benefits	Strategy Number	Bacteria	Nutrients	Metals	Trash	Sediment	Flow	Habitat/Wildlife
 <p>Pet Waste Outreach. During fiscal year 2019-2020, The County partnered with I Love A Clean San Diego to attend 37 community events. During the community events, 129 pet waste surveys were completed and 124 participants filled out commitments to pick-up their pet waste at least weekly. Additionally, Pet Waste outreach and education material was received by 15 businesses with 300 English pet waste flyers and 150 Spanish pet waste flyers delivered during the fiscal year.</p>	<ul style="list-style-type: none"> Educating residents on reducing sources of bacteria and nutrients 	33; 50	X	X					
 <p>Pesticide Container Recycling Events. The County partnered with EDCO Waste Disposal to host two free pesticide container recycling events, which provided commercial pesticide users opportunities to legally recycle their used pesticide containers. More than 2,500 pounds of containers were recycled and were later repurposed by the Agricultural Container Recycling Council into many useful products.</p>	<ul style="list-style-type: none"> More than 2,500 pounds of pesticide containers were recycled 	36	X	X	X		X	X	X
 <p>Promoting Water Conservations and Rain Capture: Rain Barrels. The County held three rain barrel distribution events in FY 2019-2020: Fallbrook (October 2019), Ramona (February 2020), and Spring Valley (February 2020). A total of 510 rain barrels were distributed to unincorporated residents.</p>	<ul style="list-style-type: none"> A total of 510 rain barrels were distributed 	45; Opt-2	X					X	
 <p>Rainbow Creek Flyers for Commercial Nurseries. The County designed Rainbow Creek Nutrient Reduction and Management Plan (NRMP) flyers to convey Best Management Practice (BMP) information to growers in the Rainbow Valley. Four main categories of BMPs were highlighted (Irrigation Management, Erosion and Runoff Management, Nutrient Management, and Training and Record Keeping) to help nurseries reduce nutrient contributions to Rainbow Creek. The flyers were also translated into Spanish</p>	<ul style="list-style-type: none"> Educating agricultural growers on water quality 	47	X			X	X	X	X
 <p>Erosion and Sediment BMPs Flyer. This flyer was designed to help County residents prevent erosion and sediment transport from their properties during construction activities that disturb or expose soil. The flyer was also translated into Spanish.</p>	<ul style="list-style-type: none"> Educating construction facilities on erosion control 	47					X		

Table A2-40. County of San Diego Strategy Highlights



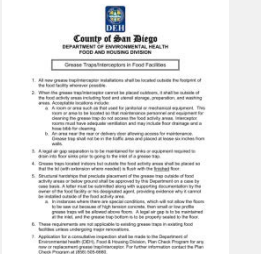
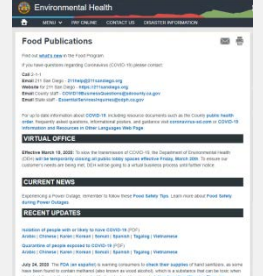

Strategy Highlight	Water Quality Benefits	Strategy Number	Bacteria	Nutrients	Metals	Trash	Sediment	Flow	Habitat/Wildlife
 <p>Do I Need A Construction Permit? Flyer. This flyer was developed to help County residents identify some of the more common permits required for construction activities within the County of San Diego as well as the appropriate contact agencies and resources.</p>	<ul style="list-style-type: none"> Educating construction facilities on permit requirements 	47			X	X	X	X	
 <p>Zero Waste Symposium Attendance. County staff attended the Zero Waste Symposium in February 2020. Attendance enables staff to remain current on legislative updates, policies, and trends in limiting waste through composting and food donation. Presentations cover topics such as bans of single-use products, zero waste at large venues, recycling in California, and defining recycling markets.</p>	<ul style="list-style-type: none"> Learning additional ways to reduce trash 	47	X	X	X	X	X	X	X
 <p>Grease Traps/Interceptors in Food Facilities Handout. The County developed a handout to educate food service establishments on preventing prohibited discharges of food grease and oils for food establishments. The handout is distributed to applicants applying for a new food establishment or remodeling of an existing food establishment.</p>	<ul style="list-style-type: none"> Educating food service establishments on best management practices 	47	X	X	X	X	X	X	X
 <p>Food Publication Website. The County's Food Publication Website has many resources for residents and food service establishments. Publications cover such topics as guidance on responding to a sewage backup, information on grease trap/interceptor maintenance, and irrigation guidance for community gardens.</p>	<ul style="list-style-type: none"> Educating members of the public on wastewater management 	47	X	X	X	X	X	X	X
 <p>Special Events Flyer Distribution. The County issues a Special Events Flyer on BMPs to new event organizers inquiring and applying for a Community Events Permit (CEP), when issuing a CEP and to other County Departments when they get involved in the CEP process.</p>	<ul style="list-style-type: none"> Educating Special Events organizers on best management practices 	47	X	X	X	X	X	X	X

Table A2-40. County of San Diego Strategy Highlights

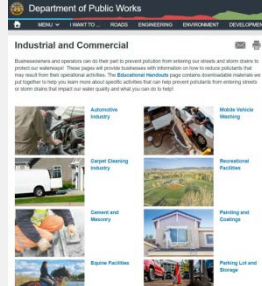
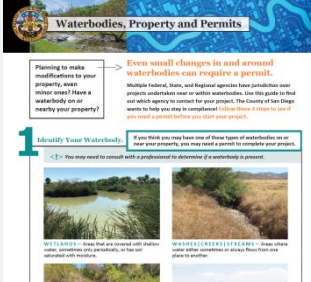
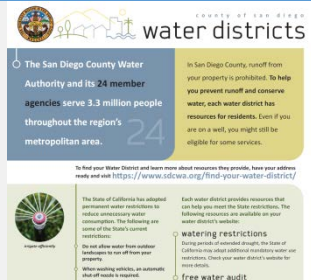


Strategy Highlight	Water Quality Benefits	Strategy Number	Bacteria	Nutrients	Metals	Trash	Sediment	Flow	Habitat/Wildlife
	<p>Revamping the DPW-WPP Industrial, Commercial, and Residential web pages. In FY 2019-2020, the County streamlined their webpage content to make materials, which include flyers and informational guides, more accessible to residents. The new layout contains more visual cues and options to enable easier navigation.</p>	<ul style="list-style-type: none"> Educating business owners on water quality protection 	47	X	X	X	X	X	X
	<p>Waterbodies, Properties and Permits Flyer. This flyer was developed to help County residents contact federal, state, and regional agencies that have jurisdiction over projects near or within waterbodies. The flyer was also translated into Spanish.</p>	<ul style="list-style-type: none"> Educating residents on water quality protection 	47	X				X	
	<p>Water Districts and Restrictions Flyer. A flyer was created to help County residents prevent runoff and conserve water by guiding them to resources water agencies provide in the County's jurisdiction. This flyer was also translated into Spanish.</p>	<ul style="list-style-type: none"> Educating residents on water quality protection 	47	X				X	
 <p>Training Video: Inspecting Your Business Employees for Stormwater Awareness (E</p>	<p>Inspect Your Business and Train Your Employees Training Videos. The County created a video in English and Spanish to help industrial and commercial facilities meet their annual stormwater training requirement. The video included an inspection checklist that facilities can use to inspect their business as well as a checklist to train their employees. These videos were posted to the County's DPW-WPP website.</p>	<ul style="list-style-type: none"> Educating business owners on water quality protection 	47	X	X	X	X	X	X
	<p>Watershed Flyer Development. Nine Watershed Specific Flyers were developed that highlight the unique characteristics of each of the watersheds that the County of San Diego has an active presence in through inspections, sampling, complaint investigations, etc. The flyers include a map of the watershed with landmarks for orientation on the first page, and on the second page there is a focus on how residents can help reduce the top priority pollutants in their respective watersheds.</p>	<ul style="list-style-type: none"> Educating residents on water quality protection 	47	X	X	X	X	X	X

Table A2-40. County of San Diego Strategy Highlights







Strategy Highlight	Water Quality Benefits	Strategy Number	Bacteria	Nutrients	Metals	Trash	Sediment	Flow	Habitat/Wildlife
	<p>Commercial Food Waste Prevention and Source Reduction Guide. The County's commercial food waste prevention and source reduction guide and checklist continued to be distributed in FY 2019-2020. This guide focuses on increasing the amount of food recovered for consumption and waste diversion. Staff also present this information to schools and businesses.</p>	<p>47, 48</p>		X	X	X	X		X
	<p>Water Wise Farming. A collaboration between UCCE and County staff created an informational sign "Water Wise Farming", which was displayed for two weeks at the Carlsbad Flower Fields in March 2020. The display provides demonstrations of BMPs for water quality and run-off, as well as self-assessment materials. An estimated 6,000 growers and members of the public viewed the display.</p>	<p>47, 54</p>	X	X	X		X	X	X
	<p>"Down To Earth" Programming. The County created 24-minute video featuring home gardening tips, which focused on educating viewers on water conservation. A total of 211 airings on local programming occurred during FY 2019-2020.</p>	<p>47, 54</p>		X			X	X	X
	<p>Master Gardener Website. During the COVID-19 pandemic, the Master Gardeners developed a new feature for the website that addressed public need for information and activities while following the COVID-19 Stay-at-Home directive. This feature received 4,800 visits on the home page and a total of 12,870 visits to the individual sections.</p>	<p>47, 56, 57</p>	X	X			X	X	
	<p>Stormwater Community Outreach. The County conducts stormwater outreach events throughout its jurisdiction, which include school outreach on recycling and webinars for small residential agriculture. Within Santa Margarita River watershed, 16,559 people attended the events where outreach was being offered in FY 2019-2020.</p>	<p>48</p>			X	X			X
	<p>Solana Center Compost and Manure Outreach. The County partners with the Solana Center for Environmental Innovation to educate residents on composting and gardening. In FY 2019-2020 14 composting workshops were attended by 338 residents; 45 school presentations reached 5,970 students; 1 Master Composter Course had 35 weekly attendees; 10 community events reached 3,775 residents; 2 landscaper-focused one-day courses reached 36 landscapers, 5 manure management workshops reached 66 horse owners; 3 manure</p>	<p>49, 56</p>		X	X	X	X		X

Table A2-40. County of San Diego Strategy Highlights

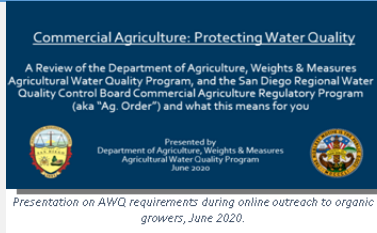
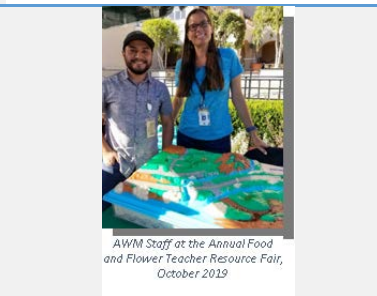


