

Jurisdictional Urban Runoff Management Plan

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4.0 DEVELOPMENT PLANNING COMPONENT

4.1 Introduction

The goal of this JURMP component is to establish a programmatic framework for the implementation of stormwater management activities. By providing and implementing these programs for new land development and redevelopment projects it is possible to minimize impacts to receiving waters and other environmental resources. This section provides a description of a comprehensive stormwater program the County plans to implement to address land-use, development and redevelopment elements.

4.2 Land Use Planning

4.2.1 Background

The County of San Diego's General Plan is the comprehensive long range plan that provides the framework for development planning in the unincorporated area. The General Plan addresses all aspects of the development process, including housing, traffic, safety, public facilities, land use, natural resources, and open space. In accordance with state law, all land use regulations and decisions made by the County must be consistent with the General Plan.

The Watershed Protection Ordinance (WPO) [Title 6, Division 7, Chapter 8, Section 67.801-67.814] provides the County legal authority to regulate stormwater activities as they relate to land use, development and redevelopment. The WPO (Attachment 2.2) defines the BMPs for planning, design, and post-construction for priority development projects. The land development process typically requires environmental assessment, project review and recommendation, and hearing body approval. The WPO is one of many land use regulations that all projects must comply with through the planning process.

In addition to the over arching land use regulations, watershed protection for land development is achieved through an action plan known as the Standard Urban Stormwater Mitigation Plan (SUSMP). The SUSMP is a jurisdictional requirement of the Permit which provides the planning framework and guidance for stormwater management on priority development sites. The SUSMP establishes rules for the proper design and layout of development plans. Within the SUSMP are policies and recommendations for BMPs including: source, site, treatment, hydromodification and low impact development (LID) BMPs. The WPO establishes the requirements for BMPs while the SUSMP provides the planning method and guidance in which to meet the requirements. The SUSMP contains the Stormwater Management Plan (SWMP) template for use by project applicants to select appropriate BMPs for each project site.

The stormwater planning hierarchy is demonstrated in Figure 4.1.

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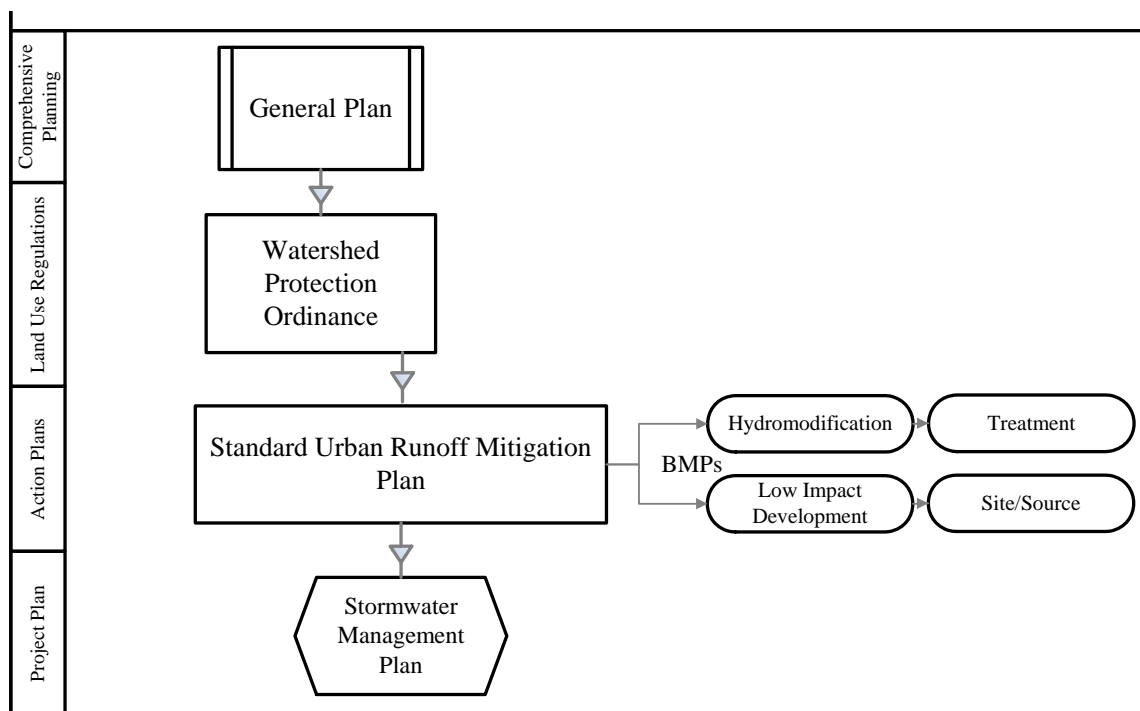


Figure 4.1 - Planning Hierarchy for Stormwater Management

The following sections discuss these components of the land development planning process.

4.2.2 Source Characterization

Urban development can negatively impact water quality and watershed health by increasing impervious surface area and by introducing new pollutant sources and pollutant-generating activities that accompany different types of land use. Changes in land surface characteristics through development changes the natural course of stormwater runoff by altering the runoff velocity and volume. These changes increase the potential for erosion and also become mechanisms of collection and transport for pollutants that are from various anthropogenic sources such as trash, oils and grease from vehicle use, fertilizers and pesticides from landscape management, erosion and sedimentation from soil disturbance, wash water, and wastes from materials management. The General Plan specifies the type and intensity of land uses allowed in the unincorporated areas of the County. Certain land use types have anticipated categories of pollutants associated with their use that can have varying levels of impacts on water quality. Industrial land use types for example, typically have pollutants on site and have an increased potential for pollutants to move off the site. Table 4. 1 below identifies the anticipated and potential pollutants of concern for each of the land use types.

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Table 4. 1 - Anticipated Pollutants of Concern Generated by Land Use Type

Priority Project Land Use Type	General Pollutant Categories								
	Sediments	Nutrients	Heavy Metals	Organic Compounds	Trash & Debris	Oxygen Demanding Substances	Oil & Grease	Bacteria & Viruses	Pesticides
Residential Development	X	X			X	X	X	X	X
Commercial Development >1 Acre	P ⁽¹⁾	P ⁽¹⁾		P ⁽²⁾	X	P ⁽⁵⁾	X	P ⁽³⁾	P ⁽⁵⁾
Industrial development	X		X	X	X	X	X		
Streets, Highways & Freeways	X	P ⁽¹⁾	X	X ⁽⁴⁾	X	P ⁽⁵⁾	X		
X = anticipated P = potential (1) A potential pollutant if landscaping exists on-site (2) A potential pollutant if the project includes uncovered parking areas (3) A potential pollutant if land use involves food or animal waste products (4) Including petroleum hydrocarbons (5) Including solvents									

4.2.3 Best Management Practice Requirements

Many land use regulations and restrictions are put in place by jurisdictions to protect resources and beneficial uses. In addition to protecting surface water quality, the County is responsible for protecting the aesthetics, biological resources, mineral resources, agricultural resources, cultural resources, recreational spaces, air quality, geological resources, as well as planning for population housing and providing adequate transportation routes within the region. Through this planning process the County decides how to use and protect natural resources, financial capital, and people to achieve and maintain healthy communities and a high quality of life. Protecting surface water quality through land use regulations is one of the goals of the General Plan and through the County's many land use regulations "best management practices" are being implemented.

