CITY OF SANTEE

JURISDICTIONAL URBAN RUNOFF MANAGEMENT PROGRAM

July 2, 2021

Table of Contents

Tables

Figures

Appendices

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
APN	Assessor's Parcel Number
ASBS	Areas of Special Biological Significance
BMP	Best Management Practice
CASQA	California Stormwater Quality Association
CFR	Code of Federal Regulations
CGP	NPDES General Construction Permit, Order No. 2012-0006-DWQ
CIP	Capital Improvement Project
City	City of San Diego
CLRP	Comprehensive Load Reduction Plan
Copermittees	18 municipalities in San Diego County, the County of San Diego, the San Diego County Regional Airport Authority, and the San Diego Unified Port District
CUPA	Certified Unified Program Agency
CWA	Federal Water Pollution Control Act (also known as the Clean Water Act, or CWA)
DBC&S	Division of Building/Construction and Safety
DEH	County of San Diego Department of Environmental Health
DDS	Department of Development Services
ESA	Environmentally sensitive area
EPA	Environmental Protection Agency
GIS	Geographic Information System
HMMP	Hazardous Materials Management Program
HHW	Household Hazardous Waste
HOA	Home Owners Association
HPWQC	Highest Priority Water Quality Condition
HSA	Hydrologic subarea

HVAC	Heating, ventilating, and air conditioning
IC/ID	Illicit connection and illicit discharge
IDDE	Illicit Discharge Detection and Elimination
IGP	NPDES Industrial General Permit, Order No. 2014-0057-DWQ
IPM	Integrated Pest Management
JRMP	Jurisdictional Runoff Management Program
JURMP	Jurisdictional Urban Runoff Management Program
LID	Low Impact Development
MEP	Maximum extent practicable
MS4	Municipal separate storm sewer system (storm water conveyance system)
Municipal Code	Santee Municipal Code
Municipal Permit or Permit	NPDES Municipal Permit, Order No. R9-2013-0001, as amended by Order No. R9-2015-0001
NAICS	North American Industrial Classification System
NOI	Notice of Intent
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
Outfall Monitoring Program	Transitional Dry Weather Major Outfall Discharge Monitoring Program
PDP	Priority Development Project
RMA	Residential Management Area
RSVP	City of San Diego Police Department's Reserved Senior Volunteer Program
RWQCB	Regional Water Quality Control Board, San Diego Region
SDP	Standard Development Project
SIC	Standard Industrial Classification
SMART	Storm Water Multiple Application and Report Tracking System
SOP	Standard Operating Procedures

SSO	Sanitary sewer overflow
Storm Water Ordinance	Santee Stormwater Management and Discharge Control Ordinance (Chapter 8.48)
SUSMP	Standard Urban Storm Water Mitigation Plan
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
TCBMP	Treatment Control Best Management Practice
TDS	Total Dissolved Solids
TMDL	Total Maximum Daily Load
TTWQ	Threat to water quality
USEPA	United States Environmental Protection Agency
WDID	Waste Discharge Identification
WMA	Watershed Management Area
WMAA	Watershed Management Area Analysis
WPCP	Water Pollution Control Plan
WQIP	Water Quality Improvement Plan
WQTR	Water Quality Technical Report

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Date
Name, Title	Phone No.

Executive Summary

On May 8, 2013, the Regional Water Quality Control Board, San Diego Region (RWQCB) adopted an updated National Pollutant Discharge Elimination System (NPDES) Municipal Permit, Order No. R9-2013-0001 (Municipal Permit or Permit). The 2013 Municipal Permit, as amended by Order No. R9-2015-0001, regulates discharges to storm drain systems within 18 municipalities in San Diego County, the County of San Diego, the San Diego County Regional Airport Authority, and the San Diego Unified Port District (collectively referred to as Copermittees or Municipalities). Order No. 2001-01, required each Copermittee, including the City of Santee (City), to develop a comprehensive Jurisdictional Urban Runoff Management Program (JURMP). The recently issued Municipal Permit has changed the name of the program to the Jurisdictional Runoff Management Program (JRMP), and has also changed the requirements for which items needs to be included in the JRMP document. The new Municipal Permit requires Copermittees, including the City, to make significant changes to their JRMPs to meet new Permit requirements.

The JRMP is the City of Santee's approach to improving water quality in rivers, bays, lakes, and the Pacific Ocean through reducing discharges of pollutants to the storm water conveyance system. The City's storm water conveyance system, like that of most other jurisdictions across the United States, conveys runoff from rain, irrigation runoff, natural groundwater seepage, and other sources of water directly to water bodies without treatment. To reduce pollutants in these discharges to water bodies, the City implements or requires its residents, businesses, municipal facilities, and land owners to implement a variety of measures commonly referred to as best management practices (BMPs). Some examples of BMPs include covering potential pollutant sources to prevent contact with rain, employing erosion reduction techniques at construction sites, adjusting sprinklers to eliminate over-irrigation, sweeping streets and parking lots, and building green infrastructure facilities such as bioretention planters along streets.

Major components of the JRMP include the implementation of BMPs requirements, water quality monitoring, educational outreach efforts, municipal maintenance procedures, inspection and enforcement programs, and water quality monitoring procedures. The various components of the City's updated JRMP are discussed below.

1 Introduction

The introduction includes a discussion of the general regulatory background leading up to the creation of this JRMP document and the general objectives of updating the JRMP document. City setting information, land use statistics, a map of the City's storm water conveyance system

and information about Environmentally Sensitive Areas (ESAs) within the City are included in this section.

2 Program Organization & Legal Authority

This section describes the City's legal authority to implement its stormwater program. It also identifies and describes the departments within the City that conduct and oversee runoff management activities. An organizational chart that illustrates the relationships between the various City departments is also included.

3 Illicit Discharge Detection and Elimination

Newly updated prohibitions of various non-stormwater discharges—that is, discharges of water that are not rain—and the City's approach to controlling such discharges are included in this section. These discharges can increase pollutant loads in the water that flows to the City's storm water conveyance system and eventually to receiving waters. The categories of prohibited non-stormwater discharges are identified, and the appropriate control measures the City has identified to reduce the discharge of pollutants from such non-stormwater discharges are discussed.

The processes by which illicit connections and illicit discharges (IC/IDs) are detected by the City are described in this section. This includes the receipt and recording of violation reports made by both the general public and City personnel regarding stormwater pollution and the Outfall Monitoring Program. The City's spill response and prevention methods are also described.

4 Development Planning

The development of urban areas has the potential to negatively impact the surrounding environment. The addition of impervious surfaces can alter the natural drainage patterns of the area, and development can facilitate the introduction of pollutants to the environment resulting from human activities. The City has incorporated water quality provisions into its General Plan and has developed a BMP Design Manual that establishes the specific post-construction BMP requirements for all development projects. This section also discusses revisions made to the treatment control BMP (TCBMP) verification process. Methods for maintaining a prioritized, watershed-based inventory of completed projects with TCBMPs and conducting associated maintenance inspections are also included in this section.