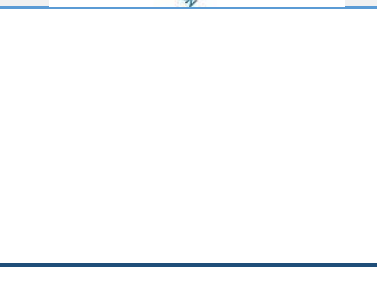
Strategy Highlight	Water Quality Benefits	Strategy Number	Bacteria	Nutrients	Metals	Trash	Sediment	Flow	Habitat/Wildlife
 <p>management community events reached 2,000 horse and livestock owners, and e-Blasts were sent to 105,742 people.</p>									
 <p>Water Quality Workshops for Commercial Agriculture Facilities. Three workshops were hosted by the County in FY 2019-2020. Two in-person outreach events were for new and prospective industrial hemp growers. The third event was an online webinar for organic growers. In total, more than 70 stakeholders attended these workshops.</p>	<ul style="list-style-type: none"> Educating agricultural growers on water quality 	54, 56	X	X	X		X	X	X
 <p>Annual Food and Flower Teacher Resource Fair. County staff attended the Annual Food and Flower Teacher Resource Fair where they discussed environmentally friendly agricultural practices and provided resources to incorporate agriculture in school curriculum to local teachers. The County booth featured an interactive model depicting best management practices employed by agricultural operations to prevent pollution to local streams and waterways.</p>	<ul style="list-style-type: none"> Educating local teachers on best management practices 	54, 56	X	X	X		X	X	X
 <p>Annual Farm and Nursery Expo. County staff hosted a booth at the annual San Diego County's Farm Bureau's Annual Farm and Nursery Expo. Staff shared information and resources regarding pollution prevention with growers in attendance.</p>	<ul style="list-style-type: none"> Educating agricultural growers on pollution prevention 	54, 56	X	X	X		X	X	X
 <p>Master Gardener Events. Master Gardeners participated in 79 events around the County with County support. At the events individuals provided information about least-toxic pest management methods, reducing runoff, and other related issues. An estimated 6,000 individuals were reached.</p>	<ul style="list-style-type: none"> Educating members of the public on best management practices 	54, 56, 57	X	X			X	X	

Table A2-40. County of San Diego Strategy Highlights

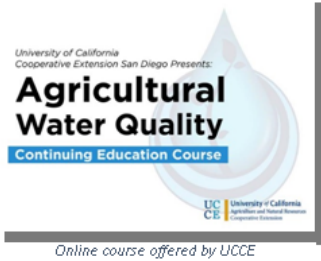
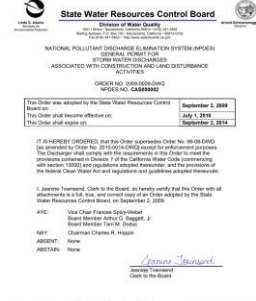
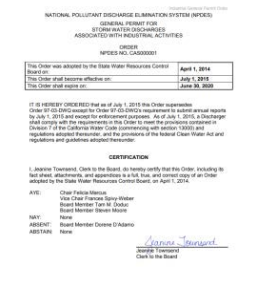
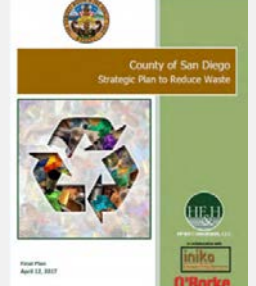
Strategy Highlight	Water Quality Benefits	Strategy Number	Bacteria	Nutrients	Metals	Trash	Sediment	Flow	Habitat/Wildlife
	<p>Agricultural Water Quality Workshops. The County and University of California Cooperative Extension (UCCE) held three workshops in FY 2019-2020 to address the requirements of the General Orders for commercial agriculture water quality and waste discharge. A total of 115 local growers attended the workshop. UCCE, sponsored by the County, also offered an online Agricultural Water Quality Continuing Education Course, which was completed by 140 participants.</p>	<ul style="list-style-type: none"> Educating agricultural growers on water quality 	54, 56, 68	X	X	X	X	X	X
	<p>Identifying State Permit Non-Compliance: CGP Referrals. The Construction General Permit (CGP) is a permit administered and enforced by the State of California. However, the County of San Diego collaborates with the State and San Diego Regional Water Board by referring CGP permit "non-filers" when they are discovered. The County's approach to referring non-filers ensures that the businesses are educated about State permit requirements and also promotes compliance with the County's WPO. In FY 2019-2020, a total of 11 CGP non-filers were reported County-wide.</p>	<ul style="list-style-type: none"> Identifying construction facilities not compliant with State Permit 	60	X	X	X	X	X	X
	<p>Identifying State Permit Non-Compliance: IGP Referrals. The Industrial General Permit (IGP) is a permit administered and enforced by the State of California. However, the County of San Diego collaborates with the State and San Diego Regional Water Board by referring IGP permit "non-filers" when they are discovered. The County's approach to referring non-filers ensures that the businesses are educated about State permit requirements and also promotes compliance with the County's WPO. In FY 2019-2020, a total of 17 IGP non-filers were reported County-wide.</p>	<ul style="list-style-type: none"> Identifying industrial facilities not compliant with State Permit 	61	X	X	X	X	X	X
	<p>Strategic Plan to Reduce Waste. County staff continued to make progress on the implementation of the Strategic Plan to Reduce Waste in FY 2019-2020. Work began on an Internal Operations Waste Diversion Phased Implementation Plan, which will provide information on enhanced Environmentally Preferable Purchase Program practices, baseline waste generation data, guidance for incorporating source reduction and recycling practices, and a recycling training plan.</p>	<ul style="list-style-type: none"> Addressing human sources of trash 	62	X	X	X	X	X	X

Table A2-40. County of San Diego Strategy Highlights






	Strategy Highlight	Water Quality Benefits	Strategy Number	Bacteria	Nutrients	Metals	Trash	Sediment	Flow	Habitat/Wildlife
	<p>Waste Reduction Assistance. The County continues to offer waste reduction assistance to commercial businesses and multifamily complexes in order to reduce instances of trash ending up in waterbodies. Efforts included direct telephone outreach to 918 non-compliant accounts, 809 site visits, 40 educational presentations to community groups, and 26,843 bi-annual recycling notices. In addition, County staff completed 378 and 157 inspections at commercial and multifamily facilities respectively; and implemented 544 and 341 recycling programs at commercial and multifamily facilities respectively. In total, 3,403 recycling containers were distributed.</p>	<ul style="list-style-type: none"> Addressing human sources of trash 	62		X	X	X	X		X
	<p>Human Bacteria (HF183) Source Abatement Actions. The County worked closely with Caltrans to identify possible human bacteria (HF183) sources at a major outfall within the Rainbow Creek Subwatershed. Source investigations led to the discovery of human feces in the channel across the I-15 that drains to the outfall and appeared to be attributed to the area being used as a roadside restroom by motorists and truck drivers. The County coordinated with Caltrans to assist with abatement of the source. Caltrans cleaned the storm drain leading to the outfall and removed brush in the area to deter motorists from stopping in the area. The County initiated a special study in response to HF183 detections at the outfall which included continuous flow monitoring with a camera at the outfall, additional source investigations, geochemistry analysis and weekly HF183 sampling. HF183 was not detected in samples after completion of abatement activities.</p>	<ul style="list-style-type: none"> Identifying and eliminating source of HF183 to reduce human sources of bacteria 	63		X	X			X	
	<p>Discovering and Referring of Agricultural Order Non-filers. Agricultural Orders (Ag. Order) are permits administered and enforced by the State of California. However, the County collaborates with the State and San Diego Regional Water Board by referring Ag. Order "non-filers" when they are discovered. The County's approach to referring non-filers ensures that the businesses are educated about State permit requirements and also promotes compliance with the County's WPO. In FY 2019-2020, a total of 32 Ag. Order non-filers were reported County-wide.</p>	<ul style="list-style-type: none"> Identifying agricultural facilities not compliant with State Permits 	63		X	X	X	X	X	X
	<p>RV Dump Station Inspections and Outreach. The County visited commercial dump stations in its jurisdiction to perform WPO compliance inspections and evaluate dump station conditions. It was found that private dump stations are moderately- to very well-kept and that RV users generally use them properly. Additionally, outreach materials (a flyer and an outside sign) were developed to provide dump station BMP reminders and links to additional WPP RV resources, including a map of commercial RV dump stations within the County.</p>	<ul style="list-style-type: none"> Educating RV owners on dump practices 	63		X	X				
	<p>Rainbow Valley Water Quality Project. The County has designed a water quality project in Rainbow Valley that includes full capture trash devices.</p>	<ul style="list-style-type: none"> Reducing trash in Rainbow Valley 	Opt-9				X			

Table A2-40. County of San Diego Strategy Highlights

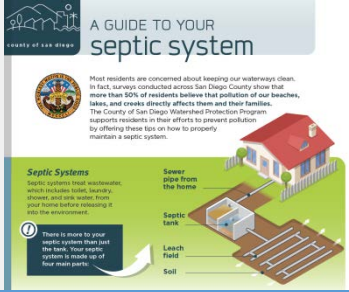

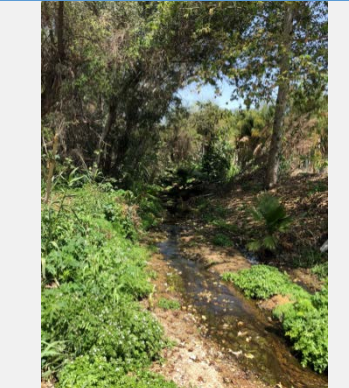
Strategy Highlight	Water Quality Benefits	Strategy Number	Bacteria	Nutrients	Metals	Trash	Sediment	Flow	Habitat/Wildlife
 <p>Septic System Outreach. The County developed both a flyer and a training video to communicate proper septic system maintenance guidelines. These materials are part of the County's approach to reaching septic system users, which will also include a rebate program in the future.</p>	<ul style="list-style-type: none"> Educating septic system owners on maintenance activities 	Opt-3	X	X				X	
 <p>Fallbrook Burn Site Maintenance. Debris from the Fallbrook Burn Site, which ceased operation in 1959, was becoming exposed by erosion. Repair and remediation of the drainage area was conducted to eliminate further erosion and the chance for the debris to enter local waterways.</p>	<ul style="list-style-type: none"> Maintaining burn site to reduce sediment discharge and erosion 	N/A	X	X	X	X	X		X
 <p>Rainbow Creek Water Quality Improvement Project. This project has completed the 30% design and is scheduled to go to the County Board of Supervisors in 2021. Survey and geotechnical work (potholing) has been completed. An initial JD determination was completed and will support the environmental review that will occur in FY 20-21. Once the environmental review begins, the County will engage with resource agencies to start discussions regarding required permits. Tribal Consultation will be completed in FY 20-21. Project design will be completed in FY 20-21 and work will begin on utility relocation and acquisition of easements. Total project cost (soft costs and construction costs) are \$11.4 M. Additional project details are provided in Section 2.3.3.1.2.</p>	<ul style="list-style-type: none"> Treat flows from approximately 324.6 acres 	Opt-8, Opt-9	X	X	X				X