4.2.4 Program Implementation

4.2.4.1 General Plan Update

Municipal Stormwater Permit Section D.1.a. requires each Copermittee to "revise as needed its General Plan or equivalent (e.g., Comprehensive, Master or Community Plan). The purpose of the General Plan revision is to provide effective water quality and watershed protection principles and policies. These principles and policies assist in directing land use decisions and require implementation of consistent water quality protection measures for Development Projects."

In response to the requirements of the Permit, the County analyzed its General Plan to assess the effectiveness of existing goals and policies related to water quality, watershed protection, and stormwater pollution. The County is in the process of comprehensively updating its existing

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General Plan by developing goals and policies that are being drafted to protect water quality and watersheds, and to minimize stormwater pollution. For example, one of the draft-General Plan goals is “protection and maintenance of watershed, aquifer-recharge areas, and natural drainage systems to maintain high quality water resources”. These future goals and policies will replace those found in the existing regional elements, as well as some of the Community Plans, and will primarily be addressed in the updated Conservation and Open Space Element (general watershed and water quality goals and policies), the Circulation Element (low impact development applications for roadways), and the Safety Element (floodplain and floodway management).

The General Plan is currently scheduled to be presented to the Board of Supervisors for approval in the fall of 2010. Table 4.2 provides a tentative timeline for completion of various General Plan update milestones.

Table 4.2 - General Plan Update Revision Timeline

Milestone	Target Date
Draft Regional Elements	July 2008
Technical and Stakeholder Review	July 2009
Implementation Manual and Programs	September 2009
Draft Environmental Impact Report	November 2009
Planning Commission/Board of Supervisor Hearings	Ongoing, progress reports due May and July 2008 and 2009, respectively
Final Adoption of General Plan Planning Commission and Board of Supervisors Hearings	Final Hearings September and November, 2010.

Figure 4.2 provides an overview of the major elements of the County’s implementation and assessment strategy for conducting the environmental review process and General Plan activities.

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General Plan and Environmental Review Activities			
Program Implementation  <ul style="list-style-type: none"> - DPLU Advance Planning - DPLU Project Planning - DPW Watershed Protection 	Target Audiences  <ul style="list-style-type: none"> - Community Planning & Sponsor Groups - Development Project Proponents 	Sources  <ul style="list-style-type: none"> - Urban Development and Redevelopment 	
OUTCOME LEVEL 1 Stormwater Program Activities	OUTCOME LEVEL 2 Knowledge & Awareness	OUTCOME LEVEL 3 Behaviors	OUTCOME LEVEL 4 Source Reductions
<u>Program Administration</u> <input checked="" type="checkbox"/> Program reviews & updates <u>Facilitation Activities</u> <input checked="" type="checkbox"/> Staff training <input checked="" type="checkbox"/> Education & outreach <input checked="" type="checkbox"/> Updates to General Plan and program documentation <input checked="" type="checkbox"/> Updates to environmental review processes <u>Feedback Activities</u> <input checked="" type="checkbox"/> Special investigations	<input checked="" type="checkbox"/> Basic concepts <input checked="" type="checkbox"/> LID practices & requirements	<input checked="" type="checkbox"/> Not Targeted or Assessed	<input checked="" type="checkbox"/> Not Targeted or Assessed

Figure 4.2 –Implementation and Assessment Strategy for Land Use Planning / Environmental Review Activities

4.2.4.2 Watershed Protection Ordinance (WPO) Update

The WPO establishes stormwater requirements for managing and controlling discharges on existing sites and development sites. In response to new development planning requirements in the Permit, the WPO was amended and approved by the County of San Diego's Board of Supervisors on March 12, 2008. The WPO update includes new requirements for low impact development (LID) BMPs and hydromodification management (HMP). In addition, portions of the Stormwater Standards Manual (SSM) that call for regulatory authority have been incorporated into the WPO. County staff will be updating the SSM as a stand alone technical reference manual in the near future. Since portions of the SSM have been included within the WPO, the organizational structure of the WPO has also been revised, clarifying the existing requirements and streamlining the existing regulatory process. Changes made to the WPO are reflected in the revised SUSMP.

4.2.4.3 Standard Urban Stormwater Mitigation Plan (SUSMP) Update

4.2.4.3.1 *Model SUSMP*

The Copermittees organized a formal workgroup in December 2006, to address the revision of the Model SUSMP and the inclusion and development of a Hydromodification Management Plan (HMP). This workgroup continues to meet at regular intervals and is chaired by the County.

4.2.4.3.2 *Local SUSMP*

In an effort to facilitate the submittal of an updated local SUSMP for all jurisdictions by March 24th, the Copermittees collaborated on the development of a local SUSMP for regional consistency. The local SUSMP update (see Attachment 4.1) includes updated Best Management Practices (BMP) requirements, including:

1. The removal of obsolete or ineffective BMPs;
2. The addition of Low Impact Development (LID) and source control BMP requirements of Permit Sections D.1.d.(4) and (5);
3. The addition of LID BMPs for treatment, such as bioretention cells, swales, etc;
4. The addition of LID BMPs to tables and discussions addressing pollutant removal efficiencies of treatment control BMPs; and
5. The update of BMP tables with pollutant removal efficiencies for treatment control BMPs.

4.2.4.3.3 *Low Impact Development*

The County's *Low Impact Development Handbook—Stormwater Management Strategies* document was created in the winter of 2007, by a multidisciplinary Technical Advisory Committee. The document was released to the public on February 9, 2008, and serves as the guidance structure for the planning, application, design, and maintenance of LID BMPs. The

Copermittees will furthermore collectively establish LID feasibility and applicability criteria and develop specific LID requirements for future inclusion in the Model SUSMP.

4.2.4.3.4 *Hydromodification Management Plan (HMP)*

The Copermittees researched and reviewed successful HMPs in the state and extensively compared the HMP methodologies used in Santa Clara County and Contra Costa County. Using this research the Copermittees retained a consultant team that participated in both the Contra Costa and Santa Clara plans for support on the development of San Diego's HMP using a cost share formula. The Copermittees also assembled a Technical Advisory Committee (TAC) to assist in the development of methodology appropriate for the region. The TAC includes members from technical resource agencies (USGS, USACE, DWR, SCCWRP), academia, environmental interests groups (Coastkeeper), building and development community (BIA), and engineering/design and geotechnical areas of expertise. Similarly, the Copermittees are coordinating this work effort with the Southern California Coastal Water Research Project that is performing a regional hydromodification management study.

The Copermittees have modified the approach used by Contra Costa County to fulfill its interim HMP requirements. This approach utilizes curve-matching based on continuous simulation modeling. The range of flows to be managed under the curve-matching option is expressed as a percentage of the 5-year peak flow (Q5) based on the understanding that dominant discharge for Southern California streams is in the vicinity of Q5¹. The curve-matching range is presented as an estimate at this time and may be refined prior to adoption of the final Hydromodification Management Criteria.

4.2.4.3.5 *Submittals*

The Copermittees anticipate submitting an updated Model SUSMP to the RWQCB by July 24, 2008, for its review. Within one year of RWQCB acceptance of the Model SUSMP, the Copermittees must again update their local SUSMPs. Additionally, Copermittees must update local SUSMPs a third time, within 180 days of RWQCB acceptance of the Hydromodification Management Plan (to be submitted January 24, 2009).

