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Attachment 2.1 – SWMP Inventories

Attachment 2.2 – Educational and Notification Materials

Attachment 2.3 – Treatment Control BMP Inventory

Attachment 2.4 – Completed Annual Program Reviews

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2.0 DEVELOPMENT PLANNING COMPONENT

2.1 Introduction

JURMP Section 4.0 establishes a programmatic framework for conducting activities to minimize the impacts to receiving waters and other environmental resources from new land development and redevelopment in compliance with *Permit Section D.1*. This annual report section describes the programs and activities conducted by the County to implement its Development Planning Component during Fiscal Year (FY) 2011-12.

2.2 Land Use Planning and Environmental Review

2.2.1 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. *JURMP Section 4.2* describes how the General Plan provides effective water quality and watershed protection principles and policies that are consistent with the principles established in *Permit Section D.1.a*. The County's environmental review process for new development and redevelopment projects was initially described in its *JURMP Section 4.3*. **Figure 2.1** below also provides an overview of the major elements of this strategy as it was implemented during FY 2011-12. Additional documentation, analysis, and discussion are provided in **Error! Reference source not found.**

2.2.2 Source Characterization

JURMP Section 4.2.2 describes the potential pollutants of concern associated with land use types that are specified in the General Plan. The General Plan proposes to shift the pattern of development in unincorporated areas to encourage more efficient land use.

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2.2.3 Best Management Practice Requirements

One of the goals of the General Plan is to increase residential densities and commercial / industrial centers near existing infrastructure and developed areas (rural villages), and decrease densities east of the County Water Authority (CWA) boundary. The General Plan facilitates the preservation and conservation of larger tracts of open space lands, corridors, and agriculture, and promotes the use of compact, efficient development. The General Plan preserves and enhances water quality by reducing hardscape, including avoidance of longer tracts of roadways to outlying areas. It also preserves open space, allowing for greater and better stormwater treatment, infiltration, and groundwater recharge.

2.2.4 Program Implementation

The County's implementation and assessment strategy for reviewing the General Plan is described in *JURMP Section 4.2.4*. **Figure 2.1** also provides an overview of the major elements of this strategy as it was implemented during FY 2011-12. Activities related to updating the County's General Plan and environmental review processes are addressed concurrently in **Figure 2.1** because of their overlap, as well as similarities in their implementation strategies.

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General Plan and Environmental Review Activities			
Program Implementation	Target Audiences		Sources
 <ul style="list-style-type: none"> - DPLU Advance Planning - DPLU Project Planning - DPW Watershed Protection 	 <ul style="list-style-type: none"> - Community Planning & Sponsor Groups - Development Project Proponents 		 <ul style="list-style-type: none"> - Urban Development and Redevelopment
OUTCOME LEVEL 1	OUTCOME LEVEL 2	OUTCOME LEVEL 3	OUTCOME LEVEL 4
Stormwater Program Activities	Knowledge & Awareness	Behaviors	Source Reductions
<p><u>Program Administration</u> <input checked="" type="checkbox"/> Program reviews & updates</p> <p><u>Facilitation Activities</u> <input checked="" type="checkbox"/> Staff training <input checked="" type="checkbox"/> Education & outreach</p> <p><u>Feedback Activities</u> <input checked="" type="checkbox"/> Surveys & Tests</p>	<input checked="" type="checkbox"/> Not Targeted or Assessed	<input checked="" type="checkbox"/> Not Targeted or Assessed	<input checked="" type="checkbox"/> Not Targeted or Assessed
Figure 2.1 – FY 2011-12 Implementation and Assessment Strategy for Land Use Planning / Environmental Review Activities			

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2.3 Development Project Approval and Verification Process

2.3.1 Background

JURMP Section 4.4 describes the programs, activities, and strategies to be conducted for land development sources in the unincorporated areas of the County. During this reporting period, four departments implemented these activities: the Department of Planning and Land Use (DPLU), Department of Public Works (DPW), Department of General Services (DGS), and Department of Parks and Recreation (DPR).