5 Construction Management

Information and regulations applicable to construction activities within the City and updates made to the City's watershed-based inventory of the construction sites within the City are described in this section. Construction site inspection frequencies and methods are presented. Specific requirements for the implementation of advanced treatment measures at sites that pose exceptional threats to water quality are also found in this section. The construction and grading

permit approval process and stormwater related contract specifications for Capital Improvement Projects are also discussed.

6 Industrial and Commercial Facilities

This section discusses how the City updates and maintains its watershed-based inventory of industrial and commercial facilities, including mobile businesses. The City continues to utilize the same prioritization procedure for industrial and commercial facilities based off the experience and knowledge gained through the inspections conducted during the previous permit cycle. The minimum BMPs for industrial and commercial facilities have been updated and are included in Appendix C of this JRMP document. This section also includes a discussion of facility inspection frequencies and procedures.

7 Municipal Facilities

This section discusses the City's municipal facilities and the process for maintaining its watershed-based inventory. The minimum BMPs for municipal facilities, including special events, have been updated and are included in Appendix C. This section also includes a discussion of inspection frequencies and procedures for municipal site inspections.

8 Municipal Infrastructure

The City's routine infrastructure maintenance and operations are presented in this section, which includes information on street sweeping frequencies, prioritization, and the associated BMPs. The City's efforts to control litter and sewage spills from entering the storm water conveyance system is also discussed. Landscape maintenance operations and BMPs are presented in this section.

9 Residential Management Areas

The residential inventory includes requirements based off the new Permit. This section also provides a description of the residential oversight program and the methods that City staff will use to implement the program. Minimum BMPs required to be implemented for residential areas and activities are included in Appendix C.

10 Public Participation and Education

Outreach efforts, specifically tailored to target communities and activities within the City, are discussed. The education programs and activities that the City uses to foster awareness and encourage behavioral changes relating to stormwater activities are presented in this section. Information regarding educational programs conducted by the City are discussed in detail in this section. Lastly, this section describes the mechanisms that are used to encourage public participation in the City's storm water program and the development of this updated JRMP document.

11 Fiscal Analysis

The means by which the City funds its JRMP-related activities including jurisdictional, watershed, and regional activities is discussed in this section. The fiscal analysis method used under the 2007 Municipal Permit is still used and described here. This section lists the different departments of the City that are included in the storm water budget and provides the methods of reporting the yearly fiscal analysis in the Annual Report.

12 Reporting

Each year the City will develop an annual report on the implementation of its JRMP. Collectively, the Copermittees within the San Diego River Watershed Management Area (WMA), as designated within the Permit, will submit a Water Quality Improvement Plan (WQIP) Annual Report. Transitional JRMP Annual Reports are required to be submitted to the RWQCB by October 31 of each year until the first WQIP Annual Report is required to be submitted (after the approval of the WQIP). After which, only WQIP Annual Reports will be submitted.

13 Conclusions and Recommendations

This section describes conclusions and recommendations that were drawn from updates made to the JRMP document.

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June 26, 2015

VIA U.S. MAIL

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

Re: Statement of Legal Authority in Compliance with San Diego Regional Water Quality Control Board Order No. R9-2013-0001

Dear Mr. Gibson:

The City of Santee ("City") hereby submits this statement in its capacity as a Co-Permittee in accordance with Provision E.1 of San Diego Regional Water Quality Control Board Order No. R9-2013-0001, National Pollution Discharge Elimination System ("NPDES") Permit and Waste Discharge Requirements for the Municipal Separate Storm Sewer Systems ("MS4") Draining the Watersheds Within the San Diego Region ("Permit").

STATEMENT OF LEGAL AUTHORITY

The undersigned attorney for the City does hereby state that the City has obtained adequate legal authority to comply with the legal requirements imposed on the City under the Permit, consistent with the requirements set forth in the regulations to the Clean Water Act, 40 CFR [Code of Federal Regulations] 122.26(d)(2)(i)(A-F), and to the extent permitted by State and Federal law and subject to the limitations on municipal action under the California and United States Constitutions. Subject to those limitations, this includes the authority to:

- Prohibit and eliminate all illicit discharges and illicit connections to its MS4 (Santee Municipal Code ("SMC"), § 13.42.060(A) [prohibition and requirement to eliminate].)

- Control the contribution of pollutants in discharges of runoff associated with industrial and construction activity to its MS4 and control the quality of runoff from industrial and construction sites, including industrial and construction sites which have coverage under the statewide General Permit for Discharges of Storm

Water Associated with Industrial Activities (Industrial General Permit) or General Permit for Discharges of Storm Water Associated with Construction Activities (Construction General Permit), as well as to those sites which do not. (SMC, §§ 13.42.095 [industrial], 13.42.090 [construction].)

- Control the discharge of spills, dumping, or disposal of materials other than storm water into its MS4. (SMC, §§ 13.42.060 [prohibition of discharge of pollutants and non-storm water], 13.42.120 [notification of spills].)

- Control through interagency agreements among Copermittees the contribution of pollutants from one portion of the MS4 to another portion of the MS4. (Gov. Code, §§ 37350, 37355 [authority to control city property by contract].)

- Control, by coordinating and cooperating with other owners of the MS4 such as Caltrans, the U.S. federal government, or sovereign Native American Tribes through interagency agreements, where possible, the contribution of pollutants from their portion of the MS4 to the portion of the MS4 within the Copermittee's jurisdiction. (Gov. Code, §§ 37350, 37355 [authority to control city property by contract].)

- Require compliance with conditions in its statutes, ordinances, permits, contracts or orders, or similar means to hold dischargers to its MS4 accountable for their contributions of pollutants and flows. (SMC, §§ 13.42.070 [discharge in violation of permit], 13.42.150 [violations constituting misdemeanors], 13.42.160 [penalties for violation], 13.42.170 [continuing violations], 13.42.200 [administrative enforcement powers].)

- Require the use of BMPs to prevent or reduce the discharge of pollutants in storm water from its MS4 to the MEP. (SMC, § 13.42.080 [BMPs required to reduce discharge of pollutants].)

- Require documentation on the effectiveness of BMPs implemented to prevent or reduce the discharge of pollutants in storm water from its MS4 to the MEP. (SMC, §§ 13.42.080 [requiring implementation and maintenance], 13.42.130 [requiring monitoring and documentation].)

- Utilize enforcement mechanisms to require compliance with its statutes, ordinances, permits, contracts, orders, or similar means. (SMC, §§ 13.42.150 [violations constituting misdemeanors], 13.42.160 [penalties for violation], 13.42.200 [administrative enforcement powers].)