¹ In the 1960's and 1970's the concept of dominant discharge (also referred to as channel forming discharge, or effective discharge) was developed to describe a single flow that could be used as short hand to explain how a channel formed. There were two lines of evidence: measurements of the channel capacity at bank-full stage mostly made in temperate humid regions tended to converge around a flow with a recurrence interval of around 2 years (Q2); and sediment transport measurements showed that the Q2 flow moved the most sediment cumulatively. The actual range is wide: values varied from slightly less than 1 year to more than 10 years, but with a cluster around Q2. Q2 (or Q1.5) thus became commonly used as shorthand for dominant discharge, though this usage is a little casual. When these experiments were repeated in Mediterranean and semi arid environments, the average dominant discharge tended to rise to around Q5. Because of the 'flashier' nature of both rainfall delivery and runoff concentration, Southern California is dominated by flows that occur less frequently than more temperate/humid environments. Eric Stein (SCCWRP) measured dominant discharge in Southern California (Coleman et al 2005) which quantified dominant discharge in terms of the widely used USGS regression estimate for Q and also by pro-rating nearby flow gages by watershed area. The first approach gives a mean dominant discharge for Southern California of Q5.8 (average of USGS column) and pro-rating gives an average of Q3.6 (average of pro-rated column). The average of both methods is Q4.7.

4.3 Environmental Review Process

All County discretionary permit applications undergo environmental review prescribed by the California Environmental Quality Act (CEQA). Part of this review involves an assessment of the project's potential water quality and cumulative impacts, which are documented on a CEQA Initial Study-Environmental Checklist Form. Section VIII of this checklist includes review questions specific to hydrology and water quality (Attachment 4.2). For each question, staff will review the project proposal and determine if the project will have: "No Impact", "Less Than Significant Impact", "Less Than Significant With Mitigation Incorporated", or a "Potentially Significant Impact". For each determination a description of the impact significance is included. Figure 4.3 is an example of completed CEQA Initial Study Section VIII, Question e):

To determine the threshold for significance, the County created *Guidelines for Determining Significance* under CEQA to provide a consistent, objective, and predictable evaluation of whether development projects in the unincorporated area will have "significant" environmental impacts. These significance determinations provide the guidance for answering the questions in each section of the Initial Study. Findings of significance generally lead to additional requirements for environmental review and/or mitigation.

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VIII. HYDROLOGY AND WATER QUALITY -- Would the project:

- e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Potentially Significant Unless Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant: DPW staff has reviewed the Stormwater Management Plan prepared by {name} submitted {date}. The document is substantially complete and complies with the WPO requirements for a Stormwater Management Plan (SWMP). The project proposes an {onsite cellular facility}. As outlined in the SWMP the project will implement site design measures, source control, and/or treatment control BMPs to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff. These measures will control erosion and sedimentation and satisfy waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego Municipal Permit (SDRWQCB Order No. 2001-01), as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP). The SWMP specifies and describes the implementation process of all BMPs that will address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream drainage swales. The Department of Public Works will ensure that the Plan is implemented as proposed. Due to these factors, it has been found that the project will not result in significantly increased erosion or sedimentation potential and will not alter any drainage patterns of the site or area on- or off-site. In addition, because erosion and sedimentation will be controlled within the boundaries of the project, the project will not contribute to a cumulatively considerable impact.

Figure 4.3 - Example of CEQA Initial Study, Section VIII, Question (e)

The *Surface Water Quality Guidelines* are used to evaluate whether a discretionary project may have adverse effects on surface water quality. The Guidelines provide an overview of local watersheds, summarizes existing federal and state regulations, describes typical pollutant effects on water quality and presents guidelines to determine significance under CEQA. The following five guidelines are used to determine significance under CEQA, each of which is described in greater detail in the document:

1. The project is a development project listed in County of San Diego, Code of Regulatory Ordinances (Regulatory Ordinances), Section 67.804(g), as amended, and does not comply with the standards set forth in the County Stormwater Standards Manual, Regulatory Ordinances Section 67.813, as amended, or the Additional Requirements for Land Disturbance Activities set forth in Regulatory Ordinances, Section 67.
2. The project would drain to a tributary of an impaired water body listed on the Clean Water Act Section 303(d) list, and will contribute substantial additional pollutant(s) for which the receiving water body is already impaired.

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3. The project would drain to a tributary of a drinking water reservoir and will contribute substantially more pollutant(s) than would normally runoff from the project site under natural conditions.
4. The project will contribute pollution in excess of that allowed by applicable State or local water quality objectives or will cause or contribute to the degradation of beneficial uses.
5. The project does not conform to applicable Federal, State, or local “Clean Water” statutes or regulations including, but not limited to, the Federal Water Pollution Control Act, California Porter-Cologne Water Quality Control Act, and the County of San Diego Watershed Protection, Stormwater Management, and Discharge Control Ordinance (WPO).

Once significance has been established using the Initial Study Form and the Guidelines, the Project Manager will give the applicant the opportunity to redesign the project to reduce any findings of significance to less than significant. For example, if a “Potentially Significant Impact” is selected on the CEQA Initial Study Form for Water Quality, the project proponents are directed to use the SUSMP and other water quality guidelines to increase mitigation through other project design considerations, best management practices (BMPs), and/or low impact development (LID) techniques. Once the project design has been negotiated and finalized a formal CEQA document is created and the project will be given either a CEQA Exemption (no impacts), Negative-declaration (less than significant impacts), or Environmental Impact Report (significant impacts). Please note, that through the requirements of the WPO and Municipal Permit, all water quality impacts must be reduced to a level of “less than significant with mitigation ” to proceed to hearing for final project approval.

4.4 Development Project Approval and Verification Process

4.4.1 Background

As described in the Land Use Planning section 4.2, the Watershed Protection Ordinance (WPO) establishes the County’s legal authority to regulate stormwater methodologies as outlined by the Permit. The WPO defines the stormwater requirements for managing and controlling discharges and establishes rules for the proper design and layout of development plans. The Standard Urban Stormwater Mitigation Plan (SUSMP) provides the jurisdictional planning framework and guidance for private and municipal stormwater management on development sites. Within the SUSMP are policies and recommendations for BMPs including: source, site, treatment, hydromodification and low impact development (LID) BMPs. The SUSMP contains the template Stormwater Management Plan (SWMP) for use by project applicants to select appropriate BMPs for each project site.

The County SUSMP is intended for use on both large and small projects processed through the County’s Department of Planning and Land Use (DPLU) or through the Department of Public Works (DPW) Land Development section. The application of the SUSMP is not limited to Priority Development Projects, but distinguishes those projects from other minor development

projects through the requirements of the Storm Water Management Plan (SWMP). The SUSMP also applies to County capital improvement projects.

Permit section D.1.d. sets out minimum requirements which must be addressed on a project basis during the approval process. This section describes the application of the County's local SUSMP and project approval process which ensures applicable standards are met for all projects.

4.4.2 Source Characterization

On a project level, water quality impacts may appear to be relatively insignificant. However, when these impacts are considered in context with the cumulative effects of urban development, water quality impacts may become quite significant. Project by project, urban development changes water quality and watershed health by cumulatively increasing impervious surfaces in a region and by introducing new pollutant-generating activities associated with the land use. Land use categories such as automotive repair shops, parking lots, hillside development, and retail gasoline outlets typically have pollutants on site that have an increased potential for pollutants to affect receiving waters. By characterizing each source on a project level and mitigating the effects, cumulative impacts can be reduced to the maximum extent practicable (MEP). Table 4.3 below identifies the anticipated pollutants of concern for each of the priority project categories.