2.3.2 Source Characterization

In accordance with *Permit Section D.1.c*, the County updated its inventories of land development projects subsequent to the completion of FY 2011-12. These updated inventories serve as a basis for the implementation of program activities during FY 2012-13. They are provided in their entirety in **Attachment 2.1** and are summarized by watershed and Stormwater Management Plan (SWMP) priority in **Table 2.1**. As described in *JURMP Section 4.4.4.1.2*, a Major SWMP is required for all Priority Development Projects, and a Minor SWMP for projects that do not meet the Priority Development Project criteria.

2.3.3 Best Management Practice Requirements

JURMP Section 4.4.3 and *Attachment 4.1* describe the County's post-construction BMP requirements for land development projects. These requirements were reviewed for necessary updates or modifications subsequent to the completion of FY 2011-12.

2.3.4 Program Implementation

The County's implementation and assessment strategy for conducting development project approvals and verifications is described in *JURMP Section 4.4.4*. **Figure 2.2** also provides an overview of the major elements of this strategy as it was implemented during FY 2011-12. **Table 2.2** presents level 1 results for FY 2011-12 and **Table 2.5** presents level 3 results. Both tables also include implementation targets for FY 2012-13. Additional documentation, analysis, and discussion are provided in **Table 2.3** and **Table 2.4**.

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Table 2.1 – Project Approvals by TTWQ Priority and Watershed

Department	Total Projects	Minor SWMP	Major SWMPs (SUSMP Projects)										
			Total Major SWMPs	Santa Margarita (902)	San Luis Rey (903)	Carlsbad (904)	San Dieguito (905)	Peñasquitos (906)	San Diego River (907)	Pueblo (908)	Sweetwater (909)	Otay (910)	Tijuana (911)
Private Land Development Projects	8	2	6	1	1	2	0	0	0	0	2	0	0
DPW-CIP	49	30	19	0	3	2	5	0	3	0	1	1	4
DPR-CIP	8	8	0	0	0	0	0	0	0	0	0	0	0
DGS-CIP	11	6	5	0	0	0	0	0	3	1	0	1	0
Total Project Approvals	76	46	30	1	4	4	5	0	6	1	3	2	4

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Project Approval and Verification Element			
Program Implementation 	Target Audiences 		Sources 
<ul style="list-style-type: none"> - DPLU Building Division - DPW Private Development & Construction Inspection - DPW, DPR, & DGS CIP - DPW Watershed Protection 	<ul style="list-style-type: none"> - Developers, Project Proponents - Contractors, Sub-contractors, Workers 		<ul style="list-style-type: none"> - Developed Parcels
OUTCOME LEVEL 1 Stormwater Program Activities	OUTCOME LEVEL 2 Knowledge & Awareness	OUTCOME LEVEL 3 Behaviors	OUTCOME LEVEL 4 Source Reductions
<p><u>Program Administration</u></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Program reviews & updates <input checked="" type="checkbox"/> Source inventory updates <p><u>Facilitation Activities</u></p> <ul style="list-style-type: none"> <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 <p><u>Feedback Activities</u></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Site inspections <p>(See Table 2.2 for Level 1 Results)</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Not Targeted or Assessed <input checked="" type="checkbox"/> Regulatory compliance <p style="text-align: center;">(See Table 2.5 for Level 3 Results)</p>		<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Not Targeted or Assessed

Figure 2.2 – FY 2011-12 Implementation and Assessment Strategy for the Project Approval and Verification Element

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**Table 2.2 – Program Implementation and Assessment Results for Project Approval and Verification
Element (Level 1 Outcomes)**