Table A2-41. County of San Diego Jurisdictional Strategies

Jurisdictional Runoff Management Program (JRMP) Strategies		Implemented in FY19-20? (No/Partially/Fully)	Comments on Implementation	Proposed Modifications? (Y/N)	Modification Type & Rationale (if none, N/A)	Planned Implementation into next FY? (Y/N)
Illicit Discharge, Detection, and Elimination (IDDE) Program						
1	Maintain storm water conveyance system map to facilitate IDDE program.	Fully	Continued to maintain and enhance stormwater conveyance map to facilitate the County's Illicit Discharge Detection and Elimination (IDDE) program. Enhancements included utilizing improved GIS data to refine outfall drainage areas. Additional outfall drainage areas mapped this year.	N	N/A	Y
2	Identify and report Illicit Connections and Illegal Discharges (ICID). Includes coordination with upstream entities and monitoring outfalls for discharges from potential ICIDs.	Fully	<p>The County and its contractors continue to work to identify and address ICIDs, including the use of CCTV to identify potential discharges. All referrals from monitoring and contractors in the field with potential ICIDs are investigated. Annual IDDE investigations are conducted at all Highest Priority Persistently Flowing (HPPF) major MS4 outfalls identified in the WQIPs in an effort to identify and eliminate sources of dry weather flows in these priority drainage areas. If /when sources are identified, staff immediately conduct outreach to the responsible party when possible, or refer to the appropriate group for follow-up. The County also collects continuous flow measurements at these outfalls during the dry season, and receives real-time alarms when dry weather flows exceed the 95th percentile of mean flow. This effort assists in rapidly identifying and eliminating illicit discharges in priority drainage areas.</p> <p>The County of San Diego also adjusted some of its standard IDDE investigation and follow-up procedures to protect the health and safety of people who live and work in the County and of County employees. County staff generally limited in person interactions with responsible parties and adhered to the San Diego County Public Health Order requirements when in person interaction was necessary. While the approaches used were somewhat different than those used before the COVID-19 pandemic, the County of San Diego was still able to identify and respond to illicit discharges in compliance with the MS4 Permit, as discussed in more detail in the County's letter to the Regional Board dated March 27, 2020.</p>	Y	Editorial.	Y
3	Updated focused training for County field staff.	Fully	Updated and provided General Awareness Training, Administrator Training, and Implementers Training for County staff. Staff involved in the construction and industrial inspections receive additional training specific to their duties.	N	N/A	Y
4	Collect effluent on the ground (EOG), sanitary sewer overflow (SSO) data.	Fully	The County responded to 76 EOG complaints related to septic systems or sewer laterals and 26 were valid. The County also responded to 7 SSO events; responses may include a combination of removing obstructions, cleaning & CCTV of sewer line, adding to root abatement program, making point repairs, Smart Cover monitoring, performing a hydraulic assessment of sewer line, or removing and replacing downstream defective pipe.	N	N/A	Y
6	Facilitate public reporting by operating a bilingual hotline and online reporting tool.	Fully	Continued to operate a hotline and an online reporting tool to facilitate public reporting. The County also updated its website to highlight public reporting capabilities.	N	N/A	Y

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7	Collaborate with multiple County departments to address homelessness through cleanups, outreach, and other services.	Fully	<p>The County's Cleanup and Sanitation Program (CSP) supports and expands on County DPW's core road and drainage maintenance work by providing specialized removal and sanitization of waste and biohazardous waste associated with homeless encampments located on County maintained road right-of-way and drainages, flood control facilities, and other DPW maintained property including County airports. CSP staff coordinate with the County Health and Human Services Agency and the Sheriff's Homeless Assistance Resource Team to provide resources to affected individuals whenever possible. For interjurisdictional issues, CSP works with other County agencies including the DPR and PDS as well as outside transit agencies such as the Metropolitan Transit Services and the California Department of Transportation and other municipalities in the region. The activities of the CSP positively contribute to the County's public and environmental health.</p> <p>In FY 19-20, CSP removed 0.855 tons of solid waste, 0.058 tons of universal waste, and 11 gallons of hazardous waste.</p> <p>Additionally, County DPR established the Homeless Outreach Team to address homelessness in County parks, specifically by implementing proactive patrols to curb homeless encampments in sensitive habitats and watersheds.</p>	N	N/A	Y
9	Implement practices and procedures to address septic system failures.	Fully	<p>A septic system training video was produced by the County and its contractors that provides the public with information on how a septic system functions, what causes septic system failures and ways to identify failures, BMPs of a septic system, and why maintaining a properly functioning septic system is important to our region's water quality. The video was uploaded to DPW's Facebook page in June 2020. Also developed an outreach flyer with most of the septic system training video objectives and graphics. Suspected septic discharges are reported to County DEH during business hours and the Hazardous Incident Response Team complaint line after hours. Collaboration between code enforcement divisions takes place at biweekly compliance meetings.</p>	N	N/A	Y
10	Provide and coordinate emergency response services to sanitary sewer overflows to minimize public health and environmental impact.	Fully	<p>DEH provides emergency response, public notification, and coordination with responsible sewer agencies.</p>	N	N/A	Y
11	Implement practices and procedures to prevent infiltration of seepage from sanitary sewers.	Fully	<p>Wastewater agencies follow the Sewer System Management Plans to conduct routine maintenance and mitigate vulnerabilities. The County does not own and/or operate any wastewater collection systems in the Santa Margarita River WMA, but coordinates with wastewater agencies in the WMA as applicable.</p>	N	N/A	Y
14	Develop and implement a strategy for investigating and addressing ICIDs.	Fully	<p>Continued to improve procedures for investigating and addressing ICIDs.</p>	N	N/A	Y

Table A2-41. County of San Diego Jurisdictional Strategies

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Development Planning						
15	Require implementation of source control and Low Impact Development (LID) BMPs for all development projects.	Fully	The County BMP Design Manual requires all projects regardless of size and location to implement Source Control and Site Design BMPs. These requirements are in the Watershed Protection Ordinance and County's BMP Design Manual. Resources are available related to source control and Low Impact Development BMPs on the County WPP website under Development Resources. This year, development of new fact sheets for site design and source control BMPs were initiated and expected to be finalized in FY 20-21. This includes a new tool to support the use of significant site design BMPs for reducing design capture volume for Priority Development Projects.	N	N/A	Y
16	Priority Development Projects (PDP): In addition to requirement for all development projects, implement or require implementation of onsite structural BMPs to control pollutants and manage hydromodification for PDPs.	Fully	The County BMP Design Manual requires all projects regardless of size and location to implement Source Control and Site Design BMPs. These requirements are in the Watershed Protection Ordinance and County's BMP Design Manual. Resources are available related to source control and LID BMPs on the County WPP website under Development Resources.	N	N/A	Y
17	Update BMP Design Manual procedures to specify stormwater requirements applicable to development and redevelopment projects, identify and design appropriate BMPs, establish maintenance criteria, and establish where implemented alternative compliance options can be cited.	Fully	The County BMP Design Manual requires all projects regardless of size and location to implement Source Control and Site Design BMPs. These requirements are in the Watershed Protection Ordinance and County's BMP Design Manual. Resources are available related to source control and LID BMPs on the County WPP website under Development Resources.	N	N/A	Y
18	Conduct internal (staff) training on the updated BMP Design Manual.	Fully	Training was conducted through bi-weekly "Think Tank" meetings with development reviewers and inspectors. Staff received the Development Resources Newsletter where the release of the 2019 County BMP Design Manual was announced. The BMP Design Manual guides the implementation of private and public development projects under the MS4 Permit. Staff training was provided on sizing methods and calculations for Significant Site Design BMPs.	N	N/A	Y
19	Hold external land development <u>workshops outreach</u> targeting the development community <u>and other interested audiences</u> .	Fully	Stakeholders in the land development community received the Development Resources Newsletter where the release of the 2019 County BMP Design Manual was announced. An external workshop for North County Engineers group was conducted on May 14, 2020 for the development community on sizing methods and calculations for Significant Site Design BMPs. The County continues to lead efforts for the Regional Land Development Workgroup, including presentations that have been made on tools for the County BMP Design Manual and inspection program.	Y	Editorial to reflect implementation efforts	Y

Table A2-41. County of San Diego Jurisdictional Strategies

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20	Implement a program that ensures all structural and Low Impact Development (LID) BMPs are designed, constructed and maintained on Priority Development and Redevelopment Projects <u>for public and private projects.</u>	Fully	<p>Structural and LID BMPs were designed and constructed per the BMP DM. Structural BMPs were tracked for maintenance through inspections and self-verification letters. The LID BMPs that are installed as a result of implementation of the BMP DM are proposed to be inspected. Resources are available related to Source Control, Site Design and Structural BMPs on the County Watershed Protection Program website located under Development Resources. There is a web page dedicated to maintenance of BMPs for property owners.</p> <p>This year, a Self-Verification Determination (SVD) portal was introduced for property owners and HOAs in order to give them an online option report on their required maintenance responsibilities. The SVD portal provides the BMP location, as well as where photos and other maintenance documentation can be uploaded from a smartphone or desktop computer. In addition, the County finalized Green Street Design drawings to be utilized for PDP Exempt projects.</p> <p>The County continued efforts to streamline the public project acceptance process to ensure timely incorporation into the BMP inventory.</p>	Y	Editorial to reflect implementation efforts	Y
21	Impose legal authority to ensure all development and redevelopment projects are in compliance with all post construction requirements.	Fully	The WPO was updated in Fiscal Year 2016 to include modifications necessary as the result of the updated permit and the inclusion of applicant implemented offsite alternative compliance.	N	N/A	Y
22	Update County codes, ordinances, and stormwater design standards consistent with the permit and the updated BMP Manual.	Fully	<p>The WPO was updated in FY 15-16 to include modifications necessary as the result of the updated permit and the inclusion of applicant implement offsite alternative compliance. WPO update became effective on February 26, 2016.</p> <p>This year, updates were made to the County's Landscape Ordinance to incorporate vegetated structural BMPs, vegetated Source Control and Site Design requirements associated with Priority Development Plans into different areas of permitted Landscape and Irrigation Plans, such as 1) denoting location, type, and size of vegetated structural BMPs, or any other vegetated BMPs, that will be installed on the property to meet stormwater requirements; 2) making vegetated Structural BMPs and vegetated Source Control and Site Design BMPs part of the Special Landscape Area; and 3) requiring Structural BMPs and other vegetated Source Control and Site Design BMPs to be shown on a sign that is placed in developments with Model Homes.</p>	N	N/A	Y
Construction Management						
23	Maintain, update and prioritize a watershed-based inventory of all projects issued local permits that allow soil disturbing activities.	Fully	Projects that are issued local permits that allow soil disturbance activities are part of the inventory that is watershed-based.	N	N/A	Y
24	Require implementation of BMPs that are site specific, seasonally appropriate and appropriate to the construction phase, year-round.	Fully	Every project requires implementation of site-specific construction BMPs, seasonally appropriate and appropriate to the construction phase.	N	N/A	Y

Table A2-41. County of San Diego Jurisdictional Strategies

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25	Impose legal authority to ensure inventoried construction projects are in compliance with all requirements.	Fully	The WPO is the current legal authority to ensure inventoried construction projects are in compliance with all requirements. No new updates were necessary during the reporting period.	N	N/A	Y
26	Make updates to County ordinances related to construction; reference to existing grading ordinance.	Fully	County ordinances are updated with subsequent Construction General Permit updates; the WPO will be updated as necessary as a result of future Grading Ordinance updates.	N	N/A	Y
27	Provide internal staff training related to construction storm water management.	Fully	The County conducts construction stormwater training annually and it targets construction inspectors in Development of Public Works-Private Development Construction Inspection, Planning Development Services Group-Building, and Capital Improvement Projects Inspectors in Department of Public Works, Department of General Services, and Department of Parks and Recreation.	N	N/A	Y
Existing Development						
28	Maintain and update a watershed-based inventory of existing development (i.e. commercial, industrial, municipal and residential areas) through a consolidated database.	Fully	This year the County continued its efforts to cross-reference records of existing development and expanded its inventory by adding new facilities. An enhanced prioritization analysis was performed to more effectively manage the inventory. The new approach will be tested and implemented in FY20-21.	N	N/A	Y
31	Maintain and promote an Equestrian BMP Handbook.	Fully	An Equestrian BMP Handbook was developed and implemented in FY 14-15. The Handbook was revised in FY 17-18 to encompass additional BMPs and were released in FY 18-19. The Handbook is available on the County's updated website.	N	N/A	Y
32	Designate minimum BMPs for existing development (commercial, industrial, municipal, and residential) that are specific to the facility, area types and pollutant generating activities, as appropriate.	Fully	The JRMP and WPO establish minimum BMPs for all land use types. Inspections ensure minimum BMPs are implemented in areas of existing development. Materials were updated in English and Spanish for specific industrial, commercial, and municipal activities. This year the County developed 9 watershed specific flyers that include a map of the watershed with landmarks for orientation on the first page, and on the second page there is a focus on how residents can help reduce the top priority pollutants in their respective watersheds. An Erosion and Sediment BMP flyer was designed in English and Spanish to help County residents prevent erosion and sediment from their properties during construction activities that disturb or expose soil. The Rainbow Creek Flyers for commercial nurseries were developed in English and Spanish using community based social marketing principles to convey BMP information in four main categories (Irrigation Management, Erosion and Runoff Management, Nutrient Management, and Training and Record Keeping) to help nurseries reduce nutrient contributions to Rainbow Creek.	N	N/A	Y
33	Implement pet waste management and outreach in County parks.	Fully	Dispensers with pet waste disposal bags are installed and maintained in many County parks.	N	N/A	Y