4.4.3 Best Management Practice Requirements

As defined in the WPO, each proposed project is required to implement measures to ensure that (1) pollutant discharges and runoff flows from development are reduced to the maximum extent practicable; (2) receiving water quality objectives are not violated throughout the life of the project; and (3) runoff flows from development are managed to reduce erosive forces that may impact surface water beneficial use and/or habitat. The project SWMP determines the anticipated pollutants associated with the development and mitigates for these impacts with proposed BMPs. The following BMPs are addressed in the SWMP for each project proposal.

4.4.3.1 LID Practices

The WPO has incorporated LID BMPs in Section 67.807 "General BMP Requirements" to be applicable to all development projects with the potential to add pollutants to stormwater or to affect the flow rate or velocity of stormwater runoff. This requirement defines the general standard for LID. The more explicit LID requirements for Priority Development Projects (PDPs) have been included in Section 67.818 "Additional Planning, Design and Post-Construction Requirements for Land Development and Redevelopment Priority Development Projects". The SUSMP has been updated to include LID BMPs in Chapter 4, Section 1.

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Table 4.3 - Anticipated Pollutants of Concern by Priority Project Category

Priority Project Categories	General Pollutant Categories								
	Sediments	Nutrients	Heavy Metals	Organic Compounds	Trash & Debris	Oxygen Demanding Substances	Oil & Grease	Bacteria & Viruses	Pesticides
Detached Residential Development	X	X			X	X	X	X	X
Attached Residential Development	X	X			X	P ⁽¹⁾	P ⁽²⁾	P	X
Commercial Development >1 Acre	P ⁽¹⁾	P ⁽¹⁾		P ⁽²⁾	X	P ⁽⁵⁾	X	P ⁽³⁾	P ⁽⁵⁾
Heavy industry/industrial development	X		X	X	X	X	X		
Automotive Repair Shops			X	X ⁽⁴⁾⁽⁵⁾	X		X		
Restaurants					X	X	X	X	
Hillside Development >5,000 ft ²	X	X			X	X	X		X
Parking Lots	P ⁽¹⁾	P ⁽¹⁾	X		X	P ⁽¹⁾	X		P ⁽¹⁾
Retail Gasoline Outlets			X	X	X	X	X		
Streets, Highways & Freeways	X	P ⁽¹⁾	X	X ⁽⁴⁾	X	P ⁽⁵⁾	X		
X = anticipated P = potential (1) A potential pollutant if landscaping exists on-site (2) A potential pollutant if the project includes uncovered parking areas (3) A potential pollutant if land use involves food or animal waste products (4) Including petroleum hydrocarbons (5) Including solvents									

4.4.3.2 Interim HMP Requirements

The WPO has incorporated Interim HMP criteria in Section 67.812(b)(4). The interim criteria will be applied until the final Hydromodification Management Plan is implemented and is integrated into the Chapter 3 section 1.4 of the revised SUSMP. These interim criteria establish a range of runoff flow rates for which Priority Development Project post-project runoff flow rates and durations shall not exceed pre-project runoff flow rates and durations and apply to projects that disturb fifty (50) acres or more. This approach utilizes curve-matching based on continuous simulation modeling. The WPO also establishes criteria for projects seeking exemption from the interim criteria in Section 67.812(b)(4)(C).

4.4.3.3 Maintenance Requirements for Treatment Control BMPs

The WPO establishes the maintenance requirements of BMPs for all existing and new development permanent BMPs. Section 67.813 establishes requirements for maintenance plans, review of plans, easements, proof of mechanism to ensure long-term maintenance, and

enforcement. Chapter 5 of the SUSMP provides the specific details related to project review, and BMP Maintenance Plans. In addition, the SUSMP lays out several acceptable mechanisms for verifying BMP maintenance, as follows:

- Covenants;
- Legal agreements;
- Maintenance agreements;
- Special Districts; and/or
- Conditional Use permits

The County in its discretion may decline to accept any proposed mechanism for assuring BMP maintenance, repair or replacement that is not supported by an adequate and reliable source of funds.

4.4.3.4 Updates to BMPs

As new BMP technologies evolve, the County will consider the adoption of BMPs that are used by Caltrans or other agencies and those that have been proven to meet industry standards.

4.4.3.5 Waiver of Structural Treatment BMP Requirements

The WPO establishes a process for project proponents to be waived from the requirement of implementing structural treatment control BMPs in Section 67.812(g) based on infeasibility. Chapter 6 of the SUSMP defines the criteria for establishing infeasibility. Waivers may be granted only from structural treatment BMP and structural treatment BMP sizing requirements. Priority development projects, whether or not granted a waiver, may not cause or contribute to an exceedance of water quality objectives. Pollutants in runoff from projects granted a waiver must still be reduced to the maximum extent practicable.

4.4.4 Program Implementation

4.4.4.1 Standard Urban Stormwater Mitigation Plan (SUSMP) Project Review and Approval

Through the implementation of the SUSMP, projects are brought into compliance with the WPO and the Permit. Compliance is accomplished through a series of review processes throughout the County's Land Use Environmental Group (LUEG) Departments and Divisions. Table 4.4 provides a list of County staff and their associated responsibility for ensuring implementation of a successful stormwater program. See Figure 4.4 (DPLU) and Figure 4.5 (DPW) for relevant County department organizational charts.

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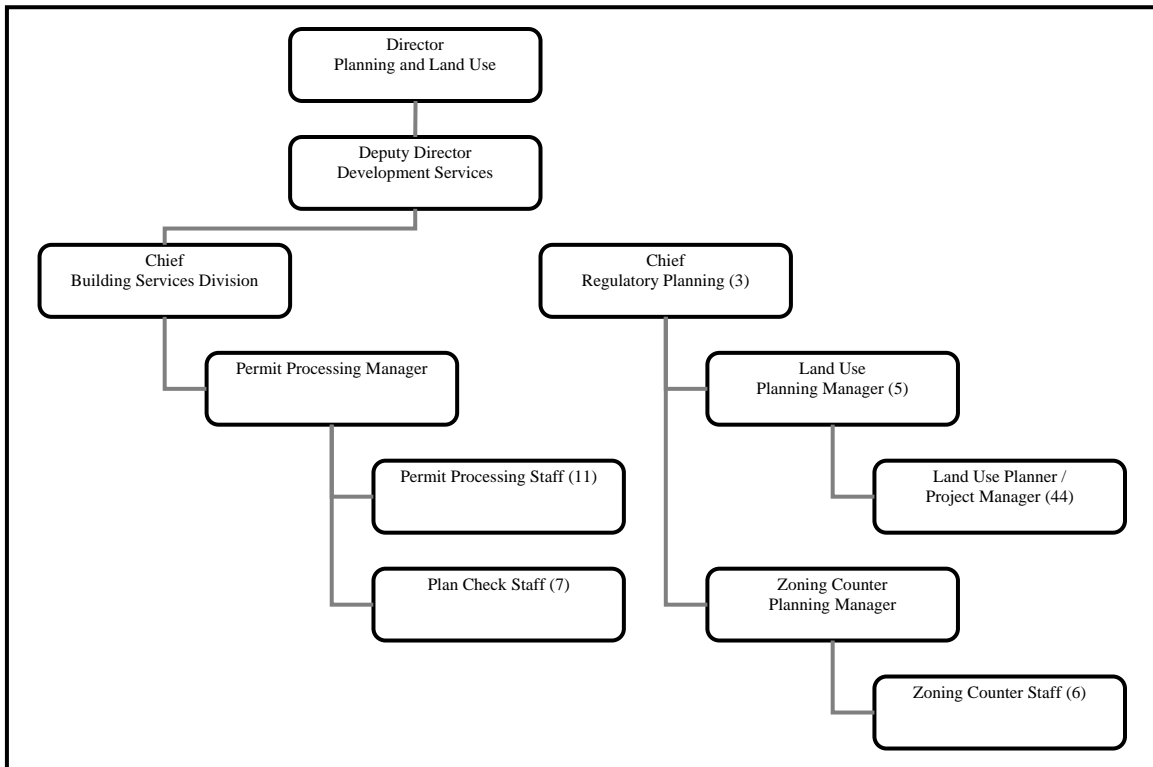