Outcome Level 1

FY 2011-12 Targets (T) ⊙	Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄	
Program Administration					
A variety of administrative activities are necessary to support the operation and management of this element of the County's stormwater program. These are described below.					
<input checked="" type="checkbox"/> Program reviews & updates Throughout each fiscal year, and during year-end program reviews, County staff provides a thorough review of all elements of its JURMP and ancillary program materials to determine whether modifications are necessary. See Table 2.6 for an updated list and schedule of modifications.					
Completion of identified program modifications The status of program modifications identified in last year's JURMP Annual Report is described below.					
2.2.1	Not targeted	R _I = None	No additional assessment currently needed	No targeted	No substantial modifications were identified during the review of the JURMP in FY 11-12.
2.2.2	Update Director's Letter of Intent (DLI) DLI-ES-W titled "Transferring Privately Constructed Treatment Control Best Management Practices to the Watershed Protection Program". (T = completion)	R _{I+A} = Complete		None identified	The effective date of DLI-ES-W was June 20, 2012. The purpose of this DLI is to define departmental roles and responsibilities to ensure proper construction, transfer and continued maintenance of permanent Treatment Control Best Management Practices (TCBMPs) installed at Priority Development Projects during the construction of Department of Public Works Private Land Development Projects.

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**Table 2.2 – Program Implementation and Assessment Results for Project Approval and Verification
Element (Level 1 Outcomes)**

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
2.2.3	Update Director's Letter of Intent (DLI) DLI-ES-G titled "Priority Development Projects – Planning, Construction, Transfer and Maintenance of Post-Construction Permanent Stormwater Treatment Control Best Management Practices." (T = completion)	R _{I+A} = Complete		None identified	The effective date of DLI-ES-G was June 1, 2012. The purpose of this DLI is to define departmental roles and responsibilities to ensure proper construction, transfer and continued maintenance of permanent Treatment Control Best Management Practices (TCBMPs) installed at Priority Development Projects during the construction of Department of Public Works Capital Improvement Program projects within County maintained road right-of-way, slope/drainage easements, Flood Control District easements, inactive landfills, wastewater treatment facilities, and airports.
2.2.4	Update the County of San Diego LID Handbook for consistency with the local SUSMP and final HMP.	R _{I+A} = N/A		None identified	This project is on hold pending the reissuance of the MS4 Permit. At that time the County will reevaluate the need to proceed with the handbook revisions.

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**Table 2.2 – Program Implementation and Assessment Results for Project Approval and Verification
Element (Level 1 Outcomes)**

Outcome Level 1

FY 2011-12 Targets (T) ⊙	Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
2.2.5	Update the local SUSMP with newly defined maintenance categories and other County specific SUSMP processes	R _{I+A} = Complete	Not targeted	<p>The County SUSMP and appendices were updated during FY 2011-12. The major updates to the SUSMP are as follows:</p> <ol style="list-style-type: none"> 1. Updated Attachment G of the Major Stormwater Management Plan with the updated “Treatment Control BMP Certification for DPW Permitted Land Development Projects” form and added a description in the SUSMP. 2. Expanded the Grandfathering language to define prior lawful approval and infeasibility. 3. Added an equation and description on how to calculate hydromodification and water quality using the sizing factor tables. 4. Clarified County specific hydromodification requirements in the SUSMP. 5. Exempted single family dwelling driveways from the Priority Development Project requirements. <p>The SUSMP is scheduled to be finalized in FY 2012-13.</p>
<u>Identification of additional needed program modifications</u>		An annual review of <i>JURMP Section 4.4.4</i> and other ancillary program documentation was completed over the course of FY 2011-12 and during the development of this JURMP Annual Report. Annual program reviews conducted by each implementing Department are included in Attachment 2.4 .		
<input checked="" type="checkbox"/> Source inventory updates (T = completion for all)		<i>JURMP Section 4.4.2</i> describes the priority activities addressed by the County’s development planning programs. These data are updated as needed. Results are described below.		
2.2.6	Update the Private Land Development SWMP inventory (T = completion)	R _{I+A} = Completed on 08-21-12	Update the Private Land Development SWMP inventory (T = completion)	All development projects must initiate a SWMP at project intake, and are tracked in KIVA. All projects going through the discretionary and ministerial processes are reviewed and initially allowed to proceed. DPLU-reviewed SWMPs are not initially listed in the County’s SWMP Inventory because they have not yet progressed to the permit issuance stage. Once permit processing is complete, and projects are ready for grading or construction, (i.e., a full planning and development review and construction plans have been approved by the County), SWMPs are reported to the WPP as applicable by each responsible department.