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34	Implement a schedule of operation and maintenance activities for the stormwater conveyance system and related structures.	Fully	County Roads and Flood Control Departments maintain a schedule for operation and maintenance activities for the stormwater conveyance system and culverts. Maintenance is referred to appropriate departments as needed. This year, Roads maintained 17,737 inlets and 2,005 linear MS4, and 676 new stencils. Flood Control Maintenance Crews inspected 2,082 Storm Drain Inlets (100%), 42.3 Miles of Linear MS4 Storm Drains (75%), and 10.33 Miles of Open Channels (230%). Maintenance was performed by DPR on stormwater conveyance systems and culverts with the DPR inventory.	N	N/A	Y
35	Implement a schedule of operation and maintenance for County paved and unpaved roads.	Fully	County Roads has 3,736.05 curb miles of streets, roads, and highways that are swept based on the sweeping management schedule or as needed to prevent sediment and debris from entering the MS4. A total of 1,842.84 centerline miles of paved streets, roads, and highways are in the County Roads Maintenance system, 16,231.43 miles are swept annually. In FY19-20, High Priority Roads are 176.51 curb miles and swept twice a month or as needed for a total of 5,314.88 curb miles swept and removed 1,205.74 cubic yards (CY) of sediment, trash, and debris; Medium Priority roads are 96.38 curb miles and swept once a month or as needed of 1,654.84 curb miles and removed 610 CY of sediment, trash, and debris; Low Priority Roads are 3,463.16 curb miles and swept annually or as needed of 9,261.71 curb miles and removed 9,261 CY of sediment, trash, and debris. In FY19-20, DPW removed over 22,000 CY from County streets, roads, and highway. Maintenance was performed by DPR on roads and parking areas with the DPR inventory. Maintenance is referred to appropriate departments as needed.	N	N/A	Y
36	Require implementation of BMPs to address application, storage, and disposal of pesticides, herbicides, and fertilizers on commercial, industrial, and municipal properties. Includes education, permits, and certifications.	Fully	The County initiated the development of outreach material for golf courses, cemeteries, and wineries. Thirty-five interviews were conducted comprising of (6) golf courses, (15) wineries, (6) cemeteries, and (6) pest control businesses. Interview questions were focused on BMPs and the outreach and education materials that would best fit each business's needs. The results will be used to develop and design future outreach and education for these business industries. The County's Agriculture, Weights, and Measure's (AWM) Pesticide Regulation Program (PRP) conducted inspections, investigations, outreach and enforcement, including: - Monitored 168 field pesticide applications ensuring the pesticides were applied and stored in compliance with pesticide laws and regulations. - Conducted 160 headquarter inspections at agricultural facilities, ensuring pesticides are properly stored, labeled, and that measures to address spills and disposal are in place. - Conducted 60 inspections at agricultural facilities to ensure hazardous materials including pesticides, herbicides and fertilizers are stored properly.	N	N/A	Y

Table A2-41. County of San Diego Jurisdictional Strategies

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			<ul style="list-style-type: none"> - Monitored 149 pesticide applications to golf courses, landscapes, and agricultural commodities, in addition to 139 pesticide applications around structures. These included 62 pyrethroid applications. Pyrethroids are a class of pesticide known to be particularly harmful to water bodies because they strongly bind to sediment and other natural materials, which limits bioavailability to non-target organisms. - Issued 201 restricted material permits for the use of certain pesticides classified as restricted materials due to being hazardous to people, animals, or the environment. PRP monitored their use by conducting 64 pre-site visits to ensure the pesticide can be applied safely at the site, reviewing 1039 notices of intent before each application, and by conducting inspections when these pesticides are applied to ensure the safety of the public and the environment. - Implemented 18 outreach presentations to 939 individuals on topics such as safe and effective use of pesticides, compliance with laws and regulations, licensing, and requirements specific to pyrethroids. - Investigated 62 complaints from the public regarding potential misuse of pesticides. <p>In addition, PRP received an "effective" rating on its 2019 annual evaluation by the California Department of Pesticide Regulation.</p>			
38	Conduct inspections of inventoried existing development to ensure compliance.	Fully	<p>Inspections were conducted in municipal, industrial, commercial and residential areas.</p> <p>The County's AWM Program conducted 32 agricultural property initial inspections in FY 19-20, which is 57% of the 56 inventoried facilities. An initial inspection is a visit to a facility that is not for the purpose of following up on a previous violation, or related to a complaint. A total of 64 initial inspections were conducted (some facilities receive more than one initial inspection based on their threat to water quality) 45 were compliant = 70% compliance rate.</p>	N	N/A	Y
39	Promote and encourage implementation of designated BMPs in residential areas. Conduct focused residential inspections based on strategic assessments.	Fully	<p>Staff successfully identified and eliminated prohibited flows from a number of sources through a comprehensive inspection and public outreach program in residential neighborhoods known to have persistent dry weather flows. There were increased efforts to inspect thousands of residential areas and to educate unincorporated residents about ways to reduce outdoor water use as appropriate, and implemented escalating enforcement when necessary. Additional neighborhoods were added to the inventory.</p>	N	N/A	Y
40	Develop and implement a residential inspection tracking program via mobile platform to increase inspection efficiency.	Fully	<p>A mobile tracking application was developed in FY14-15 and continued to be used during the reporting period. The application allows inspectors to quickly access parcel GIS data to assist with routine inspections.</p>	N	N/A	Y
42	Enforce legal authority established for all inventoried existing development to achieve compliance.	Fully	<p>Watershed Protection Ordinance (WPO) provides legal authority and is cited during inspections. See JRMP for details. Staff implemented escalated enforcement procedures and issued Administrative Citation Warnings as needed to encourage compliance.</p>	N	N/A	Y

Table A2-41. County of San Diego Jurisdictional Strategies

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43	Update county ordinance related to existing development; reference to existing guidance documents.	Fully	Watershed Protection Ordinance was updated in FY15-16, see JRMP for additional details. Updates to the WPO will be made as needed.	N	N/A	Y
45	Collaborate with partner agencies and groups to promote incentive programs for BMP retrofits, including rain barrels, smart controllers, soil sensors, turf replacement, etc.	Fully	The County continued to work with regional partner agencies to promote incentive programs for BMP retrofits, including rain barrels, smart controllers, soil sensors, turf replacement, etc. Efforts continued on the development of an independent incentive program to further promote BMP implementation on private property. Additionally, the County hosted three rain barrel distribution events, including one within the Santa Margarita River WMA at the Mission Resource Conservation District. Over 500 50-gallon rain barrels were sold to unincorporated residents.	N	N/A	Y
46	Identify candidate areas of existing development for stream, channel, and/or habitat rehabilitation projects and facilitate implementation of such projects.	Fully	The County began efforts on a draft pay-for-performance contract for stream restoration. This innovative contracting solution is being explored for its potential to deliver highly impactful projects like stream restoration on private property. Work will continue on the development of a Request For Proposals which is planned for release in FY20-21.	N	N/A	Y
63	Enhanced non-stormwater flow investigations.	Fully	The County continued with its efforts to identify sources of non-stormwater flow. In addition to the residential inspections program, which seeks to identify irrigation runoff during the early morning hours, the County also did extensive outreach and enforcement during normal business hours and followed up on every identified source to ensure it was resolved.	N	N/A	Y
65	Determine approximate volume of permitted flows entering the MS4.	Fully	There are numerous water districts operating in the County of San Diego's jurisdiction. Water districts serving more than 3,000 acre-feet of water per year are required to report water loss rates to the State Department of Water Resources annually. The gallons lost to the watershed per day due to permitted flows, leaks, breaks, and overflows can be assumed to be either moving through the watershed as surface or subsurface flows. However, water district service areas cross watershed and jurisdictional boundaries, therefore volumes lost to any particular watershed or jurisdiction are challenging to estimate. The County recommends the Water Board coordinate with the water districts to review the reporting requirements under General Order 2014-0194-DWQ to explore the viability of reporting detailed data discharges and losses to each MS4 by watershed.	N	N/A	Y
72	Annually review commercial agricultural facilities in the Rainbow Creek watershed that may discharge pollutants to the County MS4 and add any newly identified facilities to the inventory.	Fully	During FY19-20, 4 additional agricultural facilities were identified by staff and added to the County Agricultural Water Quality (AWQ) inventory in the Rainbow Creek subwatershed.	Y	New: strategy added to describe current efforts more accurately	Y
73	Focus investigative efforts on identifying significant sources of nutrients within the Rainbow Creek subwatershed.	Fully	When AWM AWQ receives reports from DPW's Watershed Protection Program showing samples that exceeded nutrient standards, follow-up inspections are conducted at adjacent agricultural facilities where stormwater runoff has the potential to enter the County MS4. AWM AWQ makes these inspections a priority and coordinates efforts with DPW, if necessary and prudent, in identifying any agricultural facilities that may have contributed to these exceedances. In FY19-20, no agricultural facilities were positively identified as being contributors to any reported nutrient standard exceedance.	Y	New: strategy added to describe current efforts more accurately	Y