- Carry out all inspections, surveillance, and monitoring procedures necessary to determine compliance and noncompliance with its statutes, ordinances, permits, contracts, orders, or similar means and with the requirements of this Order, including the prohibition of illicit discharges and connections to its MS4; the Copermittee must also have authority to enter, monitor, inspect, take measurements, review and copy records, and require regular reports from industrial facilities, including construction sites, discharging into its MS4. (SMC, §§ 13.42.100 [authorizing City to inspect] 13.42.130 [authorizing City to require testing, monitoring and reporting], 13.42.140 [authorizing City to enter and inspect].)

CONCLUSION

Thank you for your attention to this matter. Please do not hesitate to contact the undersigned if you have any questions or need any additional information.

Sincerely,

Rebecca Andrews

Rebecca Andrews
for BEST BEST & KRIEGER LLP

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Date
Name, Title	Phone No

1 Introduction

1.1 Background

In 2002, the City of Santee created its first Jurisdictional Urban Runoff Management Plan (JURMP). In 2008, the City of Santee updated its JURMP as required by the San Diego Regional Water Quality Control Board (RWQCB) Order No. R9-2007-0001 (Municipal Permit). On May 8, 2013, an updated Municipal Permit was adopted by the RWQCB, and went into effect on June 27, 2013. The 2013 Municipal Permit, as amended by Order No. R9-2015-0001, requires all San Diego County Copermittees (21 jurisdictions) to update their JURMPs and also changed the name of the storm water management program to "Jurisdictional Runoff Management Program" (JRMP). In early 2015, Orange County Copermittees were incorporated into this permit, and Riverside County will soon follow.

This JRMP document is a comprehensive plan that describes how the City of Santee will implement a suite of programs to help protect and improve the water quality of rivers, creeks, and the ocean. The City is dedicated to reducing storm water pollution for the protection of both human and environmental health, and also beneficial uses. Potentially harmful pollutants, such as bacteria, litter, pesticides, and fertilizers, can be transported from within the city to nearby receiving waters by way of the storm drain conveyance system. Human activities and actions can contribute pollutants to water runoff in both rainy and dry weather. The permit and this plan address pollutants that may be conveyed by rain water, wind, and/or outdoor water use through the storm drain system. The storm drain conveyance system within the City of Santee discharges both directly and indirectly to the San Diego River through the various creeks and channels such as Forester Creek and Sycamore Creek. These untreated discharges are then conveyed by the San Diego River westward to the Pacific Ocean, at Ocean Beach.

This revised JRMP document contains a description of the City's programs as a whole, and describes specific activities the City plans to implement or will require to be implemented to achieve compliance with the Municipal Permit. This document is based on the most updated information available at the time this document was prepared. Each year, the City will submit a JRMP Annual Report to the RWQCB, and any changes to the City's JRMP will be noted in that document. Any program modifications will be for the advancement of the City's program and will comply with all regulations as presented within the Municipal Permit.

1.2 Purpose and Objectives

The primary purpose of this document is to present strategies that the City will implement to reduce the discharge of pollutants from its MS4 to the maximum extent practicable (MEP) in

accordance with the strategies identified in the San Diego River Water Quality Improvement Plan (WQIP). To achieve this purpose, the City has and will continue to improve on existing programs and develop new program components intended to minimize or eliminate the effects of water runoff from the City to receiving water bodies.

1.3 City Setting

The City of Santee is located in east San Diego County, and is bordered by the City of San Diego to the north and west, the City of El Cajon to the south, and unincorporated community of Lakeside to the east. The City comprises approximately 17 square miles and has an estimated population of just over 55,000.

Land-use within the City is mainly residential; other land uses in the City include municipal facilities, industrial and commercial facilities, streets, highways, and undeveloped open spaces. Land-use categories with the corresponding acreage percentage of the total area are included in Table 1-1, and Figure 1-1 shows the distribution of land use areas throughout the City.

Table 1-1. City of Santee Land Use Breakdown

Single Family	**3,332 Acres**
Multi-Family	521 Acres
Commercial	270 Acres
Industrial	400 Acres
Park/Open Space	1,066 Acres
Public	548 Acres
Planned Development	2,661 Acres
Town Center	400 Acres
Total Acreage	**9,198 Acres**

Source: City of Santee Land Use Plan

1.3.1 Watersheds

The City of Santee lies entirely within the San Diego River Watershed, Hydrologic Unit (HU) 907. The City has several drainage basins within the City, all of which eventually terminate at the San Diego River. Specifically, the entire City of Santee is located within the Lower San Diego River Hydrologic Area (HA), 907.1. While a significant portion of the City drains directly to San Diego River (which flows from east to west across the City), some sections of the City drain first to other receiving water bodies within the City that then ultimately discharge into San Diego River. Forester Creek enters the City of Santee from the southeast, eventually merging with San Diego River west of Carlton Hills Boulevard. Sycamore Creek enters the City from the north,

flows south, eventually merging with the San Diego River west of Santee Recreation Lakes (Santee Lakes).

1.3.2 Storm Drain System

A map of the City's storm drain system is included in Appendix D of this JRMP document. The City has approximately 1,400 inlets within residential areas, 114 inlets within commercially zoned areas, and 210 inlets within industrial zoned areas.

1.3.3 Environmentally Sensitive Areas

Environmentally sensitive areas, as defined in the Municipal Permit, include but are not limited to the following:

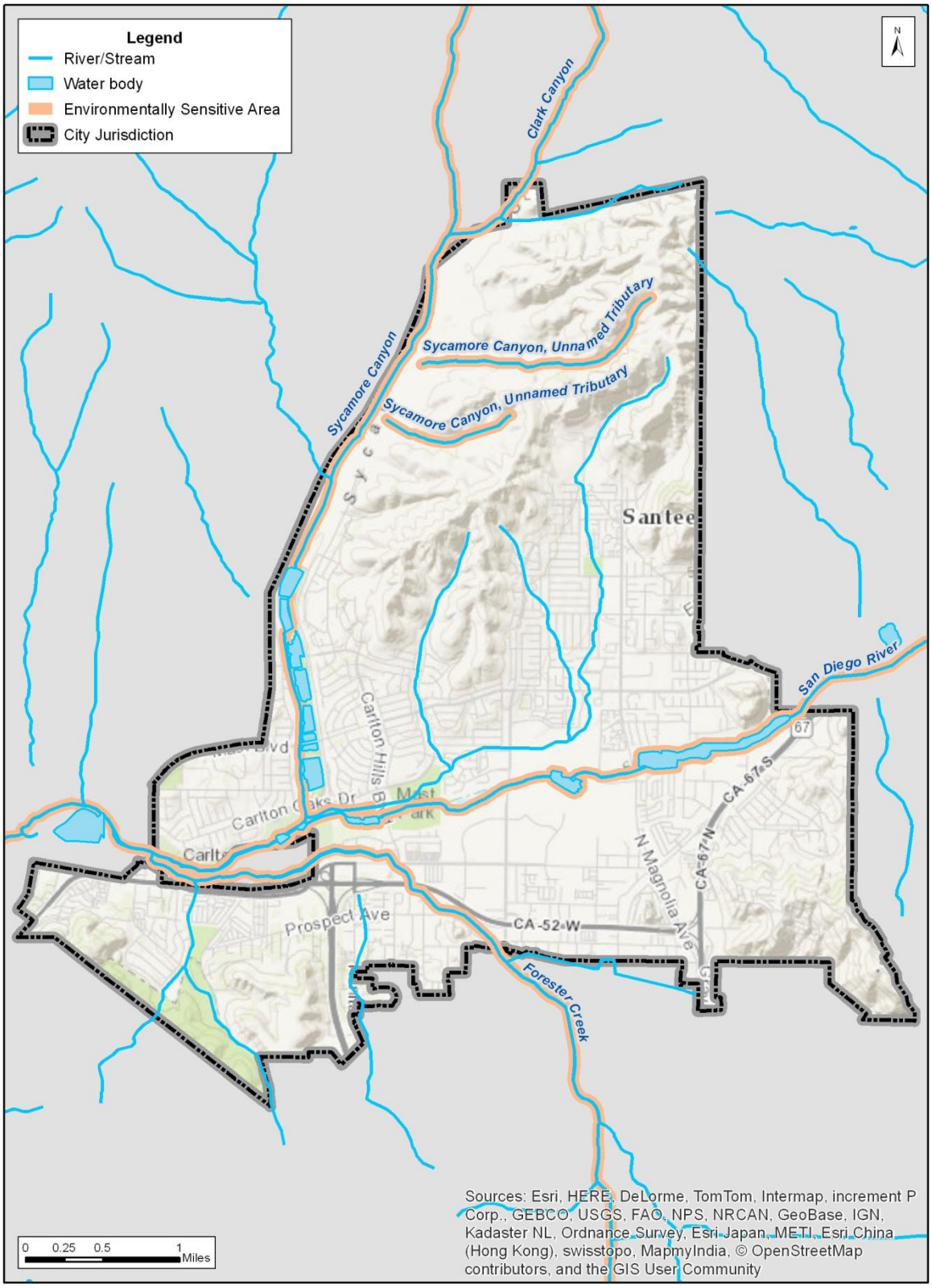
- Federal Water Pollution Control Act (also known as the Clean Water Act, or CWA) Section 303(d) List of Water Quality Limited Segments (303(d) listed)
- Areas designated as Areas of Special Biological Significance (ASBS) by the State Water Resources Control Board (SWRCB) and the San Diego RWQCB
- State Water Quality Protected Areas
- Water bodies designated with the RARE beneficial use by the SWRCB and the San Diego RWQCB
- Any other equivalent ESAs which have been identified by the Copermittees

Using the definitions above, it has been determined that the City of Santee contains the following ESAs:

- Clark Canyon
- Forester Creek
- San Diego River
- Sycamore Canyon
- Sycamore Canyon, Unnamed Tributary

Forester Creek is included on the 2010 303(d) list of impaired water bodies for fecal coliform, pH, selenium, and total dissolved solids. The lower six miles of the San Diego River is on the 2010 303(d) list for *Enterococcus* bacteria, fecal coliforms, low dissolved oxygen, manganese, nitrogen, phosphorus, total dissolved solids, and toxicity. All other water bodies listed above are designated as having a RARE beneficial use. A map depicting all ESAs within the City is included as Figure 1-2.

Figure 1-2. City of Santee Environmentally Sensitive Areas



1.4 Report Organization

Section 1 **Introduction**

The introduction includes a general regulatory background leading up to the creation of this JRMP document. Land use statistics, City information, and information about ESAs within the City are included in this section.

Section 2 **Program Organization and Legal Authority**

This section identifies and describes the departments within the City that conduct and oversee JRMP-related activities and presents the City's storm water program organization.

Section 3 **Illicit Discharge Detection and Elimination**

This section describes the processes by which illicit connections and illegal discharges (IC/IDs will be detected, investigated, and eliminated by the City. This section describes non-storm water discharge prohibitions and the City's approach to controlling such discharges.

Section 4 **Development Planning**

This section addresses how the City will reduce discharge of pollutants from development projects. Information regarding the City's General Plan, the City's newly updated BMP Design Manual and related implementation methods are also included.

Section 5 **Construction Management**

This section provides a description on the prioritization of the City's watershed-based inventory of construction sites within the City. Updates to the construction BMPs are also described. Other program implementation information, including construction and grading permit approval process, contract specifications, and inspection procedures, is also included in this section.

Section 6 **Industrial and Commercial Facilities**

This section provides a description on the prioritization of the City's watershed-based inventory of industrial and commercial facilities within the City, including mobile businesses known to operate in the City. This section describes the minimum BMPs that are required to be implemented at industrial and commercial facilities. This section also includes a discussion of facility inspection frequencies and procedures.

Section 7 Municipal Facilities

This section provides a description on the updated prioritization of the City's watershed-based inventory of municipal facilities. A description of pollution prevention methods and minimum BMPs to be implemented at specific municipal facilities and during specific municipal activities is included in this section. This section also includes a discussion of municipal inspection frequencies and procedures.

Section 8 Municipal Infrastructure

A description of MS4 and sanitary sewer maintenance, street sweeping, and landscape activities conducted by City staff and associated BMPs for each activity is included in this section.

Section 9 Residential Management Areas

The new requirements that have been incorporated into the residential inventory are included in this section. This section also provides a description of the newly updated residential oversight program and the oversight methods the City staff will use to implement the program.

Section 10 Public Education and Participation

This section describes the education programs and activities that will be used by the City including content, form, and frequency for each target community as described by the Municipal Permit. This section describes the mechanisms that will be used to encourage public participation in the City's JRMP.

Section 11 Fiscal Analysis

This section provides the methods of reporting the yearly fiscal analysis in the Annual Report. A description of the City's method of securing all necessary financial resources for the inclusion of all programs detailed in the JRMP is also included.

Section 12 Reporting

This section describes components of the City's JRMP that are required to be included in the Annual Report submission.

Section 13 Conclusions and Recommendations

This section describes conclusions and recommendations that were drawn from updates made to the JRMP document.

Section 14 References

Appendices

Appendix A Storm Water Ordinance

Includes letter from chief legal counsel certifying that the Copermittee has taken the necessary steps to obtain and maintain full legal authority to implement and enforce each of the requirements contained in 40 CFR 122.26(d)(2)(i)(A-F) and the Municipal Permit.

Appendix B Enforcement Response Plan

Describes the enforcement mechanisms the City will utilize in order to ensure the implementation of its JRMP.