Figure 4.4 - DPLU Organizational Structure for the Development Project Approval and Verification Process

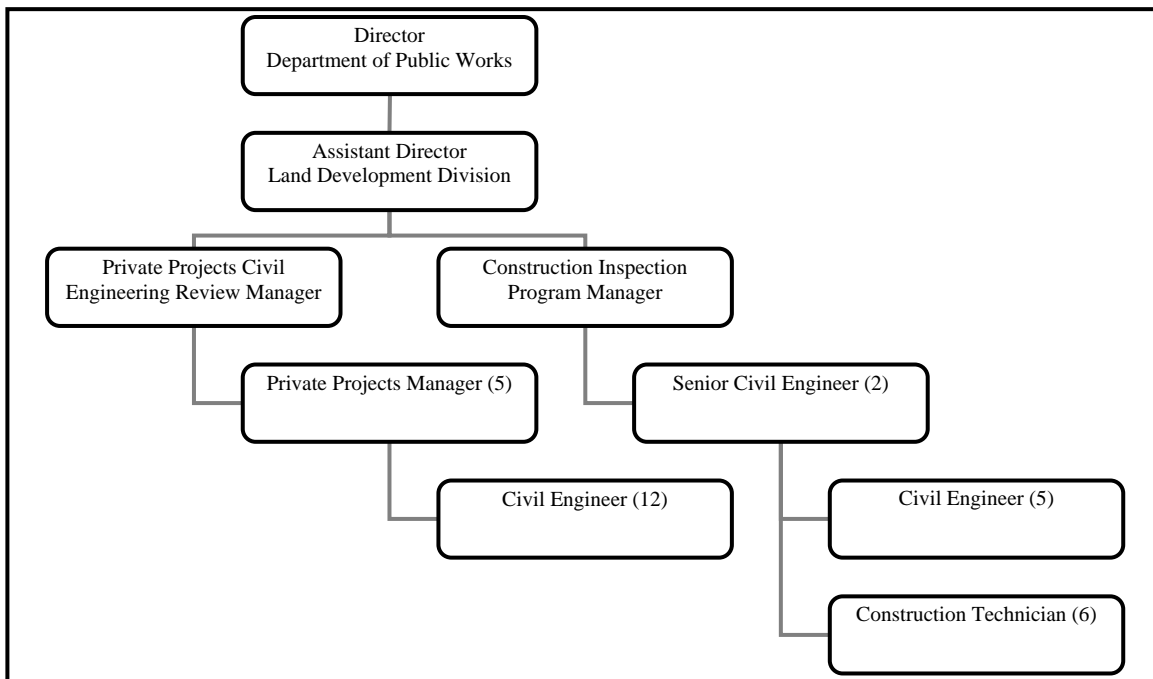


Figure 4.5 - DPW Organizational Structure for the Development Project Approval and Verification Process

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Table 4.4 - Program Implementation Roles and Responsibilities

Program Implementation Roles and Responsibilities for Development Planning Element		
Program Activity	Responsible Staff	Minimum Frequency
A. Program Planning and Administration		
Review of BMP requirements (SUSMP)	<ul style="list-style-type: none">▪ DPW Land Development▪ DPLU Regulatory▪ DPW Watershed Protection	As needed
Review of implementation strategies		Annual
B. Facilitation Activities		
Pre-Application meetings	<ul style="list-style-type: none">▪ DPLU Project Managers	As needed
Project Application Intake	<ul style="list-style-type: none">▪ DPLU Zoning Counter	As needed
Major SWMP (SUSMP) Review & Approval	<ul style="list-style-type: none">▪ DPW Private Projects Review	As needed
Minor SWMP Review and Approval	<ul style="list-style-type: none">▪ DPLU Building Plan Check▪ DPW Private Projects Review	As needed
Review of Project Application / CEQA	<ul style="list-style-type: none">▪ DPLU Project Managers▪ DPW Private Projects Review	As needed
BMP Maintenance Agreements	<ul style="list-style-type: none">▪ DPW Private Projects Review	As needed
Discretionary Permit Approval	<ul style="list-style-type: none">▪ Public Hearing Body	As needed
Ministerial Permit Processing and Approval	<ul style="list-style-type: none">▪ DPLU Building Plan Check▪ DEH Land Use	As needed
Municipal Staff Training	<ul style="list-style-type: none">▪ DPLU Regulatory▪ DPW Private Projects Review	Annual
Outreach	<ul style="list-style-type: none">▪ DPLU Zoning Counter▪ DPLU Project Managers▪ DPLU/DPW Websites	As needed
C. Feedback & Verification		
SWMP tracking	<ul style="list-style-type: none">▪ DPLU Building Plan Check▪ DPW Private Projects Review	As needed
Final SWMP BMP Verification	<ul style="list-style-type: none">▪ Building Inspection Staff▪ DPW Private Development Construction Inspectors	As needed
Treatment Control Inventory updates	<ul style="list-style-type: none">▪ DPW Watershed Protection	Annual
Certification of treatment control O&M	<ul style="list-style-type: none">▪ Flood Control (Roads)▪ Property Owner (Category II Maintenance agreement)▪ Special Districts	Annual
Treatment Control BMP inspections	<ul style="list-style-type: none">▪ DPW Watershed Protection	As needed
Complaint Investigations	<ul style="list-style-type: none">▪ DPW Watershed Protection	As needed
Enforcement	<ul style="list-style-type: none">▪ DPW Watershed Protection	As needed

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To ensure compliance with the Permit, WPO, and implementation plans (JURMP and SUSMP), County staff routinely reviews project inventories, BMP requirements, and implementation strategies associated with the plans. The Watershed Protection Program may assist in coordinating meetings with other County staff in DPLU and DPW to update and administrate these plans when necessary.

Figure 4.6 provides an overview of the major elements of the County's implementation and assessment strategy for conducting development project approvals and verifications.

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Project Approval and Verification Element			
Program Implementation  <ul style="list-style-type: none"> - DPLU Building Division - DPW Private Development & Construction Inspection - DPW, DPR, & DGS CIP - DPW Watershed Protection 	Target Audiences  <ul style="list-style-type: none"> - Developers, Project Proponents - Contractors, Sub-contractors, Workers 		Sources  <ul style="list-style-type: none"> - Developed Parcels
OUTCOME LEVEL 1	OUTCOME LEVEL 2	OUTCOME LEVEL 3	OUTCOME LEVEL 4
Stormwater Program Activities	Knowledge & Awareness	Behaviors	Source Reductions
<u>Program Administration</u> <input checked="" type="checkbox"/> Program reviews & updates <input checked="" type="checkbox"/> Source inventory updates <u>Facilitation Activities</u> <input checked="" type="checkbox"/> Staff training <input checked="" type="checkbox"/> Education & outreach <input checked="" type="checkbox"/> Project conditioning & approval <input checked="" type="checkbox"/> Enforcement / return to compliance <input checked="" type="checkbox"/> TCBMP notifications <u>Feedback Activities</u> <input checked="" type="checkbox"/> Site inspections	<input checked="" type="checkbox"/> Not Targeted or Assessed <input checked="" type="checkbox"/> Regulatory compliance		<input checked="" type="checkbox"/> Not Targeted or Assessed

Figure 4.6 –Implementation and Assessment Strategy for the Project Approval and Verification Element

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The following sections describe the different activities associated with the facilitation of the project review process, education of stormwater requirements, and BMP implementation.