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**Table 2.2 – Program Implementation and Assessment Results for Project Approval and Verification
Element (Level 1 Outcomes)**

Outcome Level 1

FY 2011-12 Targets (T) ⊙	Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
2.2.7	Update the DPW-CIP SWMP inventory (T = completion)	R _{I+A} = Completed on 07-31-12	Update the DPW-CIP SWMP inventory	In accordance with <i>Permit Section D.1.c</i> , the County updated its Storm Water Management Plan (SWMP) inventories subsequent to the completion of FY 2011-12. DPW-Wastewater projects are included in the DPW-CIP inventory. Updated inventories are included in Attachment 2.1 .
2.2.8	Update the DPR-CIP SWMP inventory (T = completion)	R _{I+A} = Completed on 07-31-12	Update the DPR-CIP SWMP inventory	
2.2.9	Update the DGS-CIP SWMP inventory (T = completion)	R _{I+A} = Completed on 08-17-12	Update the DGS-CIP SWMP inventory	
2.2.10	Update the Treatment Control BMP Inventory (T = completion)	R _{I+A} = Completed on 07-01-12	Update the Treatment Control BMP Inventory	
<p>Facilitation Activities</p> <p>Facilitation activities are those which assist, encourage, or require changes in the knowledge or behaviors of the individuals and populations to which program activities are directed. Facilitation results for this element are described below.</p> <p>☑ Staff training <i>See Section 4.14</i></p>				

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**Table 2.2 – Program Implementation and Assessment Results for Project Approval and Verification
Element (Level 1 Outcomes)**

Outcome Level 1

FY 2011-12 Targets (T) ⊙	Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
2.2.11	Provide two trainings on updated HMP requirements (T = completion)	R _A = Complete, provided 4 presentations to stakeholders of the development community	Provide two trainings on updated HMP requirements	Watershed Protection Program staff provided the following trainings to a total of 32 staff: 01/20/2012: Provided an HMP training to 12 DPR staff. 05/24/2012: Provided a SDHM training to 10 DPW LD staff. 05/31/2012: Provided a SDHM training to 10 DPW CIP staff. On June 19, 2012 the Floodplain Management Association conducted a Hydromodification Screening Tool Workshop. Ten county employees attended this training.
<p>☑ Education & outreach</p> <p>Various outreach methods can be used to bring about changes in the knowledge or behaviors of project proponents. Outreach to this target audience is both embedded in the inspection process and conducted independently through other means. Results are described below.</p>				
<p><u>Notifications of project applicants</u></p> <p>Notification letters are a tool used to educate project proponents on changes to stormwater requirements and specific responsibilities associated the operation and maintenance of treatment control BMPs.</p>				
2.2.12	Notify the responsible party of treatment control BMP maintenance and operation obligations (T = completion)	R _I = Complete, responsible parties for 201 sites were notified.	Notify the responsible party of treatment control BMP maintenance and operation obligations	Educational materials on treatment control BMP self-certification were developed and distributed to each responsible party within the treatment control BMP inventory. These materials included directions, obligations, maintenance checklists, and a template self-certification form (for low and certain medium priority sites). Future efforts will be focused on completing the notifications during the project approval stage. Both Maintenance Agreements (Category 2) and Maintenance Notifications are registered on the property title now, so with any change in property ownership the owner is notified of their responsibility to maintain treatment control BMPs.