Table A2-41. County of San Diego Jurisdictional Strategies

Jurisdictional Runoff Management Program (JRMP) Strategies		Implemented in FY19-20? (No/Partially/Fully)	Comments on Implementation	Proposed Modifications? (Y/N)	Modification Type & Rationale (if none, N/A)	Planned Implementation into next FY? (Y/N)
74	Conduct additional inspections at agricultural facilities in response to elevated nutrient monitoring results to try and identify and eliminate pollutant sources within corresponding drainage areas.	Fully	When AWM AWQ receives reports from DPW's Watershed Protection Program showing samples that exceeded nutrient standards, follow-up inspections are conducted at adjacent agricultural facilities where stormwater runoff has the potential to enter the County MS4. AWM AWQ makes these inspections a priority and coordinates efforts with DPW, if necessary and prudent, in identifying any agricultural facilities that may have contributed to these exceedances. In FY19-20, no agricultural facilities were positively identified as being contributors to any reported nutrient standard exceedance.	Y	New: strategy added to describe current efforts more accurately	Y
75	Increase regulatory presence and achieve higher inspection frequency depending on level of compliance throughout the year in the MS4 unincorporated area by adding staff hours (i.e., 0.5 full-time supervisor to have a dedicated supervisor over the Agricultural Water Quality Program and 2 full-time inspectors).	Fully	In FY19-20, AWM added a full-time dedicated AWQ Supervisor (100% increase from FY18-19) and 3 full-time inspectors (200% increase from FY18-19).	Y	New: strategy added to describe current efforts more accurately	N (strategy completed)
76	Increase inspection frequency up to four inspections per High Threat to Water Quality existing commercial agricultural facility and depending on the facility's compliance history.	Partially	Implemented in the Rainbow Creek subwatershed, where 44 initial inspections were conducted for inventory of 36 facilities (some can have multiple initial inspections), 29 were compliant = 66% compliance rate for initial inspections. Seventeen re-inspections were conducted (some facilities needed more than 1), 10 were compliant = 59% compliance rate for re-inspections. Re-inspections on the remaining businesses not yet brought into compliance have been delayed by the COVID-19 pandemic. Overall, 61 inspections (initial + follow up) were conducted and 39 were compliant (64% compliance rate).	Y	New: strategy added to describe current efforts more accurately	Y
Public Education and Participation						
47	Develop, improve and distribute outreach and education materials.	Fully	This year watershed specific flyers were developed that highlight the unique characteristics of each of the watersheds that the County of San Diego has an active presence in through inspections, sampling, complaint investigations, etc. The flyers include a map of the watershed with landmarks for orientation on the first page, and on the second page there is a focus on how residents can help reduce the top priority pollutants in their respective watersheds. The Erosion and Sediment BMP flyer was developed to help County residents identify some of the more common permits required for construction activities within the County of San Diego as well as the appropriate contact agencies and resources. The "Waterbodies, Property and Permits" flyer was developed to help County residents contact federal, state, and regional agencies that have jurisdiction over projects that are near or within waterbodies. The County received input from the Army Corp of Engineers, US and California Fish & Wildlife, and Regional Water Quality Control Board to develop this flyer that was also translated into Spanish. The Water Agency flyer was created to help County residents prevent runoff and conserve water by guiding them to resources that the different County water agencies provide. The County received input from the San Diego County Water Authority to develop this flyer and it was also translated into Spanish. The Watershed Protection Program in collaboration with County Department of Agriculture, Weights, and Measures (AWM) designed the Rainbow Creek Nutrient Reduction and Management Plan flyers to complement the overview flyer. The flyer development used community based social marketing principles to convey BMP information in four main categories (Irrigation Management, Erosion and Runoff Management, Nutrient Management, and Training and Record Keeping) to	N	N/A	Y

Table A2-41. County of San Diego Jurisdictional Strategies

	Jurisdictional Runoff Management Program (JRMP) Strategies	Implemented in FY19-20? (No/Partially/Fully)	Comments on Implementation	Proposed Modifications? (Y/N)	Modification Type & Rationale (if none, N/A)	Planned Implementation into next FY? (Y/N)
			<p>help nurseries reduce nutrient contributions to Rainbow Creek. These flyers were translated into Spanish as well. Folders containing the following outreach and education materials were prepared and distributed to each of the 98 agricultural facilities that received initial inspections in FY 19-20: Agriculture Order flyer, AWQ flyer, Sample Storm Water Pollution Prevention Plan (SWPPP) fillable document, AWQ Program Summary Sheet, Violation FAQ sheet, Spanish and English Stormwater Training packets, National Resources Conservation Service (NRCS) program information, Mission Resource Conservation District (MRCD) program information, State Water Efficiency and Enhancement Program (SWEEP) information, and the University of California Cooperative Extension (UCCE) program information. Nutrient Runoff Management Plan (NRMP) flyers in English and Spanish were also distributed to the agricultural facilities located in the Rainbow Creek subwatershed. These materials were also distributed at complaint and follow up inspections as needed.</p> <p>The County created an "Inspect Your Business and Train Your Employees" training video in English and Spanish this year to help industrial and commercial facilities meet their annual Watershed Protection Ordinance training requirement. These videos focus on two of our industrial and commercial flyers that we developed using community based social marketing principles, an inspection checklist that facilities may use to inspect their businesses, and a checklist to train their employees. These videos are available to the public on the County's Watershed Protection Program website.</p> <p>County AWM's Agricultural Water Quality (AWQ) Division updated its public-facing website extensively to ensure it is a valuable resource for outreach and education materials, including program information, FAQs, BMPs, WQIPs, WPO, and training materials. The website is manually checked by staff monthly to ensure all links are still viable and that provided information is up to date and accurate. A presentation regarding AWQ program requirements and the Agriculture Order requirements was developed and will be shared with commercial agricultural operations and posted on AWM's website during FY 20-21.</p>			
48	Provide presentations to elementary, middle, and high school students.	Partially	Efforts continued on providing thousands of elementary, middle, and high school age students with on-site educational programs that promote water quality awareness and pollution prevention practices. Due to the COVID-19 pandemic, the school presentations transitioned to virtual presentations later in the school year.	N	N/A	Y
49	Outreach to mobile landscaping service providers.	Fully	County AWM presented on pesticide use laws and regulations at three continuing education events for licensed pesticide applicators, including maintenance gardener pest control businesses (i.e., "mobile landscaping service providers") to a total of 363 attendees. This pilot program will no longer be implemented due to a lack of state funding and currently future funding is not anticipated.	N	N/A	N

Table A2-41. County of San Diego Jurisdictional Strategies

Jurisdictional Runoff Management Program (JRMP) Strategies		Implemented in FY19-20? (No/Partially/Fully)	Comments on Implementation	Proposed Modifications? (Y/N)	Modification Type & Rationale (if none, N/A)	Planned Implementation into next FY? (Y/N)
54	Collaborate with watershed partners to develop consistent messaging to targeted audiences to conserve water and reduce dry weather flows.	Fully	<p>During FY19-20, the County reached out to all water districts with overlapping jurisdiction to offer to provide the addresses of residences where over-irrigation was observed by County field staff. County staff send monthly reports to multiple water districts summarizing over-irrigation investigation findings.</p> <p>E-mail listserv bulletins were sent out to subscribers on a monthly basis. Bulletin topics range from seasonal topics (i.e. rainy season BMPs, dry season BMPs), County COVID-19 updates, and upcoming water quality improvement events (i.e. cleanup events, rain barrel sales events, virtual workshops). A total of 39 bulletins were sent out to subscribers. Staff also used social media to try to reach an even broader audience, posting important messages about watershed events and pollution prevention throughout the year on Facebook and Twitter.</p> <p>The Regional Copermittee Education and Outreach Workgroup launched a 5-year Stormwater Behavior Change Marketing Campaign using community based social marketing principles to drive stormwater-friendly behavior changes in targeted audiences throughout San Diego County. During the initial year, an audit of all existing education and outreach materials developed in the past was conducted to determine strategies or messaging that worked. Copermittees continue to work on developing an engagement strategy, targeted audiences, media strategy, including social media, and metrics to measure and adaptively manage the campaign through Years 2-4, which will be public facing. The Workgroup also sponsored multiple public volunteer-based trash cleanup events through I Love A Clean San Diego, including Coastal Cleanup Day, Creek to Bay Cleanup, and multiple Watershed Warrior cleanups. Totals for trash removed during these events in FY19-20 are listed in Jurisdictional Strategy #55.</p>	N	N/A	Y
55	Sponsor trash collection events	Fully	<p>The County facilitated and sponsored several additional clean-up events to remove trash and debris from waterways, including: Creek to Bay Cleanup, Coastal Cleanup Day and Watershed Warrior local community events. Staff and I Love A Clean San Diego (ILACSD) coordinated trash cleanup events in conjunction with high school and middle school outreach. Due to the COVID-19 pandemic, the cleanup events were adjusted to become virtual events around participant's neighborhoods. The ILACSD trash cleanup events sponsored by the County in FY19-20 coordinated over 9,000 community volunteers resulting in the removal of 163,815.35 lbs of trash and recyclables throughout the region. The breakdown of trash and recyclables removed per event is as follows:</p> <ul style="list-style-type: none"> • Creek to Bay Cleanup – 7,038.74 lbs trash; 1,605.61 lbs recyclables (909 volunteers) • Watershed Warrior cleanups – 9,148 lbs trash; 1,023 lbs recyclables (1,136 volunteers) • Coastal Cleanup Day – 145,000 lbs trash and recyclables (>7,000 volunteers) 	N	N/A	Y

Table A2-41. County of San Diego Jurisdictional Strategies

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56	Educational Workshops on Integrated Pest Management, manure management.	Fully	Due to COVID-19, University of California Cooperative Extension (UCCE) modified Healthy Gardens Healthy Homes in-person workshops to online formats. UCCE also cancelled and or postponed all in-person Master Gardener events. To continue service to community, Master Gardeners implemented two new outreach activities. The Master Gardener Hotline (858-822-6910) was staffed remotely to continue to address non-commercial home horticulture and pest management questions and concerns. In addition, Master Gardeners headed by Master Gardener Communications Committee, developed a new feature on the Master Gardener website called "Let's Grow Together San Diego-Stay-at-Home Gardening Resources," to address the public's need for information and activities (https://www.mastergardenersd.org/). This feature is a 'one-stop-shop' for home horticulture and pest management information and activities and includes sections such as Ask a Master Gardener (MG Hotline), UC IPM Pest Notes, Youth Activities, Reminiscence Gardening, Online Workshops, Videos, Healthy Garden Healthy Home activities, Adult Coloring book activities, Beginning Vegetable Gardening instruction. This new web feature was promoted during this reporting period. Outreach on manure management was provided by The Solana Center for Environmental Innovations (Solana Center) through virtual workshops. The Solana Center continued the manure management pilot program for the Livestock and Land at San Diego Country Estates.	N	N/A	Y
57	Partner with Water Conservation Garden Programs to provide education opportunities on water use and practices for gardening.	Fully	This year saw many challenges with hosting crowds and workshop gatherings. The County and the Water Conservation Garden worked together to rapidly develop online workshop content that could continue to promote the important messages on water use practices and gardening, especially preventing over-watering.	N	N/A	Y
58	Conduct effectiveness surveys on education and outreach programs.	Fully	Continued to evaluate the effectiveness of school presentation programs to elementary, middle school, and high school audiences through administering pre- and post- survey assessments. The results of the surveys indicated that the school presentations are effective at increasing knowledge and reaching a large and diverse group of students. In March 2020, schools throughout the County closed due to the COVID-19 pandemic, resulting in fewer presentations being given during the 2019-2020 school year. Due to the COVID-19 pandemic, the school presentations transitioned from on-site to virtual presentations later in the school year.	N	N/A	Y
62	Implement a public education and participation program to promote best management practices and behaviors that reduce the discharge of pollutants in storm water.	Fully	The County completes numerous education and public participation programs for diverse target audiences. In FY 19-20, the County with Action Research, started discussion on developing a new project to create a public participation and education webpage and will be completed in FY 20-21.	N	N/A	Y
64	Update County websites with enhanced irrigation runoff prohibition and reporting.	Fully	The County completed a major overhaul of its website to content and graphics on its residential and industrial/commercial pollutant generating activity (PGA) topic pages.	N	N/A	Y
67	Notify agricultural businesses within the County unincorporated area of the requirement to enroll under the Agricultural Order.	Fully	The Department of Agriculture, Weights, and Measures (AWM) AWQ continued to notify agricultural businesses within the County unincorporated area of the requirement to enroll under the Agricultural Order. Prior to inspections, staff identified businesses that were not enrolled and provided	N	N/A	Y