4.4.4.1.1 Pre-Application Meetings

The County offers pre-application meetings to assist applicants who anticipate filing a discretionary land use permit application (required for large projects such as Tentative Maps and Major Use Permits). The purpose of the pre-application meeting is to advise the applicant of potential issues, constraints, and requirements that could be connected with the filing of an application. As part of the pre-application meeting for discretionary projects, GIS tools and preliminary project descriptions are used as part of preliminary assessment of stormwater pollution potential. Applicants will then be advised of filing requirements, general processing timelines, general cost estimates, and the requirements of the WPO as they could affect their project, including the requirement of the preparation of a Storm Water Management Plan.

4.4.4.1.2 Project Application Intake

Private project applicants will submit all project information to the zoning counter (discretionary) or building counter (ministerial). Application packets vary in size and scope based on the type of project being submitted. However, most discretionary and ministerial projects require the submittal of either a Minor or Major Stormwater Management Plan (SWMP), and projects that require a grading plan must also submit a hydrology/drainage study as explained SWMP section.

Stormwater Management Plan

In accordance with the WPO, the County requires the development of a SWMP to be submitted with those discretionary applications and ministerial permit applications identified in 67.803(c) of the WPO. Guidance on the preparation of a SWMP is provided to all applicants (see Attachment 4.1). The purpose of the SWMP is to mitigate stormwater impacts by identifying effective permanent BMPs for implementation. The SWMP review process takes into account the project location, receiving water quality, anticipated project impacts and associated pollutants, and mitigation for impacts with the selection of BMPs. The SWMP provides needed information to address both stormwater and non-stormwater issues. The Preliminary Grading Plan and Preliminary Hydrology/Drainage Study are an integral part of the SWMP and provide the technical basis for the SWMP (see below). However, changes and refinements to the SWMP may be required as technical review of the application and CEQA documentation continues. The SWMP requires but is not limited to the following elements:

- Water Quality Pollutants of Concern, Treatment Volume Based on Water Quality Design Storm, Site Plans and Adjacent Land Use, and Soil Characteristics;
- Mitigation Measures to protect water quality, Pollution Prevention BMPs (MEP Based), Site Design BMPs, Source Control BMPs, LID BMPs, and Structural Treatment BMPs;
- Mitigation Measures to prevent increases in downstream erosion to MEP, Site Design BMPs, Source Control BMPs, LID BMPs, and Structural Treatment BMPs;

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- Any infiltration BMPs proposed for use on site; and
- Agreements, easements, licenses relating to proposed BMP construction, location, maintenance, or changes in drainage character.

Prioritization

The County utilizes two types of stormwater management plans based on the project prioritization. Projects are prioritized using the WPO definition of “Priority Development Projects” as found in the Permit section (D.1.d.(2)). Projects that meet this definition must utilize the SUSMP and create a Major SWMP for the project. The Major SWMP will establish the construction activity prioritization for inspection and the application of treatment controls. As part of this process, staff from the DPLU and DPW will review the Major SWMP along with the Preliminary Grading Plan and additional hydrologic information submitted with the Project’s application package to determine what issues should be further addressed.

A SWMP for Minor Projects (Minor SWMP) is used for projects regarded as insignificant contributors to post-construction pollutant loading and for projects that are substantially complete or not located in urban areas, such as many of those that come through the Building Permit (ministerial) process. SWMP completion helps to ensure that effective BMPs are implemented; changes and refinements to the SWMP may be required as technical review of the application and completion of CEQA documentation continues.

Hydrology/Drainage Study

Project proposals that will involve a grading permit must provide a Preliminary Grading Plan. This Grading Plan must include a Preliminary Hydrology/Drainage Study prepared by a Registered Civil Engineer. In certain instances a Preliminary Hydrology/Drainage Study may be requested to supplement a SWMP even though the application does not require a grading permit. Staff will utilize all of these studies to evaluate necessary stormwater requirements, including but not limited to site design, LID, source control, and treatment control BMPs. The Preliminary Hydrology/Drainage Study shall include but is not limited to identification of:

- Pre- and post-construction hydrology on-site and downstream;
- Any potential discharges of stormwater off site and/or any increased potential for downstream erosion; and
- All structural BMPs required to address stormwater issues in compliance with the WPO and the Permit.

4.4.4.1.3 SWMP Tracking

SWMP tracking is managed in the KIVA™ database management software system. This database allows both the major and minor SWMPs to be tracked. Currently, these databases are inaccessible through GIS, however, the current project database in the KIVA™ has geocoded

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references for the records entered into the database. The geocoded records provide the County with the means to track and prioritize a watershed-based inventory.

4.4.4.1.4 Review of Project Application

Upon submittal of the project application, the SWMP is reviewed for compliance with the WPO and SUSMP by the DPW Land Development Review team, and by the DPLU Regulatory Project Manager. DPW staff assists the assigned Project Manager with the technical review the project application for stormwater compliance. The project is reviewed using the County's desktop-based GIS application, existing regional land use maps, and other related resources including the prioritization criteria from Permit section (D.1.d.(2)).

CEQA Review

As part of this review, staff will complete CEQA review using an Initial Study – Environmental Checklist Form. Section VIII of this checklist includes review questions specific to hydrology and water quality (Attachment 4.2). A complete discussion on determining surface water quality significance under CEQA is covered above in Section 4.3.

If a proposed project has been reviewed previously under CEQA prior to the new stormwater requirements of the Permit and WPO, and prior to final project approval, staff will revisit these documents to determine if adequate information has been included to address the requirements under the revised WPO. If no such information exists in the previous documents, or the information does not adequately address the requirements under the revised WPO, a new or updated SWMP will be requested for the project. Even if a project is exempt from the CEQA process, it still must be found in compliance with the WPO and go through the SWMP review process.

4.4.4.1.5 Maintenance Agreements

If a Treatment Control BMP is included as mitigation for the PDPs potential water quality impacts, a BMP Maintenance Agreement must be included for approval. The BMP Maintenance Agreement will identify the type of Treatment Control BMP to be installed at the project; will describe the post-construction maintenance activities, indicators, measurements, and frequencies; and will identify the Responsible Party for maintaining the BMP in perpetuity. If any changes to the project occur during the construction phase, modifications must be properly engineered by the Resident Engineer, updated in the Maintenance Agreement and then be reviewed and approved by designated County staff. Any changes in the Responsible Party (for example, the transfer of ownership from the developer to a HOA), must also be updated and confirmed by designated County staff before the project can be verified and a certificate of occupancy issued.

4.4.4.1.6 Conditions of Project Approval

Recommendations from CEQA review and the SWMP that require permanent BMPs for water quality mitigation are then used in formulating conditions of approval for the project. The

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conditions will typically specify that the requirements of the Stormwater Management Plan be implemented. The conditions are structured to assure that grading or other activities that could threaten water quality or contribute to contaminated stormwater runoff will not be allowed until all required BMPs and other mitigating actions are included in the SWMP to the satisfaction of the County.