Appendix C Guidelines for Surface Water Pollution Prevention

Provides the minimum BMPs for industrial, commercial, municipal, residential, and construction activities.

Appendix D Storm Water Conveyance System (MS4) Map

Appendix E Water Quality Improvement Plan Strategies

Appendix F Retrofit and Rehabilitation

2 Program Organization and Legal Authority

2.1 Introduction

As specified in Section E.1.a of the Municipal Permit, the City of Santee establishes, maintains, and enforces adequate legal authority within its jurisdiction to control pollutant discharges into and from its storm drain system. The City has established and updated local ordinances which have been incorporated into the City's Municipal Code, which provide legal authority for enforcing storm water requirements. The City also has litter and public nuisance sections of the municipal code which are not specific to storm water but may in some cases be used to support storm water program implementation. The City's Municipal Code sections can be accessed via the City's website. The major municipal code sections relating to storm water include the following:

- 13.38: Construction and Demolition Debris Recycling
- 13.40: Waste and Pollution of Water
- 13.42: Storm Water Management and Discharge Control
- 15.04: Building Code
- 15.58: Excavation and Grading
- 17.36: Landscape and Irrigation Regulations

Where violations of the Municipal Code or the Municipal Permit are observed, administrative and judicial procedures may be employed to enforce storm water requirements. This legal authority empowers the City to:

1. Prohibit, prevent, and eliminate all IC/IDs to the City's storm drain conveyance system.
2. Define what non-storm water discharges are prohibited.
3. Control the contribution of pollutants in discharges of runoff (storm water or non-storm water) to the MEP.
4. Regulate discharges from spills, dumping, and disposal of materials other than storm water into the storm drain system. Section 3 of this document provides more information on discharge prohibitions.
5. Control the contribution of pollutants to the City's storm water conveyance system through interagency agreements, coordination, and cooperation with other owners of the storm water conveyance system.

6. Require compliance with conditions in its statutes, ordinances, permits, contracts, order, or other similar means to hold dischargers accountable for their contributions of pollutants or flows. The City also has the authority to require the use of BMPs to prevent or reduce the discharge of pollutants in storm water from the MS4 to the MEP.
7. Necessitate documentation on the effectiveness of BMPs implemented to prevent or reduce the discharge of pollutants in storm water from its storm water conveyance system to the MEP.
8. Use various enforcement measures, as discussed in the City's Enforcement Response Plan (Appendix B), to require compliance with its statutes, ordinances, permits, contracts, order, or similar means.
9. Conduct all inspection, surveillance, and monitoring procedures necessary to determine compliance and noncompliance with its statutes, ordinances, permits, contracts, order, or similar means, which includes the authority to enter, monitor, inspect, take measurements, review and copy records, and require regular reports from industrial facilities and construction sites discharging to the storm water conveyance system.

The City's Storm Water Management and Discharge Control chapter of the municipal code also includes, by reference, the City's Guidelines for Surface Water Pollution Prevention which provide the minimum BMP requirements (Appendix C). The City's Guidelines for Surface Water Pollution Prevention incorporates the CASQA BMP specifications as minimum requirements, and is organized into the following categories: Construction, Municipal, Industrial, Commercial, and Residential.

2.2 Certification of Legal Authority

The City Attorney has prepared a letter certifying that the City of Santee has adequate legal authority to implement and enforce the requirements of Title 40 Code of Federal Regulations (CFR) Section 122.26(d)(2)(i)(A-F) and Order No. R9-2013-0001. This letter will be submitted with the first WQIP Annual Report.

2.3 Departmental Roles and Responsibilities

Personnel from various City departments are involved in the implementation of the City's Storm Water Program. A diagram of the City departments within the City can be found in the City of Santee Organizational Chart presented in Figure 2-1 at the end of this section. The following is a list of departments, divisions, and sections within the City of Santee that conduct or assist with water quality protection, and storm water related activities. Only those departmental responsibilities and activities directly related to compliance with the Municipal Permit are mentioned below.

Community Services Department

The Department of Community Services is comprised of the Recreation and Public Services Divisions. This department provides for the maintenance of the city's infrastructure, which includes roads, landscaped medians, the MS4, earthen channels and concrete channels, City parks, municipal offices, and landscape maintenance districts. The department is responsible for providing emergency response to sanitary sewer overflows and pollutant spills on public streets. City sponsored special events are also coordinated by the Community Services Department.

Department of Development Services

The Department of Development Services (DDS) is the lead department for ensuring that the City protects water quality to the MEP in all activities conducted within its jurisdiction. As such, department staff is also responsible for water quality (storm water) outreach and education, compliance and enforcement, planning, and regional coordination. The department also includes the Engineering and Planning Divisions. The Engineering Division is responsible for reviewing all development projects for compliance with the City's storm water design standards, grading, and construction requirements. Engineering staff are responsible for verifying that all permanent BMPs included on the site's plans are properly installed. The Engineering Division also designs and administers the construction of all city public improvement projects in compliance with the City's storm water requirements. The Planning Division is responsible for reviewing landscape plans for compliance with the Landscape and Irrigation section of the municipal code. Planning also helps to ensure that that project are issued appropriate conditions of approval which include low impact development requirements. Conditions for minimum storm water BMPs are also included for all temporary use and special event permits, and are reviewed and coordinated via the Planning Division.