Table A2-41. County of San Diego Jurisdictional Strategies

Jurisdictional Runoff Management Program (JRMP) Strategies		Implemented in FY19-20? (No/Partially/Fully)	Comments on Implementation	Proposed Modifications? (Y/N)	Modification Type & Rationale (if none, N/A)	Planned Implementation into next FY? (Y/N)
			one-on-one outreach and relevant educational materials at the time of the inspection. A total of 32 businesses were identified as non-filers and subsequently referred to the Regional Water Quality Control Board.			
68	Develop enhanced education and outreach activities and materials in collaboration with University of California Cooperative Extension (UCCE).	Fully	The Department of AWM supported the University of California Cooperative Extension (UCCE) in providing several outreach activities and materials on the subject of stormwater pollution prevention in agricultural water use. Between August and December 2019, UCCE held three Agricultural Water Quality workshops addressing the requirements of the General Orders for commercial agriculture's water quality and waste discharge. These events were attended by a total of 115 local growers. UCCE also offered an online Agricultural Water Quality Continuing Education Course covering similar material as the in-person workshops. This course was completed by 140 participants. UCCE hosted the annual "Water Wise Farming" informational display at the Carlsbad Flower Fields. For two weeks in March 2020, this display provided demonstrations of best management practices for water quality and runoff, as well as self-assessment materials. Though this display was closed prematurely due to the COVID-19 Pandemic, it was still able to reach approximately 6,000 growers and members of the public in that time. In January 2020, UCCE shared the publication "Field Irrigation Water Management in a Nutshell" on its website. This free publication issued by UC Agriculture and Natural Resources contains technical information regarding effective irrigation management and was downloaded by approximately 250 interested persons.	N	N/A	Y
70	Enhance education outreach materials and activities focused on Rainbow Creek Nutrient Reduction Management Plan goals within the Rainbow Creek subwatershed.in coordination with University of California Cooperative Extension Office.	Fully	Rainbow Creek Nutrient Reduction and Management Plan flyers were provided during initial inspections of all 36 inventoried agricultural facilities in the Rainbow Creek subwatershed. AWM collaborated with UCCE Office on several education outreach materials and activities which benefited growers throughout the San Diego region, including those in the Rainbow Creek subwatershed.	Y	New: strategy added to describe current efforts more accurately	Y
71	Provide BMP outreach documents in English and Spanish at every inspected agricultural facility in the Rainbow Creek subwatershed.	Fully	Best Management Practice outreach material in English and Spanish were provided during initial inspections of all 36 inventoried agricultural facilities in the Rainbow Creek subwatershed, and as needed during follow up and complaint inspections.	Y	New: strategy added to describe current efforts more accurately	Y
Enforcement Response Plan (ERP)						
59	Implement escalating enforcement responses to compel compliance with statutes, ordinances, permits, contracts, orders, and other requirements for IDDE, development planning, construction management, and existing development in the Enforcement Response Plan (ERP).	Fully	County continues to implement the ERP as described in the JRMP.	N	N/A	Y

Table A2-41. County of San Diego Jurisdictional Strategies

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60	Notify the SDWB by email (Nonfilers_R9@waterboards.ca.gov) within five (5) calendar days of issuing escalated enforcement to a construction site that poses a significant threat to water quality as a result of violations or other noncompliance.	Fully	County continues to notify the Regional Board of construction escalated enforcement that poses a significant threat to water quality.	N	N/A	Y
61	Notify the SDWB by email (Nonfilers_R9@waterboards.ca.gov) any persons required to obtain coverage under the statewide Industrial General Permit and Construction General Permit and failing to do so, within five (5) calendar days from the time the Copermittee become aware of the circumstances.	Fully	County continues to notify the Regional Board of any Industrial General Permit and Construction General Permit non-filers.	N	N/A	Y
69	Notify the SDWB of potential non-filers of the Agricultural Order.	Fully	County staff notifies the RWQCB by e-mail when potential non-filers of the Agricultural Order are identified. A total of 32 referrals were made to RWQCB in FY19-20.	N	N/A	Y

Table A2-42. County of San Diego Optional Jurisdictional Strategies

Optional Jurisdictional Runoff Management Program (JRMP) Strategies	Implementation Timeframe	Triggers	Resources	Triggered? (Y/N)	Implemented in FY19-20? (No/Partially/Fully)	Comments on Implementation	Proposed Modifications? (Y/N)	Modification Type & Rationale (if none, N/A)	Planned Implementation into next FY? (Y/N)	
Provision B.3.b.(1)(b)(i) - BMPs, incentives, or programs that may be implemented that are in addition to requirements of Provision B.3.b.(1)(a)										
1	Implement Sustainable Landscapes Program to encourage landscape retrofits.	FY 2016-17; Continuous until grant funding and incentives are depleted	Implementation of this strategy may be triggered if (1) it has been determined by the County of San Diego through adaptive management that implementation is necessary; and (2) all of the necessary resources have been secured. Continue implementation when the funding and incentives items are secured.	Staff resources, Grant funding, Incentive items, Partnerships.	N	No	The Sustainable Landscapes Program grant funding was exhausted at the end of FY17-18. The County continued to promote incentive programs for BMP retrofits, including rain barrels, smart controllers, soil sensors, turf replacement, via other agencies, such as San Diego County Water Authority.	N	N/A	N
2	Implement an incentive program for BMP Retrofits (Public-Private Partnerships - a County sponsored program to offer incentives for rain barrel installation, downspout disconnects from the stormwater system, etc.)	FY 2015-16 Continuous, as resources allow	Implementation of this strategy may be triggered if (1) an interim goal has not been met; and (2) it has been determined by the County of San Diego through adaptive management that implementation is necessary; and (3) pilot program success; and (4) all of the necessary resources have been secured.	Staff resources, Grant funding or alternative source, Incentive items, Partnerships.	N	Partially	The County collaborated with the San Diego County Water Authority and Metropolitan Water District of Southern California to provide rebate opportunities at County-sponsored outreach events and rain barrel sales events. The County hosted three rain barrel distribution events, including one within the Santa Margarita River WMA at the Mission Resource Conservation District. Over 500 50-gallon rain barrels were sold to unincorporated residents. Continued promoting incentive programs related to landscapes/outdoor irrigation, including: smart timers, soil moisture sensors, irrigation / sprinkler head retrofits, turf replacement and rain barrel incentives. Planning and development of County incentive program continues.	N	N/A	Y

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3 Implement a program that provides rebates or incentives for pumping septic systems, with a focus in high-risk areas adjacent to waterways (within 600 feet).	Once triggered, Pilot program 1 -2 years, as needed thereafter	Implementation of this strategy may be triggered if (1) an interim goal has not been met; and (2) it has been determined by the County of San Diego through adaptive management that implementation is necessary; and (3) pilot program success; and (4) all of the necessary resources have been secured.	Staff resources, Grant funding or alternative source, Contractor funding, Partnerships, Incentive items.	N	Partially	The County prepared a fact sheet on preventative septic system maintenance that was sent to 189 septic system professionals and septic tank pumpers. The fact sheets were designed to be shared with homeowners financially impacted by COVID-19 that may be experiencing septic system problems. The County also developed both a flyer and a training video to communicate proper septic system maintenance guidelines. These materials are part of the County's approach to reaching septic system users, which will also include a rebate program in the coming years.	Y	Editorial to remove reference to focus on high risk areas as the County plans to implement Countywide in FY 20-21.	Y
5 Implement a program for on-site wastewater treatment (septic) systems. May include mapping and risk assessment, inspection, or maintenance practices.	Once triggered, 2-3 years	Implementation of this strategy may be triggered if (1) an interim goal has not been met; and (2) it has been determined by the County of San Diego through adaptive management that implementation is necessary; and (3) septic systems have been determined to be a pollutant sources to the MS4; and (4) all of the necessary resources have been secured.	Staff resources, Grant funding or alternative source, Contractor funding, Partnerships.	Y	Fully	Under the Local Area Management Plan (LAMP) for onsite wastewater treatment systems the treatment systems with supplemental treatment are required to be permitted annually. The annual operating permit will define the monitoring and maintenance requirements as specified by the manufacturer and/or qualified professional who designed the system.	Y	New: strategy added to describe current efforts more accurately	Y
6 Divert persistent dry weather flows from storm drains to sewer.	Once triggered, 3-6 years per project	Implementation of this strategy may be triggered if (1) an interim goal has not been met; and (2) it has been determined by the County of San Diego through adaptive management that implementation is necessary; and (3) permission is granted from sewer agency; and (4) ground water or permitted discharges have been ruled out; and (5) all of the necessary resources have been secured.	Staff resources, Grant funding or alternative source, Contractor funding, Engineering design, Environmental review, Permits, Ongoing funding for operation/ maintenance.	N	No	N/A	N	N/A	N

Table A2-42. County of San Diego Optional Jurisdictional Strategies

Optional Jurisdictional Runoff Management Program (JRMP) Strategies	Implementation Timeframe	Triggers	Resources	Triggered? (Y/N)	Implemented in FY19-20? (No/Partially/Fully)	Comments on Implementation	Proposed Modifications? (Y/N)	Modification Type & Rationale (if none, N/A)	Planned Implementation into next FY? (Y/N)	
Provision B.3.b.(1)(b)(ii) – Incentives or programs that may be implemented to encourage or implement projects to retrofit areas of existing development										
8	Implement Green Street Retrofit Program.	Once triggered, 3-7 years per project; ongoing operation & maintenance thereafter	Implementation of this strategy may be triggered on a project-by-project basis if (1) a specified interim goal has not been met; and (2) it has been determined by the County of San Diego through adaptive management that implementation is necessary; and (3) pilot program success; and (4) all of the necessary resources have been secured.	Each green street retrofit project is preliminary estimated to cost an average of \$5,500,000 per linear mile of retrofit for construction. Resources include: Staff resources, Grant funding or alternative source, Contractor funding, Engineering or landscaping design, Permits, Environmental review, Right of way acquisition, Ongoing funding for operation/maintenance.	Y	Partially	The following design and implementation of Green Street Retrofit occurred within the Santa Margarita River WMA: 1) Initiation of the Rainbow Creek Water Quality Improvement Project (see additional details in Optional Strategy #9); 2) Finalization of the Green Street design drawings; 3) The County is developing a Green Streets Master Plan to identify multi-benefit opportunities within unincorporated village and adjacent semi-rural residential areas to support progress on achieving water quality. The plan is currently in the early stages of development and is estimated to be completed during the first half of 2022. Key components of the Master Plan include: <ul style="list-style-type: none"> o Identification of candidate sites within the County Right-of-way o Assessment of best-suited BMP site designs utilizing our Green Infrastructure Guidelines and design criteria o Assessment of benefits provided by candidate sites o Development of a project prioritization approach o Develop an Estimate of Capital and Operation and Maintenance costs (30-year lifecycle) o Present prioritized project recommendations and layout the broader vision for green streets in unincorporated County 4) County-wide, there are currently 14 DPW capital improvement in design phases that are utilizing the PDP exemption pathway.	N	N/A	Y