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Table 2.2 – Program Implementation and Assessment Results for Project Approval and Verification Element (Level 1 Outcomes)

Outcome Level 1

FY 2011-12 Targets (T) ⊙	Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
<p><u>Industry newsletters</u></p> <p>The Department of Public Works, Land Development Division distributes newsletters to approximately 141 stakeholders throughout the year. These newsletters are also posted on the County’s website (http://www.sdcounty.ca.gov/dpw/land/landnews.html).</p>				
2.2.13	Provide two program information and updates using DPW Land Development Newsletter (T = 2 updates)	R _I = Complete	R _A = Newsletters distributed	Provide two program information and updates using DPW Land Development Newsletter During FY 2011-12 three newsletters addressed stormwater issues. An estimated 279 people were reached by e-mail during FY 2011-12. These newsletters are included in Attachment 2.2 .
<p><u>County website operation</u></p> <p>Websites were operated throughout the fiscal year by the DPW (http://www.sdcounty.ca.gov/dpw/watersheds.html) and DPLU (http://www.sdcounty.ca.gov/dplu/bldgforms/index.html) to provide project applicants with information regarding their regulatory requirements and options for meeting them.</p>				
<p><u>Presentations, workshops, and trainings</u></p> <p>Presentations, workshops and trainings are provided to the target audience to educate them on new land development requirements, methodologies, and sharing of information.</p>				
<p><u>Pre-application meetings</u></p> <p>As described in <i>JURMP Section 4.4.4.1.1</i>, the County offers pre-application meetings to assist applicants who anticipate filing a discretionary land use permit application. 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.</p>				
<p><u>Combined outreach totals</u></p>				

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**Table 2.2 – Program Implementation and Assessment Results for Project Approval and Verification
Element (Level 1 Outcomes)**

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
2.2.14	Not targeted	R _I = 522 contacts made through mailings, presentations, workshops and pre-application meetings	Not assessed	Not targeted	Through all of the outreach activities summarized above, outreach on existing and updated land development requirements was provided to 522 people.
<p>☑ Project approval process <i>JURMP Section 4.4.4.1.2, a Major SWMP is required for all Priority Development (or SUSMP) Projects, and a Minor SWMP is required for projects that do not meet the priority project criteria.</i></p>					
<u>SWMP approvals</u>					
2.2.15	Not targeted	R _I = 30 Major SWMP (SUSMP) projects approved	Not assessed	Not targeted	The County initially approved 76 SWMP projects in FY 2011-12. These projects are approved to proceed through the process but are not yet ready for construction. The total number of approvals is 30 Major SWMPs and 46 Minor SWMPs as described in Table 2.2.
2.2.16	Not targeted	R _I = 46 Minor SWMP projects approved	Not assessed	Not targeted	Project approvals are not targeted since the County does not exercise control over the numbers of project applications submitted.

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Table 2.2 – Program Implementation and Assessment Results for Project Approval and Verification Element (Level 1 Outcomes)