In addition, if the proposed structural BMPs require long-term maintenance, the applicant will be required to take all necessary measures, to satisfy the County, to assure that ongoing maintenance will occur to prevent water quality pollution. The SUSMP identifies several methods of meeting this requirement, which may be accepted by the County.

4.4.4.1.7 Final SWMP BMP Verification (prior to occupancy)

The verification that BMPs have been constructed in compliance with all specifications, plans and permits for all projects subject to the SUSMP occurs upon the completion of the following construction activity:

1. At the end of grading activities; and
2. At the end of building activities.

BMPs that are constructed during major grading or minor grading activities, such as detention basins, are verified by DPW Construction Inspectors as part of their final inspection. During the final inspection of grading, inspectors verify that the site matches the approved grading plan, which should reflect the post-construction BMP requirements from the SWMP.

BMPs that are part of the post-grading construction, such as BMPs for material/trash storage areas or efficient irrigation systems, are verified by the DPLU Building as part of their final inspection. During final inspection for building permits, inspectors verify that the site matches the approved building plans. For projects subject to the minor SWMP, the inspector is responsible for verifying both the construction and post-construction BMPs that are indicated in the plan. For permits that are part of a Priority Development Projects, the Building Structural Engineers review the Major SWMP and ensure that the building plans meet the planned BMP for that specific portion of the project related to that specific area.

4.4.4.2 Staff Training

Designated County staff with implementation responsibilities must be trained in accordance with JURMP Section 10.2.

4.4.4.3 Outreach

As part of the facilitation process, education of stormwater management techniques and requirements are ongoing throughout the planning, development, and implementation process. Education targeted to the development and redevelopment community includes direct staff interaction with the public, the development and distribution of informational handouts, and

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targeted outreach events. In addition, the County continues to use its website as an informational resource for the public and permit applicants.

Interaction with County Staff

Project applicants learn about water quality and stormwater management during initial interface with Zoning Counter staff upon inquiry of the project submittal package. Potential applicants are given a submittal package, which includes the SWMP pre-intake checklist. Applicants can learn about County codes and ordinances when they attend a pre-application meeting to discuss their preliminary project. WPO assistance typically includes identifying project locations in relation to hydrologic units and environmentally sensitive areas (ESAs), explaining project requirements, and locating materials for SWMP completion. Once the applicant has submitted the project package for discretionary review, County staff may meet with the applicant or may request more information regarding the stormwater management techniques for impact mitigation. The DPLU Project Manager is available to answer project related questions regarding water quality impacts.

County Websites

The County provides extensive website resources to assist applicants in complying with new development and redevelopment requirements. Links to stormwater information related to new development and redevelopment is located on both the DPLU and DPW web sites. Hydrology and water quality information is also located on the DPLU website at the following URL:

<http://www.sdcounty.ca.gov/dplu/procguid.html#hydro>

Downloadable documents are one example of the County's website resources. The WPO, Groundwater Ordinance, the SUSMP, LID Handbook, and SWMP formats are good examples of the downloadable documents.

The DPW's website is located at the following URL:

<http://www.sdcounty.ca.gov/dpw/watersheds.html>

The DPW website contains links to numerous resources, including Major and Minor SWMP Forms, Grading Plan Guidelines, Preliminary Hydrology/Drainage Study Guidelines, a SUSMP Process Flow Chart, and an 85th Percentile Precipitation Map.

Training and Outreach Events

The County provides and participates in outreach and education events for local industries and associations. Stormwater related training seminars and workshops are commonly held throughout the permit cycle for the land development industry targeting planners, engineers, contractors, plan-checkers, and developers.

4.4.4.4 Treatment Control BMP Maintenance Tracking

4.4.4.4.1 *Treatment Control BMP Inventory*

The post-construction inventory will track all approved and verified Treatment Control BMPs installed from the previous permit cycle to present. The inventory includes the following minimum data:

- Watershed (HSU);
- Priority (inspection frequency);
- Treatment Control BMP type;
- Location (Assessor's Parcel No., address, GIS coordinates, when available);
- Date of construction;
- Responsible party information for long-term maintenance;
- Inspection date;
- Inspection results and effectiveness of Treatment Control BMP maintenance;
- Corrective actions; and
- Information on annual verification of maintenance.

Additional Treatment Control BMPs will be added to the inventory as they are verified at the end of the construction phase as a condition prior to occupancy. Although rare, reclassification of an existing Treatment Control BMP (e.g., after a natural disaster or as part of major re-development), can occur and the inventory will be updated accordingly.

The SWMP data for Treatment Control BMPs are entered into departmental MS Excel database routinely. There is a County-wide movement of data-sharing from the existing KIVA™ database to Accela™. The County is developing the database for Treatment Control BMP tracking. All County staff with duties pertaining to the tracking of Treatment Control BMPs through the various phases is expected to be trained as soon as the database is functioning properly. The Treatment Control BMP tracking database has first priority for implementation of all the County databases to be using Accela™.

Attachment 4.3 lists the locations of completed private development projects with approved Treatment Control BMPs. All pertinent information, with the exception of maintenance BMP types and HSUs, was obtained. These tools will allow the County to collect and track the minimum inventory data from the plan submittal stage to the issuance of the Certificate of Occupancy. Changes in Responsible Party information or BMP design/installation shall be duly verified (reviewed and approved) by the designated County staff before allowing the project to pass to the next component.

4.4.4.4.2 *Treatment Control BMP Prioritization*

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The prioritization of approved treatment control BMP projects took into consideration Treatment Control BMP size, recommended maintenance frequency, likelihood of operational and maintenance issues, location, receiving water quality and other pertinent issues to the project. Generally, the type of Treatment Control BMP then can dictate the classification of the project.. This being said, any site that has a hydrodynamic separator or an extended detention basin would automatically be classified as a high priority project. A project that has an infiltration trench, permeable pavement or drainage inserts would be classified as medium, and a site that only has biofilters (swales, strips) would be a low priority site. If the Treatment Control BMP is designed to drain to an Environmentally Sensitive Area or CWA 303d impaired waterbody, the project may be re-prioritized upwards.

4.4.4.4.3 Treatment Control BMP Maintenance Verifications

Private Treatment Control BMP (Low Priority)

For project sites that are Low Priority, the Responsible Party will be required to submit annually a Self-Verification Document (SVD) (Attachment 4.4) confirming that the Low Priority Treatment Control BMP has been maintained. The SVD shall be submitted to the County Department of Public Works, Watershed Protection Program, for review and approval. This Low Priority SVD consists of a signed certification checklist verifying that the responsible party information is correct and that the maintenance has been performed.

Any complaints regarding low priority Treatment Control BMPs will also initiate an investigation and inspection.

Private Treatment Control BMP (Medium Priority)

At a minimum, each private Responsible Party (homeowner, developer, HOA, etc.) will be required to submit annually to the Department of Public Works, Watershed Protection Program, an SVD confirming that the Medium Priority Treatment Control BMP has been maintained (inspected, cleaned, repaired, etc.) for that year. The Medium Priority SVD (Attachment 4.4) consists of a signed form and supporting documentation such as copies of the service invoices and photographic documentation (before-and-after pictures). Maintenance logs will be kept on-site and made available for review by the County inspector. Fifty percent of all drainage inserts will be inspected annually. Moreover, any complaints regarding medium priority TC-BMPs will also initiate an investigation and inspection.

Private Treatment Control BMP (High Priority)

All projects with high priority Treatment Control BMPs will be inspected each year prior to October 1st. The Responsible Parties will also be required to keep an SVD (Attachment 4.4) confirming that the High Priority Treatment Control BMP has been maintained (inspected, cleaned, repaired, etc.) for that year.