Table A2-42. County of San Diego Optional Jurisdictional Strategies

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9 Construct Treatment Control BMPs (retrofit projects)	Once triggered, 4-7 years per project; ongoing operation & maintenance thereafter	Implementation of this strategy may be triggered if (1) an interim goal has not been met; and (2) it has been determined by the County of San Diego through adaptive management that implementation is necessary; and (3) all of the necessary resources have been secured.	Staff resources, Grant funding or alternative source, Contractor funding, Engineering or landscaping design, Permits, Environmental review, Ongoing funding for operation/ maintenance.	Y	Partially	The Rainbow Creek Water Quality Improvement Project BMPs will treat runoff from 324.6 acres. This project has completed the 30% design and is scheduled to go to the Board in 2021. Survey and geotechnical work (potholing) have been completed. An initial JD determination was completed and will support the environmental review that will occur in FY 20/21. Once the environmental review is started then we will engage with the resource agencies to start discussions required permits. Tribal Consultation will be completed in FY 20/21 and long for this project as the North County tribes have expressed interest in this location. Project design will be completed in FY 20/21 and work will begin on utility relocation and acquisition of easements. Total project cost (soft costs and construction costs) is \$11.4M. Lastly, work on developing a BMP effectiveness monitoring plan will be completed in FY 20/21. See additional project details in Section 2.3.3.1.2 of this annual report. The County has also designed a water quality project in Rainbow valley that includes full capture trash devices.	Y	New: strategy added to describe current efforts more accurately	Y
Provision B.3.b.(1)(b)(iii) - Incentives or programs that may be implemented to encourage or implement projects that will rehabilitate the conditions of channels or habitats									
11 Flood Control Channel Rehabilitation Projects (e.g., removal of impervious lining in flood control channel and replacement with earthen or vegetated surface)	Once triggered, 4-7 years per project; ongoing operation & maintenance thereafter	Implementation of this strategy may be triggered if (1) an interim goal has not been met; and (2) it has been determined by the County of San Diego through adaptive management that implementation is necessary; and (4) engineering design, monitoring, and outreach plans are approved; and (5) all of the necessary resources have been secured.	Project costs vary by size and complexity. Resources include: Staff resources, Grant funding or alternative source, Contractor funding, Partnerships, Engineering design, Permits, Environmental review, Right of way acquisition (if needed), Ongoing funding for operation/ maintenance.	N	No	N/A	N	N/A	N

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Optional Jurisdictional Runoff Management Program (JRMP) Strategies	Implementation Timeframe	Triggers	Resources	Triggered? (Y/N)	Implemented in FY19-20? (No/Partially/Fully)	Comments on Implementation	Proposed Modifications? (Y/N)	Modification Type & Rationale (if none, N/A)	Planned Implementation into next FY? (Y/N)
12 Implement a program to remove invasive non-native plants (i.e. Arundo) from upstream areas rivers or tributaries.	Once triggered, 1-2 years per project	Implementation of this strategy may be triggered if (1) an interim goal has not been met; and (2) it has been determined by the County of San Diego through adaptive management that implementation is necessary; and (3) community support and partnerships established; and (4) it has been determined that invasive plants have been found to have an impact on water quality; and (5) all of the necessary resources have been secured.	Staff resources, Grant funding or alternative source, Contractor funding, Partnerships.	N	Partially	Flood Control crews remove invasive non-native plants from storm drain channels during routine maintenance. The County's Department of Parks & Recreation (DPR) prioritizes invasive non-native plant species control or removal using an Integrated Pest Management approach and the least disruptive measures for native species within County-owned/managed preserves and parks. In FY19-20, DPR controlled or removed over 320 acres of invasive plant species within the County's Multiple Species Conservation Program area. Through the Landscape Ordinance, Grading Ordinance, and stormwater compliance the County ensures that non-invasive and native- fire resistant plants are to be design as part of the landscape plan or that the mix within the hydroseed are in compliance.	Y	New: strategy added to describe current efforts more accurately	Y
13 Habitat Restoration and rehabilitation projects in County Parks	Once triggered, 4-7 years per project; ongoing operation & maintenance thereafter	Implementation of this strategy may be triggered if (1) an interim goal has not been met; and (2) it has been determined by the County of San Diego through adaptive management that implementation is necessary; and (3) all of the necessary resources have been secured.	Staff resources, Grant funding or alternative source, Contractor funding, Partnerships, Restoration / Rehabilitation Designs Approved, Environmental Permits issued, CEQA / NEPA Environmental review, Ongoing funding for maintenance and monitoring.	N	Partially	The County actively pursues grants for the restoration and rehabilitation of County-owned/managed preserves and parks. In FY19-20, County DPR continued restoration and rehabilitation efforts within County parks by planting 4,029 native or drought tolerant trees and shrubs.	Y	New: strategy added to describe current efforts more accurately	Y

Table A2-42. County of San Diego Optional Jurisdictional Strategies

Optional Jurisdictional Runoff Management Program (JRMP) Strategies	Implementation Timeframe	Triggers	Resources	Triggered? (Y/N)	Implemented in FY19-20? (No/Partially/Fully)	Comments on Implementation	Proposed Modifications? (Y/N)	Modification Type & Rationale (if none, N/A)	Planned Implementation into next FY? (Y/N)
Structural BMPs Identified in WQIPs									
27	Turf replacement in Rainbow Park	N/A	N/A	N/A	Fully	DPR performed regular maintenance on the project site to ensure longevity of the improvements including spot cleaning artificial turf as needed, keeping the field perimeter free of weeds, and annually grooming the field with a turf grooming machine to straighten the turf blades and redistribute the infill granules.	N	N/A	Y

Table A2-43. County of San Diego, Optional WMA Strategies

Number	Optional WMA Strategies	Implementation Timeframe	Triggered During Reporting Period?	Rationale for Modification to the Strategy	Comments
WMA-1	Incentive programs to reduce non-stormwater and stormwater runoff (e.g., drought tolerant landscaping, rain barrel program, turf replacement).	Implemented starting in the following fiscal year after triggered.	No	N/A	The County continued to work with regional partner agencies to promote incentive programs. Work also continued on development of an independent incentive program to further promote BMP implementation on private property. Additionally, the County hosted three rain barrel distribution events, including one within the Santa Margarita River WMA at the Mission Resource Conservation District. Over 500 50-gallon rain barrels were sold to unincorporated residents.
WMA-2	In-stream strategies, including watercourse rehabilitation to provide natural uptake of nutrients, increase shading, or modify physical factors to reduce algal growth.	Allow 2-5 years for design, permit, and construction once triggered.	No	N/A	This year, the County began work on a draft pay-for-performance contract for stream restoration. This innovative contracting solution is being explored for its potential to deliver highly impactful projects like stream restoration on private property. Work will continue on the development of an RFP which is planned for release in FY20-21.
WMA-3	Coordinate with Integrated Regional Water Management (IRWM) regional water managers to plan for and implement water quality improvement projects (retrofits, stream rehabilitation, or other projects) that will address nutrients and/or dry weather flows.	As triggered.	No, but coordination did occur; see comments.	N/A	The San Diego IRWM Program is administered by the San Diego Regional Water Management Group (RWGM), consisting of the San Diego County Water Authority, the City of San Diego, and the County of San Diego. The group meets bi-weekly to manage the daily operations of the program, as well as develop and initiate IRWM Plan implementation activities. The San Diego RWGM also provides presentations to various stakeholder groups including water supply agencies, environmental organizations, and other agencies regarding the IRWM Program locally, and throughout the state.
WMA-4	Participate in Santa Margarita River Watershed Nutrient Initiative - Stakeholder Group as a collaborative effort to reduce nutrients and dry weather flows.	Ongoing	N/A (no trigger)	N/A	The County of San Diego participated in SMRNIG meetings along with the other SMR WMA Copermittees and continued sharing monitoring data in support of assessing eutrophic conditions in the estuary. The SMRNIG met on October 2, 2019 and March 12, 2020.

7.3 MODIFICATIONS TO BMP DESIGN MANUAL

During FY19-20, the County of San Diego BMP Design Manual was updated on Page 1-12 to remove the exclusion for PDP Category (f) "New of redevelopment projects that result in the disturbance of one or more acres of land and are expected to generated pollutants post construction". The category now includes language that defines projects that are disturbing one or more acres of land as presumed to generate pollutants post-construction unless the applicant presents a design that satisfies the County that pollutants in stormwater discharges will not exceed pre-construction background levels. The County of San Diego BMP Design Manual is available online at https://www.sandiegocounty.gov/content/sdc/dpw/watersheds/DevelopmentandConstruction/BMP_Design_Manual.html.

7.4 MODIFICATIONS TO THE JRMP

The County JRMP was updated to include modifications to the AWM Agricultural Water Quality Program included as described in the FY 18-19 WQIP ARs. Minor modifications were also made to reflect the use of consultants to complete inspections, the role of drive-by inspections, and the use of surveys for educational outreach. The County's 2019 J RMP is available at: https://www.sandiegocounty.gov/content/dam/sdc/dpw/WATERSHED_PROTECTION_PROGRAM/watershedpdf/JRMP.pdf.

7.5 CORRESPONDENCE REGARDING COMPLIANCE DURING THE COVID-19 PANDEMIC

The County of San Diego sent a letter to the San Diego Water Board describing the impacts of the COVID-19 pandemic and the associated San Diego Public Health Order on its stormwater program. The County's letter and the San Diego Water Board's response are provided in this section.



County of San Diego

BRIAN ALBRIGHT
DIRECTOR

DEPARTMENT OF PUBLIC WORKS
5510 OVERLAND AVENUE, SUITE 410
SAN DIEGO, CA 92123-1237
(858) 694-2212
www.sdcountry.ca.gov/dpw/

March 27, 2020

Mr. David W. Gibson, Executive Officer
California Regional Water Quality Control Board
San Diego Region
2375 Northside Drive, Suite 100
San Diego, CA 92108-2700

Dear Mr. Gibson:

The County of San Diego (County) received Laurie Walsh's e-mail from March 20, 2020, regarding the State and Regional Water Boards' official statement on compliance with Water Board requirements during efforts to respond to the COVID-19 public health emergency. We appreciate the Water Boards' consideration of impacts caused by COVID-19 on permittees' ability to comply with the Municipal Stormwater Permit (Permit) and other Water Board directives. This letter describes COVID-19 related impacts experienced by the County to date and requests some limited regulatory relief. Thankfully, as of this writing, County staff responsible for stormwater compliance functions have not been directly affected by the virus or reassigned to perform other critical emergency duties, but most staff began working remotely starting March 18, 2020. As you know, the COVID-19 pandemic is highly dynamic and daily adjustments will be necessary as the situation evolves. The County is committed to communicating openly and transparently with the Water Board as new impacts emerge over the coming weeks and months.

Public Education and Outreach

Current directives from the County Public Health Officer prohibit gatherings of any kind. As a result, beginning in mid-March 2020, the County began to cancel all in-person community, industry, and school outreach events as well as community cleanups. While we will continue to disseminate public outreach messages where possible via websites, e-mail, social media, and other remote means, the Public Health Officer's directives significantly affect our ability to comply with Permit provisions E.7.a.3 and E.7.b.3. We are exploring ways to partner with other County departments, permittees, and regional stakeholders to make additional stormwater educational materials and videos available through existing on-line platforms that reach the target audiences referenced in the above Permit sections.

Mr. Gibson
March 27, 2020

Water Quality Monitoring

Although the County and its consultants continue to carry out required water quality monitoring, the COVID-19 emergency has impacted the means and cost of compliance. For example, water quality sampling that was previously conducted by two-person teams traveling in a single vehicle has now transitioned to two staff traveling in two separate vehicles. Having two staff in the field together is often necessary to ensure safety during sampling activities or to comply with required monitoring protocol (i.e., clean hands/dirty hands techniques for HF 183 sampling). To date, water quality laboratories that the County utilizes to support Permit compliance remain open for business. However, this could change at a moment's notice as the COVID-19 emergency evolves.

Compliance Inspection, Correction of Violations, and Escalated Enforcement

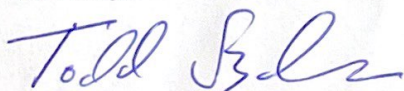
The County continues to conduct stormwater compliance inspections and respond to public complaints as required by the Permit. Some inspection processes remain virtually unchanged, such as those related to construction sites, other than incorporating measures to ensure adherence to social distancing guidelines. Other inspection processes have been modified to account for the special circumstances presented by the COVID-19 emergency. For example, as allowed in Permit section E.5.c.(1)(a), the County and its consultants are emphasizing drive-by inspections of industrial and commercial businesses, residential areas, and Structural BMPs where possible. Where in-person, on-site inspections are required, they are being performed only when appropriate social distancing can be assured.