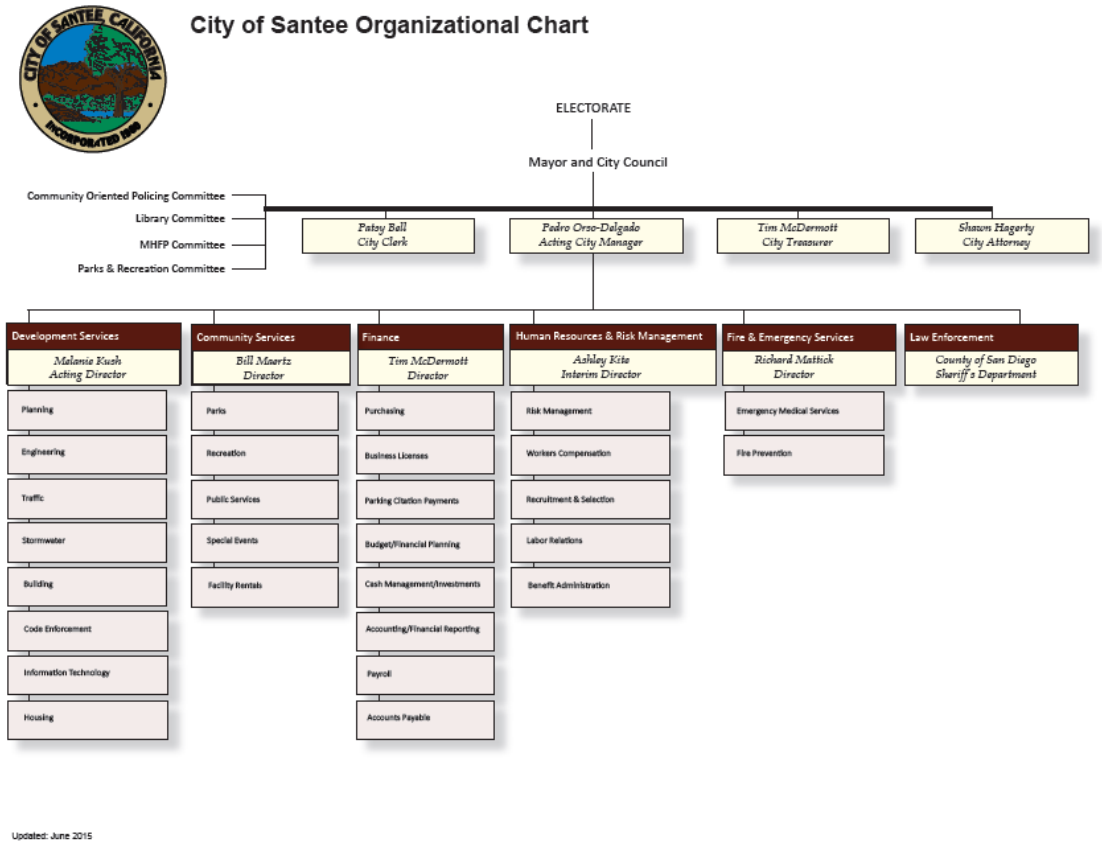
Finance Department

The Finance Department is responsible for collecting business license fees, a portion of which includes a storm water inspection fee. Finance staff assists with identifying new businesses that may require storm water inspection, and coordinate with DDS staff to ensure that the business inventory remains up to date. Finance also receives payment for all administrative citations.

City Attorney's Office

The City Attorney's Office reviews storm water related documents (such as manuals, forms, ordinances, etc.) developed by the City to ensure that they are in compliance with current laws and regulations. The City Attorney's Office also assists in the enforcement of the City's Municipal Code.

Figure 2-1. City of Santee Organizational Chart



3 Illicit Discharge Detection and Elimination

3.1 Introduction

One goal of the City's Storm Water Program is illicit discharge detection and elimination, which actively seeks and eliminates illicit connections and illicit discharges (IC/IDs) to the City's storm water conveyance system, which would otherwise discharge to receiving waters. Chapter 13.42 of the Santee Municipal Code, Storm Water Management and Discharge Control (Storm Water Ordinance) defines IC/IDs as follows:

- "Illicit connection" means any conveyance or drainage system through which a non-storm water discharge to the storm water conveyance system occurs or may occur and any connection to the storm water conveyance system that conveys an illicit discharge.

- "Illicit discharge" means any discharge to the storm water conveyance system that is not composed entirely of storm water except discharges pursuant to a NPDES permit as specified in Section 13.42.060(C) of the Storm Water Ordinance.

Illicit discharge detection and elimination efforts involves coordination between multiple City departments, including the City's Storm Water Program, Fire Department, Community Services Department, and Development Services Department, as well as external agencies such as the County of San Diego Department of Environmental Health (DEH) and Padre Dam Municipal Water District (PDMWD), and members of the public.

In support of City's illicit discharge detection and elimination efforts, the City has implemented many activities as outlined in this JRMP which facilitate the detection of IC/IDs. Examples of these activities include:

- City of Santee municipal staff "Eyes and Ears",
- Complaint investigation and response,
- Dry Weather, Major Outfall Discharge Monitoring Program (MS4 Outfall Monitoring Program) (Section 3.3.3),
- City online comment/complaint system, available for reporting any water quality concern (Section 3.3.1),
- Existing development inspections (Sections 6, 7, and 9),
- Construction site inspections,
- Routine storm water conveyance system inspection and maintenance (Section 8), and
- Education and public participation (Section 10).

The City investigates, inspects, and follows-up on non-storm water discharges that are reported or detected to identify the source(s) of the discharge. Voluntary compliance and escalating enforcement mechanisms are implemented to eliminate IC/IDs once the source has been identified. Education is provided to the responsible party to prevent future IC/IDs, where feasible. This section discusses prohibited discharges, non-storm water discharge exemptions (allowable discharges), and an overview of the City's procedures for IC/ID detection, prevention, response, and enforcement.

3.2 Non-Storm Water Discharges

Non-storm water discharges to the storm water conveyance system are prohibited unless the discharge has been authorized by a separate NPDES permit or are conditionally allowed by the Municipal Permit. Some categories of non-storm water discharges are allowed on the condition that they are addressed in accordance with the requirements of the Municipal Code and the Municipal Permit and are discussed Section 3.2.2.

The City will periodically review and evaluate conditionally allowed discharges to determine whether specified categories may or may not be significant sources of pollutants to receiving waters. In certain cases, the City will prohibit the discharge category from entering the storm water conveyance system. Where a category of non-storm water discharge is determined to be a significant source of pollutants, the City will take appropriate enforcement measures, as discussed in the City's Enforcement Response Plan (Appendix B) and prohibit the discharge category from entering the storm water conveyance system or implement BMPs (see the City's Guidelines for Surface Water Pollution Prevention in Appendix C).

3.2.1 Prohibited Discharges

A few significant changes occurred to the City's Storm Water Program as a result of the 2013 Municipal Permit (as amended by Order No. R9-2015-0001) and the compliance targets that were set within the San Diego River Water Quality Improvement Plan. The list of prohibited discharges has grown to include irrigation runoff or wash water runoff that enters the City's storm water conveyance system. Irrigation runoff includes overspray to paved and/or non-targeted surfaces, and over watering from either sprinkler or water hose use. Wash water includes runoff resulting from pavement washing, building washing, or vehicle/equipment washing.

The following discharges will be addressed as a prohibited discharge (illicit discharge) unless otherwise covered by NPDES Permit No. CAG919002 RWQCB Order No. R9-2008-002 or subsequent order *(General Waste Discharge Requirements for Discharges From Groundwater Extraction and Similar Discharges to Surface Waters within the San Diego Region Except for San Diego Bay (WDR))*, NPDES Permit No. CAG679001 RWQCB Order No. R9-2010-0003 or subsequent

order *(General Waste Discharge Requirements for Discharges of Hydrostatic Test Water and Potable Water to Surface Waters and Storm Drains or Other Conveyance Systems within the San Diego Region)*, or another NPDES permit as appropriate:

- Uncontaminated pumped ground water
- Discharges from foundation drains and footing drains, if the system is designed to be located at or below the groundwater table to actively or passively extract groundwater during any part of the year
- Water from crawl space pumps
- Water from water line flushing and water main breaks
- Discharges from recycled or reclaimed water lines
- Discharges from potable water sources
- Air conditioning condensation runoff
- Vehicle or equipment wash water
- Building or pavement wash water
- Swimming pool discharges
- Fire sprinkler system maintenance/flushing

Per Section E.2.d.(3)(e) of the Municipal Permit, if the City is unable to identify and document the source of a recurring non-storm water discharge to or from the storm water conveyance system, the City will address the discharge as an illicit discharge and update the JRMP as needed to address the common and suspected sources of non-storm water discharges.