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County Special District Treatment Control BMP Maintenance Verification

For private Treatment Control BMPs maintained by the County, the division responsible for maintaining them shall submit to the DPW Watershed Protection Program an SVD or the equivalent that illustrates the approved Treatment Control BMP has routinely been inspected and maintained as necessary. Once approved by the DPW Watershed Protection Program, the SVD shall serve as the inspection for that given year.

County Municipal Facilities Treatment Control BMPs Category 4 (High, Medium, Low)

The County division responsible for maintaining Treatment Control BMPs shall submit an SVD or the equivalent indicating that the approved treatment control BMP has been inspected and maintained as necessary. The SVD will be sent annually to the DPW Watershed Protection Program.

4.4.4.4.4 Treatment Control BMP Inspection and Oversight

Compliance Inspections

As required under the Permit R9-2007-0001, the County will inspect annually 100% of projects with High Priority Treatment Control BMPs and 50% of the projects with drain inserts (Medium Priority). In addition, a minimum of 20% of the total number of projects with approved Treatment Control BMPs, and a maximum of 200% of the average number of projects with Treatment Control BMPs approved each year, will be inspected each year.

All inspections shall be conducted by County staff. If it chooses, the County can contract with outside inspection services; those personnel shall be recognized as County inspection staff for the duration and terms of the contract. However, enforcement of regulations, permit conditions, and ordinances shall be done by the Watershed Protection Program or other applicable County unit.

Category 3 and 4 inspections shall be conducted by Special District and County staff, respectively, as part of the routine maintenance of the Treatment Control BMPs. Staff will follow standardized inspection procedures and complete an SVD or equivalent. The Watershed Protection Program shall review the inspection reports for final approval.

Quality Assurance Inspections

As an additional measure, the County shall conduct Quality Assurance (QA) Inspections in cases of missing, incomplete, or questionable SVDs; in response to complaints; and as a random inventory check. A BMP Inspection Report, with supporting documentation such as pictures, will be completed for each QA Inspection.

All sites where regular inspections were not conducted and the SVD was relied upon may be subject to a QA inspection. If the site had a complaint registered against it or if the SVD is not received or is deemed insufficient or questionable, a QA inspection will be conducted. A QA inspection will fulfill any inspection requirements for that reporting period.

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Category 3 BMPs. The Watershed Protection Program will conduct random inspections to ensure consistency for priority BMPs. Each year, the County will select 20% of the Category 3 inventory for QA inspection. Priority will be given to those sites submitting insufficient documentation. The remaining sites will be selected so that each County department that is responsible for TC-BMP maintenance has at least one QA inspection.

Category 4 BMPs. The Watershed Protection Program will conduct random inspections to ensure consistency for priority BMPs. Each year, the County will select 20% of the Category 4 inventory for QA inspection. Priority will be given to those sites submitting insufficient documentation. The remaining sites will be selected so that each County department that is responsible for TC-BMP maintenance has at least one QA inspection.

Enforcement

Complaints. The Watershed Protection Program shall respond to citizen or agency complaints about any category Treatment Control BMP, privately or publicly maintained. Adequate enforcement or administrative action shall be utilized to ensure a return to compliance (adequate BMP maintenance and certification) by the Responsible Party.

Private Treatment Control BMPs that have been altered shall be deemed non-functional and not in compliance with County ordinance.

Private Responsible Party. The County will utilize the following enforcement tools, where appropriate, in cases of Category 1 or 2 non-compliance: Notice of Violation, Administrative Citation (fines escalating from \$100 to a maximum of \$10,000), Clean-up and Abatement Notices (in which the County cleans or repairs the Treatment Control BMP and then charges the Responsible Party), suspension or denial of a use permit (of which the Treatment Control BMP was a condition of the permit), or other appropriate action.

The County will report to the Regional Board all enforcement cases involving administrative citations.

Special District or County as Responsible Party. The Watershed Protection Program will prepare and issue an Administrative Report of Non-Compliance (ARNC) and submit this report to the appropriate upper management personnel of the County division with direct oversight of the BMP. The report will request a response of corrective actions, with pertinent supporting documentation, to be submitted in a timely manner to the Watershed Protection Program by the appropriate manager. All ARNCs shall be made readily available to the RWQCB on request.

Funding

Proposed funding mechanisms for Category 3 and 4 maintenance activities are described in SUSMP section 5.2 (Attachment 4.1).

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4.5 Development Planning Component Effectiveness Assessment

The County's effectiveness assessment approach utilizes a variety of outcomes and measures to determine the success of implementation of each JURMP element or component. As appropriate for each, a suite of measures are tracked across the following outcome levels:

Level 1: Compliance with Activity-based Permit Requirements

Level 2: Changes in Attitudes, Knowledge, & Awareness

Level 3: Behavioral Change & BMP Implementation

Level 4: Source Load Reductions

Table 4.5 below summarizes the Level 1 outcomes and measures provisionally established for the Land Use Planning Component. Additional detail on the County's approach, including the assessment of Level 2 and 3 measures, is provided in section 13.0.

Table 4.5 - Targeted Measurable Outcomes and Measures of Success

Program Activity	Measures of Success	
	Targeted, Measurable Outcome	Measure of Success
Program Administration		
SWMP Inventories	Task completion	Completion (Y/N)
Annual program review	Task completion	Completion (Y/N)
Facilitation Activities		
Staff training	TBD	% success
Education and Outreach	TBD	% success
Feedback & Verification		
Annual Certifications	Meet permit requirements	% success
Annual Inspections	Meet permit requirements	% success
Complaint Resolution	Resolve all justified complaints	% success
Compliance documentation and reporting	Document and report annually	% success

4.6 Program Review and Modification

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Table 4.6 identifies modifications made to the Development Planning Component since its March 24, 2008 submittal.

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Table 4.6 - Modifications to the Development Planning Component

Date	Section(s)	Modification(s)
05-20-08	Multiple	Various non-substantive corrections including: formatting, punctuation, and grammar; insertion of textual references to tables and figures; re-titling of figures and tables for consistency; insertion, re-numbering, and re-titling of headings for consistency; and corrections to figures and organizational charts.
05-20-08	4.6	Addition of Section 4.6 for tracking JURMP modifications.
06-30-10	4.2.4, 4.4.4	Modify the JURMP to (1) incorporate the implementation strategy figures contained in this JURMP Annual Report, (2) to add and explain specific targeted, measurable outcomes, and (3) to identify specific roles and responsibilities for meeting identified outcomes.
06-30-10	4.4.4.4.1	Modify JURMP discussion of Treatment Control BMP Inventory to reflect updated timeline for implementing program in KIVA.
06-30-10	4.4.4.4.1	Update the start of the wet season for consistency with <i>Watershed Protection Ordinance Section 67.802(y)</i> .
06-30-10	4.4.4.4.2	Modify discussion of Treatment Control BMP Prioritization.
06-30-10	4.4.4.4.3	Modify discussion of the Self-certification documentation to reflect changes to responsibilities for privately owned treatment control BMPs.
06-30-10	4.4.4.4.4	Modify discussion of compliance inspection for treatment control BMPs to incorporate changes to BMP prioritization.
06-30-10	4.4.4.4.4	Incorporate the reporting of high level of enforcement to RWQCB for treatment control BMP compliance.
06-30-10	Attachment 4.4	Add Self-verification documents to the attachments.