Permit section E.6.c.(2) requires permittees to provide the Water Board with rationale when a return to compliance is not possible within 30 calendar days. Given the profound economic and health impacts faced by local businesses and community members during the COVID-19 emergency, it may become more common that return-to-compliance will require more than 30 calendar days. Every situation is unique, but we ask the Water Board to consider COVID-19 impacts as a reasonable rationale under this Permit requirement.

Permit section E.6.d. details the Water Board's expectations for carrying out escalated enforcement procedures to address Permit violations and other instances of non-compliance among the businesses and community members we regulate. During these very difficult times for our community, we ask you to consider temporarily suspending or amending the Permit's escalated enforcement provisions. Notably, the U.S EPA recently announced an [Enforcement Discretion Policy for COVID-19](#) which appears to support this approach. While the County intends to continue to ensure compliance wherever possible, we feel it is appropriate under the current circumstances to suspend punitive enforcement for all but the most egregious violations, such as those with the potential to significantly endanger human or environmental health.

Thank you for your consideration. The County remains committed to protecting water quality during this public health crisis and we will seek creative ways to comply with the Permit whenever possible. I can be reached at (619) 955-0403 or todd.snyder@sdcounty.ca.gov for questions.

Sincerely,



TODD SNYDER, Manager
Watershed Protection Program

San Diego Regional Water Quality Control Board

May 12, 2020

Sent by Email Only

Todd Snyder
Watershed Protection Program
County of San Diego
5510 Overland Avenue, Suite 410
San Diego, CA 92123
todd.snyder@sdcounty.ca.gov

In reply refer to/attn:
255223:HYu

Subject: Request for Compliance Relief due to COVID-19 Emergency, National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds within the San Diego Region, Order No. R9-2013-0001, as Amended, NDPEs No. CAS0109266 (Order)

Mr. Snyder:

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) received a letter dated March 27, 2020, from the County of San Diego (County) regarding compliance with requirements of the Order during the COVID-19 emergency, including the obligation to comply with the County Public Health Officer's directives. The County's letter addresses actual or potential noncompliance with requirements of the Order that could occur as a result of COVID-19 and requests relief from specific requirements as follows:

1. **Public Education.** The public education program implemented within the County's jurisdiction must include pollutant control education and training measures for target audiences determined and prioritized by the County based on high risk behaviors and pollutants of concern as required by provision E.7.a.(3) of the Order. The County reports that these requirements cannot be timely met due to the cancelation of all in-person community, industry, and school outreach events in response to the COVID-19 emergency and the County Public Health Officer's directives.
2. **Public Participation.** The public participation program implemented within the County's jurisdiction must include opportunities for members of the public to participate in programs and/or activities that can result in the prevention or elimination of the discharge of pollutants into and from the MS4 as required under provision E.7.b.(3) of the Order. The County reports that current directives from the County Public Health Officer prohibit gatherings of any kind and all in-person

community, industry, and school outreach events, as well as community cleanups, have been canceled.

3. **Water Quality Monitoring.** The County reports that social distancing restrictions imposed to limit the spread of COVID-19 have impacted the means and cost of compliance with water quality monitoring required under provision II.D of the Order. The County cited an example of this where water quality sampling that was previously conducted by two-person teams traveling in a single vehicle has now transitioned to two staff traveling in separate vehicles. The County continues to conduct monitoring since the laboratories remain open and available to produce timely sample results and consultants continue to provide services. However, the County maintains that the availability of laboratory services relied upon for water quality monitoring could be subject to interruption as the COVID-19 emergency evolves and lead to noncompliance with monitoring requirements.
4. **Existing Development Inspections.** Inspections of inventoried existing development sites are required under provision E.5.c. of the Order to ensure compliance with applicable local ordinances and permits, and the requirements of the Order. The County reports it is continuing to conduct storm water compliance inspections and respond to public complaints as required by provision E.5.c.(1)(a) of the Order. The County is using drive-by inspections of industrial and commercial businesses, residential areas, and structural BMPs where possible and conducting in-person on-site inspections only when necessary and when social distancing can be assured. Relief from the requirements described in provision E.5.c of the Order is requested for inspection sites where conformance with current governmental social distancing directives and guidelines related to COVID-19 cannot be assured.
5. **Correction to Violations.** Provision E.6.c.(1) of the Order provides that the County must enforce its legal authority to hold dischargers to its MS4 accountable for correcting any violation(s) in a timely manner with the goal of correcting the violation(s) within 30 calendar days. Provision E.6.c.(2) of the Order requires the County to provide the San Diego Water Board with written supporting rationale when a return to compliance for a discharger is not possible within 30 calendar days. The County reports that it may become more common that a return-to-compliance will require more than 30-days and asks the San Diego Water Board to consider COVID-19 impacts as a reasonable supporting rationale under provision E.6.c.(2) of the Order.
6. **Escalated Enforcement.** Provision E.6.d.(1) of the Order requires that the County include escalated enforcement in any enforcement scenario where a violation or other non-compliance is determined to cause or contribute to the highest priority water quality conditions identified in the Water Quality Improvement Plan. Provisions E.6.d.(1) and (3) require the County to carry out escalated enforcement procedures to address violations and other instances of non-compliance by dischargers to its MS4. The County intends to continue to ensure compliance where possible but requests temporary suspension or amendment of the escalated enforcement

requirements of provision E.6.d. for all but the most egregious violations during the COVID-19 emergency.

Determinations on the Compliance Date Extension Requests

The San Diego Water Board continues to closely monitor the COVID-19 situation with a focus on protection of public health, safety, and the environment and continuity of timely compliance by the regulated community with all Water Board orders and other requirements is among the highest priorities. The San Diego Water Board recognizes the challenges posed by COVID-19, values the safety of the regulated community and the public, and does not want to put anyone at risk for contracting COVID-19. The San Diego Water Board has evaluated the County's requests in accordance with these principles and the recently issued State Water Resources Control Board (State Water Board) guidance regarding permit compliance obligations in light of COVID-19.

Under the current circumstances and based on the limited information provided by the County in the March 27, 2020 letter, the San Diego Water Board has made the following determinations regarding the requests for compliance relief due to the COVID-19 emergency:

1. **Public Education and Public Participation.** Public education and public participation requirements of provision E.7 of the Order pertaining to in-person activities that are incompatible with current directives of Governor Newsom's Executive Order N-33-20 or the County Public Health Officer related to COVID-19 are suspended. This suspension of public education and outreach requirements in provision E.7 for incompatible in-person activities is effective immediately and is only in effect until the County is notified by the San Diego Water Board to resume all public education and participation activities in accordance with the requirements of the Order. The County is expected to continue to disseminate public education messages via websites, e-mail, social media, and other remote means, as appropriate under the requirements of provision E.7 of the Order and compatible with governmental directives related to COVID-19.
2. **Water Quality Monitoring.** Relief from specific water quality monitoring requirements in provision II.D of the Order was not requested by the County. The County must continue water quality monitoring in accordance with the specified due dates required in provision II.D of the Order. Failure to comply with the specified monitoring requirements and due dates of the Order may subject the County to enforcement actions by the San Diego Water Board including imposition of administrative civil liability of up to \$10,000 per day per violation, referral to the State Attorney General for injunctive relief, or any other enforcement action authorized by law. The County may renew the request for relief from water quality monitoring requirements if circumstances change regarding the availability of key staff and contractors or the ability of laboratories to timely analyze samples and provide results.
3. **Existing Development Inspections.** Requirements to conduct in-person on-site inspections of inventoried existing development sites described in provision E.5.c of

the Order are suspended for sites where the inspections cannot be conducted in conformance with current governmental social distancing directives and guidelines related to COVID-19. This suspension is effective immediately and is only in effect until the County is notified by the San Diego Water Board to resume all in-person on-site inspections activities in accordance with the requirements of the Order. The County shall continue to conduct inspections of such sites using drive-by inspection methods to verify best management practices (BMP) implementation where possible and feasible.

4. **Correction to Violations.** The San Diego Water Board will consider circumstances, including the COVID-19 emergency, in determining whether an enforcement response by the County taking more than 30 days to compel compliance is appropriate under the requirements of provision E.6.c.(2) of the Order. The County shall record detailed supporting rationale identifying how COVID-19 was the cause of the delay in enforcement, and the decisions and actions taken in response, including best efforts and steps taken to compel compliance at the earliest opportunity. The County is expected to document and maintain records of the enforcement determinations on a case-by case basis in the applicable electronic database or tabular system used to track violations and corrective actions as required under provision E.6.c.(2) of the Order. The County is also expected to report any instances of enforcement discretion, exercised in response to COVID-19 under provision E.6.c of the Order, in the 2019/2020 Annual Jurisdictional Runoff Management Report due January 31, 2021.
5. **Escalated Enforcement.** The San Diego Water Board denies the County's request for temporary suspension or amendment of the escalated enforcement requirements in provision E.6.d. of the Order to limit its applicability to only the most egregious violations. The Order already provides flexibility for the County to exercise enforcement discretion. For example, provision E.6.d.(2) of the Order allows the County to provide rationale documenting circumstances; this could include citing circumstances such as specifically how COVID-19 was the cause of the noncompliance or an underlying factor in a decision to not escalate enforcement. As required under provision E.6.d.(2) of the Order, the County is expected to document and maintain records of its determinations not to escalate enforcement actions on a case-by-case basis in the applicable electronic database or tabular system used to track violations. The County is also expected to report any instances of enforcement discretion, exercised under provision E.6.d of the Order, in the 2019/2020 Annual Jurisdictional Runoff Management Report due January 31, 2021.

Except as otherwise stipulated in the San Diego Water Board determinations above, all the requirements of the Order remain in full force and effect. In the event that circumstances change that allow for the County to resume required activities in compliance with the Order prior to notification by the San Diego Water Board that the suspension of requirements cited above is terminated, then the County must notify the Board immediately of the change in circumstances and comply with the Order as soon as possible.

The San Diego Water Board appreciates your assistance and efforts to continue the important work to protect human health and the environment, while ensuring the safety of your employees and the community we seek to protect. Additional information is available at the State Water Board's website (https://www.waterboards.ca.gov/resources/covid-19_updates).

In the subject line of any response please include the reference number 255223:HYu. If you have any questions or concerns, please feel free to reach out to Helen Yu at Helen.Yu@waterboards.ca.gov.

Respectfully,

David W. Gibson
Digitally signed by
David W. Gibson
Date: 2020.05.12
16:15:38 -07'00'

David W. Gibson
Executive Officer

- cc: Helen Yu, San Diego Water Board, Helen.Yu@waterboards.ca.gov
Laurie Walsh, San Diego Water Board, Laurie.Walsh@waterboards.ca.gov
Chiara Clemente, San Diego Water Board, Chiara.Clemente@waterboards.ca.gov
David Barker, San Diego Water Board, David.Barker@waterboards.ca.gov
Catherine Hagan, State Water Board, Catherine.Hagan@waterboards.ca.gov
Vincent Vu, State Water Board, Vincent.Vu@waterboards.ca.gov
David Boyers, State Water Board, David.Boyers@waterboards.ca.gov

Tech Staff Info & Use	
Order No.	R9-2013-0001, as amended
Party ID	39607
WDID	9 37M1000319 - 488806
NPDES No.	CA0109266
Reg. Measure ID	387335 (Regional MS4 Permit)
Place ID (PIN)	255223