3.2.2 Conditionally Allowed Discharges

The following discharges are allowable discharges unless the City or the RWQCB identifies the discharge as a source of pollutants to receiving waters:

- Diverted stream flows (diversion must be previously approved),
- Rising ground waters,
- Uncontaminated ground water infiltration,
- Springs,
- Flows from riparian habitats and wetlands,
- Discharges from foundation or footing drains if the system is designed to be located above the groundwater table at all times of the year and the system is only expected to discharge non-storm water only under unusual circumstances, and

- Emergency firefighting discharges

Table 3-2 at the end of this section summarizes appropriate disposal methods for the discharges listed above and other common types of discharges. Discharges determined by City staff to be necessary to protect public health and safety are exempt from all discharge prohibitions, provided that any conditions that may be set forth are satisfied. In emergency circumstances, the determination that a discharge is necessary may initially be oral but must be promptly confirmed in writing by the City. In non-emergency situations, a prior written determination by the City is required to exempt a discharge.

3.2.3 Firefighting Discharges

In accordance with Section E.2.a.(5) of the Municipal Permit, non-storm water discharged to the storm water conveyance system as a result of firefighting activities, both emergency and non-emergency activities, will only be considered an illicit discharge if the City or the RWQCB identifies the discharge as a significant source of pollutants to receiving waters.

Non-emergency firefighting discharges (i.e., discharges from controlled or practice blazes, firefighting training, and maintenance activities not associated with building fire suppression systems) are subject to the municipal BMPs described in Appendix C to reduce or eliminate pollutants in such discharges from entering the storm water conveyance system.

During emergency situations, priority of efforts is directed toward life, property, and the environment (in descending order). The BMPs listed in Appendix C may be implemented so long as they do not interfere with immediate emergency response operations or impact public health and safety.

3.3 Preventing, Detecting, and Responding to Illicit Connections and Illicit Discharges

3.3.1 Public Reporting of Illicit Connections (IC) and Illicit Discharges (ID)

To facilitate the process of reporting and investigating illicit discharges, the City encourages the public, City, and contract staff to report IC/IDs. Water quality or storm water-related questions and complaints will be responded to by appropriate City staff:

City of Santee Online Complaint Reporting

www.cityofsanteeca.gov , select 'Contact Us' (bottom of home page) or www.SanteeH2o.org

City's general email: Santee@cityofsanteeca.gov

Alternatively, complaints may be reported to the San Diego County Regional Storm Water Hotline at (888) 846-0800 or watersheds@sdcounty.ca.gov. The hotline is answered Monday through Friday, 8:00 a.m. - 5:00 p.m. and provides a voice mail message for 24-hour public

access in both English and Spanish. The City records all storm water / water quality related complaints on an Excel spreadsheet.

The City validates, investigates, inspects, and appropriately follows-up on IC/IDs that are reported or detected, to identify the source(s) of the discharge. Incidents which are likely to pose a serious threat to human health or the environment, are referred to the RWQCB in accordance with Section 1.l.(6) of Attachment B of the Municipal Permit, and/or to the County DEH, or 911. All other incidents are prioritized as follows: 1) incident has potential to harm human health, 2) incident has potential to threaten environmental health, 3) other. The criteria listed below are used to evaluate the risk and level of response:

- Type of pollutants discharged: toxic/caustic/flammable
- Estimated volume of discharge
- Proximity of storm drain inlet and proximity to outfall
- Proximity to impaired waterway or environmentally sensitive area
- Proximity of site to public water supply (well head, monitoring wells)

See Section 3.3.4 and Appendix G for more information regarding IC/ID investigations. The City will use its enforcement authority as necessary to eliminate IC/IDs as summarized in Section 3.5 and discussed in the Enforcement Response Plan (Appendix B).

3.3.2 Spill Prevention, Response, and Reporting

The City coordinates with various spill response agencies to prevent contamination of surface water, ground water, and soil to the MEP. The City will also coordinate with upstream and downstream Copermittees and/or agencies to prevent spills and illicit discharges into or from the City's conveyance system. Voluntary compliance and escalating enforcement mechanisms are implemented to immediately eliminate an IC/ID.

3.3.2.1 Sewage Spill Response

Sanitary sewer system spills may be discovered during City maintenance activities or observed and reported to the City by citizens and/or Padre Dam Municipal Water District (PDMWD). The City will take every action possible to ensure the responsible party promptly responds to the spill (contain, clean surfaces, remove and properly dispose) and,

Depending on the nature of the spill, the City of Santee, the County DEH, and/or PDMWD take action to control, contain, and clean up the discharged materials, as summarized in Table 3-1. PDMWD is responsible for the maintenance and operation of the City's sanitary sewer system. Any sewage spill in Santee that reaches the City's storm water conveyance system and/or a waterway is reported to the City by PDMWD.

Table 3-1. Responsible Party for Sewage Spill Response

Source	Responsible Agency
Any spill reaching a waterway	County DEH
Any spill reaching the storm water conveyance system	City of Santee Public Services Division and PDMWD
Leaks and spills from publicly owned collection system	PDMWD
Private residence (spills resulting from blockages of private laterals)	Property Owner and City of Santee Public Services Division
Private residence (spills resulting from failing septic systems)	Property Owner and County DEH

The County's Hazardous Materials Incident Response Team (HIRT) handles all sewage spill reports/complaints received after normal business hours. The City contributes to the funding of the HIRT which was founded in 1981 by the Unified Disaster Council and is funded by a Joint Powers Agreement and services all unincorporated San Diego County areas, 18 municipalities, two military bases, and five Indian Reservations.

It is the responsibility of the property owner to address sewage spills that result from a private sewer lateral or septic system failure. If the property owner or responsible party does not adequately contain, clean up, and make repairs in a timely manner, then the City will implement all necessary measures, and the responsible party will be billed. Code Compliance staff will also take enforcement action as described in the Enforcement Response Plan.

The City will collaborate with PDMWD and the County DEH, as needed, to ensure spills are fully remediated. Corrective actions will include:

- Interception and rerouting of sewage flows around the sewage line failure
- Vactor truck recovery of all debris, sewage materials, and any wash water
- Adequately clean all surfaces exposed to the sewage spill
- Use of portable aerators when the sewage spill cannot be entirely contained, and when severe oxygen depletion in existing surface waters is likely to occur
- Timely repairs

3.3.2.2 Hazardous Materials Spill Response

The City's Fire Department responds directly to spills or dumping of hazardous materials, and provides support services to other agencies that encounter hazardous materials in their routine duties. The Fire Department operates 24 hours a day, seven days a week. The team's duties include, but are not limited to, directing the containment and clean-up of spills that may enter

surface waters or storm water conveyance system in accordance with the County's Hazardous Waste Management Plan.