Outcome Level 1

FY 2011-12 Targets (T) ⊙	Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄	
<u>Approvals of projects with low efficiency removal rankings</u> (T = confirmation)	(R _{I/A} = confirmation). As described in County <i>SUSMP Section 4.3</i> , projects may implement treatment control BMPs with low removal efficiency rankings when a feasibility analysis has been conducted and approved. No projects with low removal efficiency ranking were approved in FY 2011-12.				
<u>Approvals of waivers from implementing structural treatment control BMPs</u> (T = confirmation)	(R _{I/A} = confirmation). As described in <i>JURMP Section 4.4.3.5</i> , projects may be waived from the requirement of implementing structural treatment control BMPs as described in the <i>WPO (Section 67.812(g))</i> and <i>SUSMP Chapter 6</i> . No waivers from implementing structural treatment control BMPs were granted in FY 2011-12.				
<u>Requirement of final hydromodification controls</u> (T = confirmation)	(R _{I/A} = confirmation). Final HMP requirements went into effect in the unincorporated portions of the County for Priority Development Projects (PDPs) on January 8, 2011. The County had 16 projects approved for construction that were required to implement the final hydromodification control measures during FY 2011-12. All PDP's in processing are required to incorporate HMP into their SWMPs prior to final approvals (discretionary and grading and improvement permits). Twelve Priority Development Projects were exempt from implementing the final HMP criteria. These projects were still required to address water quality. See Table 2.5 for projects that an HMP was approved or an exemption granted based on final HMP criteria.				
☑ Enforcement / return to compliance					
2.2.17	Correct all instances of maintenance inspection non-compliance observed during inspections of sites (T = 31 instances)	R _I = 31 sites returned to or are on schedule to return to compliance	R _A = Complete	Correct all instances of non-compliance observed during inspections of sites.	Thirty-one sites were found to be non-compliant. Twenty-five sites returned to compliance following notification and 6 sites are on schedule to return to compliance.

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Table 2.2 – Program Implementation and Assessment Results for Project Approval and Verification Element (Level 1 Outcomes)

Outcome Level 1

FY 2011-12 Targets (T) ⊙	Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄	
<u>Reporting of high level enforcement</u> (T = confirmation)		(R _{IA} = confirmation). As required in <i>Permit Section B.5.(e)</i> , the County must report all instances of high level enforcement (administrative citation penalties) related to post-construction maintenance of treatment control BMPs to the RWQCB. No such instances occurred during FY 2011-12.			
<input checked="" type="checkbox"/> Maintenance agreements		As described in <i>JURMP Section 4.4.3.3</i> and further detailed in <i>SUSMP Chapter 5</i> , private development projects with treatment control BMPs meeting the Category 2 BMP requirements must enter into a BMP Maintenance Agreement with Easement and Covenant with the County. In general, Category 2 BMPs are considered medium priority, and are characterized by maintenance requirements for which the property owner has primary responsibility.			
2.2.18	Not targeted	R _I = 6 projects required Category 2 maintenance agreements	Not assessed	Not targeted	The treatment control maintenance tracking program accepted 6 projects that had Category 2 maintenance agreements in FY 2011-12.
<input checked="" type="checkbox"/> Annual maintenance certifications		<i>Permit Section D.1.e.(2)(d)</i> requires that the County receive annual verifications of the effective operation and maintenance of approved treatment control BMPs by responsible parties.			

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Table 2.2 – Program Implementation and Assessment Results for Project Approval and Verification Element (Level 1 Outcomes)

Outcome Level 1

FY 2011-12 Targets (T) ⊙	Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
2.2.19	Notify responsible parties of annual certification requirements (T =201)	R _{I+A} = Complete, 201 responsible parties notified	Notify responsible parties of annual certification requirements	<p>During FY 2011-12, the County notified responsible parties of their annual certification requirements and provided a maintenance checklist to ensure consistency in, and the adequacy of, certification. These notifications were conducted as follows:</p> <ul style="list-style-type: none"> • During inspections, 86 private site responsible parties were provided the template and informed of the requirement to keep maintenance records. 76 private site responsible parties received mailed cover letter and fact sheets(s) explaining the program and appropriate inspection templates; and • For the 39 County-maintained sites, the appropriate County departmental operations staff was notified by phone and e-mail messages as to the requirements.
<p><u>Feedback Activities</u> Feedback Activities are conducted to determine whether and to what degree targeted changes are occurring in targeted staff. The implementation of feedback activities for this element is described below. Results of feedback obtained are provided in Table 2.5.</p>				
<p>☑ Site inspections Site inspections are used to verify compliance and to determine whether additional actions are required to correct non-compliance. Site inspection results are described below.</p>				
<p><u>Treatment control BMP maintenance inspections</u> <i>Permit Section D.1.e.(1).c</i> prescribes minimum inspection frequencies for priority projects with treatment control BMPs during the wet and dry weather seasons. Site inspection results are provided below.</p>				

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**Table 2.2 – Program Implementation and Assessment Results for Project Approval and Verification
Element (Level 1 Outcomes)**

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ☒	Next Fiscal Year Targets ⊙	Explanation 📄
2.2.20	Inspect all high priority development sites with treatment control BMPs prior to the wet season (T=40 sites)	R _I = 40 sites inspected	R _A = Complete	Inspect all high priority development sites with treatment control BMPs prior to the wet season	There were 40 high priority sites on the inventory. All were inspected prior to the rainy season.
2.2.21	Inspect 50% of development sites with drainage insert treatment control BMPs (T=36 sites)	R _I = 48 sites inspected	R _A = Complete	Inspect 50% of development sites with drainage insert treatment control BMPs	73 sites were identified as having drainage inserts. During 2011-12, 48 sites were inspected, exceeding the target by 33%.
2.2.22	Inspect low priority development sites with treatment control BMPs as needed (T =34)	R _{I+A} = 34 sites inspected	R _A = Complete	Inspect low priority development sites with treatment control BMPs as needed	If no self-verification documentation was received from privately owned sites, the County deemed an inspection was needed. Thirty-four privately owned low priority sites did not provide self-verification documentation, so thirty-four inspections were conducted. Next year, the County will be increasing efforts to receive self verification documents so inspections can be focused on higher priority sites. Three separate mail-outs, along with follow up phone calls and e-mails will be conducted to get higher self verification percentages.

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**Table 2.2 – Program Implementation and Assessment Results for Project Approval and Verification
Element (Level 1 Outcomes)**

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ☒	Next Fiscal Year Targets ⊙	Explanation 📄
2.2.23	Inspect a minimum of 20% of all sites with treatment control BMPs (T = 40 sites)	R _I = 94 sites were inspected	R _A = Complete	Inspect a minimum of 20% of all projects with treatment control BMPs	94 of 201 sites were inspected, more than doubling the targeted amount.
<u>Quality control audit inspections</u>		DPW WPP staff conducts quality assurance (QA) inspections and audits of sample sites to ensure consistency in self-certification and inspection.			
2.2.24	Conduct quality control inspections of Category 1 and 2 treatment control BMP sites, as needed (T=55)	R _I =55 sites were inspected	R _A =Complete	Conduct quality control inspections of Category 1 and 2 sites, as needed	For private (Category 1 or 2) sites with low or medium priority treatment control BMPs, self-verification forms were mailed to the property owners. Of these properties, forms were not returned or properly completed for 55 sites. Consequently, QA inspections were conducted of these sites. Forty-two sites were compliant on the initial QA inspection. Four sites from the thirteen non-compliant sites are undergoing the appropriate regulatory actions to return to compliance; and nine sites have returned to compliance.
2.2.25	Conduct quality control inspections of 20% of Category 3 and 4 treatment control BMP sites (T= 8 sites)	R _I = 9 sites were inspected	R _A = Complete	Conduct quality control inspections on 20% of Category 3 and 4 treatment control BMP sites	Nine quality assurance inspections were conducted for Category 3 and 4 sites. One site failed, but has since come into compliance.

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Table 2.3 - Materials Distribution to the Construction and Development Industry

Date	Target Audience	Estimated Number	Description
October 2011	Professional Societies, Surveyors and Engineers	93	Land Development News article on: Hydromodification Management Plan Requirements
March 2012	Professional Societies, Surveyors and Engineers	93	Land Development News article on: Geomorphic Assessments
May 2012	Professional Societies, Surveyors and Engineers	93	Land Development News article on: Standard Urban Stormwater Mitigation Plan Update

Totals **279**

Table 2.4 – Approvals of Major and Minor SWMPs

Department/Section	Major SWMP	HMP Applied	HMP Exemptions (see attachment 2.1)	Minor SWMP
Private Land Development Projects	6	2	3	2
DPW CIP	19	13	6	30
DPR CIP	0	0	0	8
DGS CIP	5	1	3	6

Total Projects **30** **16** **12** **46**

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Table 2.5 – Assessment of Behavior in Development Project Proponents (Level 3 Outcomes)

Outcome Level 3

FY 29-10 Targets (T) ⊙	Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
☑ Compliance with BMP requirements	<p><i>Permit Section D.1.f</i> requires each priority development project subject to SUSMP requirements be inspected to verify that it has constructed LID, source control and treatment control BMPs in compliance with all specifications, plans, permits, and ordinances. As described in <i>JURMP Section 4.4.4.1.7</i>, verification that BMPs have been constructed in compliance with all specifications, plans and permits for all projects subject to either a Major or Minor SWMP occurs upon the completion of construction activities. Compliance with BMP requirements is a post-construction requirement and can be found in Section 3.</p>		
☑ Certification of post-construction treatment control BMP maintenance	<p>For privately owned low- or medium-priority sites not inspected, receipt of the annual self-certifications serves as a confirmation that responsible parties are meeting their ongoing maintenance responsibilities.</p> <p>The County is keeping records that adequately document and certify the operations and maintenance of the 39 County-owned treatment control BMPs.</p>		

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Table 2.5 – Assessment of Behavior in Development Project Proponents (Level 3 Outcomes)

Outcome Level 3

FY 29-10 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
2.5.1	<p>Provide verification of annual operation and maintenance for all County-maintained treatment control BMP sites (T = 39 sites)</p>	<p>R_I = 38 certifications received</p>	<p>R_A = 97% completion</p>	<p>Provide verification of annual operation and maintenance for all County-maintained treatment control BMP sites.</p> <p>One drainage insert was not inspected during FY 2011-12. The drainage insert was located at “Woodland Drive” was inspected on July 18, 2012. There were no previous records because the location was not added to the TC-BMP inventory when signed off, due to county personnel change. Additionally, Road Crews were unable to conduct inspections at the site due to ongoing construction access restrictions at the location.</p> <p>For FY 2012-13, the Woodland Drive TCBMP location will be maintained in the inventory, and will be inspected and maintained by County Roads Crews as required.</p>

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Table 2.5 – Assessment of Behavior in Development Project Proponents (Level 3 Outcomes)

Outcome Level 3

FY 29-10 Targets (T) ⊙	Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
<p>2.5.2</p> <p>Provide verification of annual operation and maintenance for all private low and medium priority treatment control BMP sites not inspected by County staff (T = 131 sites)</p>	<p>R_I = 76 certifications received and 55 inspections conducted to verify operations and maintenance for all inventoried sites. Total of 131 sites verified.</p>	<p>R_A = Complete</p>	<p>Although verification was completed prior to October 1st, County staff had to conduct 55 site inspections (42%) because self-verification letters were not received or contained questionable information.</p> <p>100% Verification will be targeted for FY 2012-13. Next year, the County will be increasing efforts to receive self verification documents by conducting three separate mail-outs, along with follow up phone calls and e-mails.</p>

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2.4 Program Review and Modification

In accordance with *Permit Section I.1.b*, the County has reviewed the results of its JURMP effectiveness assessment and other relevant information to identify modifications needed to maximize JURMP effectiveness and achieve compliance with Permit section A. **Table 2.6** identifies planned modifications and improvements to the JURMP Development Planning Component and estimated schedules for their completion.

Table 2.6 – Planned Modifications to the Development Planning Component

Target Date	JURMP Section(s)	Planned Modification(s)
A. JURMP Modifications		
N/A	N/A	Changes to the JURMP will be considered after the reissuance of the permit.
B. Ancillary Program Documentation		
6/30/13	N/A	