The County's HIRT responds jointly with the San Diego Fire & Life Safety Services Department, Hazardous Incident Response Team to investigate and mitigate all chemical-related spills and emergencies. Emergency response activities include mitigation, containment and control, hazard identification, and evaluating the threat to the public and the environment. The HIRT is also responsible for handling all complaints received after normal business hours for the County's DEH.

3.3.2.3 Other Spill Prevention and Mitigation Procedures

The City coordinates spill prevention, containment, and response activities throughout all appropriate departments, programs, and agencies so that maximum water quality protection is available at all times. Spills are prevented and mitigated through the implementation and enforcement of minimum BMPs (Appendix C).

3.3.2.4 Spill/Discharge Reporting

Illicit discharges to the City's storm water conveyance system are reported annually in the City's JRMP Annual Report, which includes the number of discharges reported, detected, investigated, identified, and eliminated, and the number of associated enforcement actions. The following information provides an overview of the agencies and additional reporting requirements for reporting spills and discharges. All life threatening emergencies are routed through 9-1-1.

County of San Diego Department of Environmental Health

California Health and Safety Code Section 5411.5 requires that any sewage or other waste (including hazardous waste) discharged to, or will probably discharge to, surface waters are reported to the County of San Diego DEH immediately, 24 hours a day. Surface waters include rivers, creeks, streams, ephemeral streams, lagoons, the ocean, dry arroyos, and storm water conveyance systems. During standard work hours (Monday through Friday, 7:30 a.m. to 4:30 p.m.), reports should be called in to (858) 505-6880.

Certified Unified Program Agency

The County DEH, Hazardous Materials Division, was certified by the California EPA as the Certified Unified Program Agency (CUPA) for San Diego County in 1996. The unified program is the consolidation of six state environmental programs into one program under the authority of a CUPA. If a hazardous spill is observed and it does not result in an emergency situation, City personnel, business and construction site operators, or other members of the public should call (858) 505-6657. For assistance with specific reporting requirements, spill reporters can use the reporting assistance tools on the County's website (www.sdcounty.ca.gov).

Regional Water Quality Control Board

As required by the Municipal Permit, the City will provide verbal notification to the RWQCB of all instances of non-compliance within its jurisdiction that may pose a threat to human or environmental health within 24 hours from when the City is made aware of the situation. Verbal notification will be followed up by a written report to the RWQCB within five days of the incidence of noncompliance. The RWQCB may waive the written report requirement on a case-by-case basis if a report was received within 24 hours. The specific information that must be reported within 24 hours of the incidence of noncompliance can be found in Section 1.l.(6) of Attachment B of the Municipal Permit.

The written reports of non-compliance determined to pose a threat to human or environmental health shall include the following information:

- A description of the non-compliance
- Cause of non-compliance
- Period of non-compliance (including exact dates and times)

If non-compliance has not been corrected, the report must also include:

- The anticipated time it is expected to continue
- A description of steps taken or planned to reduce, eliminate, and prevent reoccurrence of the non-compliance

Order R9-2007-0005 requires that dischargers report to the RWQCB all sewage spills to surface water, drainage channels tributary to surface water, or to the STORM WATER CONEYANCE SYSTEM and are not fully captured, within 24 hours by email (RB9SSO@waterboards.ca.gov) or fax at (858) 571-6972 or telephone at (858) 637-5581, or for after hours, (858) 822-8344. Private lateral sewage spills that equal or exceed 1,000 gallons and/or result in a discharge to a drainage channel or surface water, or discharge to a storm drain that was not fully captured will also be reported in the same manner.

State Water Resources Control Board

PDMWD reports all sewer spills online using the California Integrated Water Quality Management System (CIWQS) database within 24 hours, as required by SWRCB Order No. 2006-003-DWQ.

California Office of Emergency Services

California Water Code Section 13271 and the California Code of Regulations Section 2250 require that the California Office of Emergency Services (OES) be notified immediately after becoming aware of, and at least within two hours, any significant hazardous material spill or any sewage spills that are 1,000 gallons or more, that have discharged to, or will probably

discharge to, surface water. Notifications can be made by calling (800) 852-7550 and by fax at (916) 262-1677 (follow-up only). Written follow up reports are required within seven calendar days if the spill equals or exceeds the Federal Reporting Quantities.

National Response Center

The National Response Center will also be notified at (800) 424-8802 if a significant hazardous spill occurs or if the spill meets the criteria listed on the OES website (www.calema.ca.gov). A written follow-up report will also be submitted as soon as possible after the incident. The Code of Federal Regulations List of Hazardous Substances and Reportable Quantities should be used to determine if a substance is considered to be hazardous or to determine what constitutes a "significant" spill.

3.3.3 Dry Weather, Major MS4 Outfall Discharge Monitoring

In 2013, the City of Santee began routine visual monitoring of discharges from major outfalls during dry weather to detect non-storm water and IC/IDs from its storm water conveyance system. A "major outfall" is defined as an outfall that is at least 36 inches in diameter or drains an industrial area and is at least 12 inches in diameter and discharges to a receiving water body.

Under the 2007 Municipal Permit, the City conducted field screening at all monitoring sites and tested any water present at the sites for various common storm water pollutants. The 2013 Municipal Permit emphasizes the identification and elimination of dry weather discharges from the City's outfalls instead of on pollutants in discharges. By working towards eliminating or reducing dry weather flows, the City of Santee is able to concentrate on reducing and eliminating a wide range of pollutants that may be transported to receiving waters.

The City has implemented procedures to investigate and inspect segments of its storm water conveyance system that have a reasonable potential of receiving, containing, or discharging pollutants due to IC/IDs or other non-storm water sources. All IC/IDs found during field work are promptly investigated and appropriate follow-up and/or enforcement actions are taken as necessary. Additional information regarding dry weather, major outfall monitoring procedures, IC/ID investigations, and prioritization of investigations are included in Appendix G.

Note that other monitoring requirements specified in the Municipal Permit include wet weather outfall and receiving water monitoring. Those activities are completed by contractors through watershed level programs for which cost is shared among the responsible parties in the watershed. For that reason, the details of those programs are not discussed in this section.

3.3.3.1 Storm Water Conveyance System Map

As part of the City's JRMP and major outfall monitoring program, the City has updated and continues to maintain a map of the storm water conveyance system (included in Appendix D) which shows the City's major outfalls and provides the following information:

- All MS4 segments owned, operated, and maintained by the City, and that includes outfall monitoring locations and drainage basins
- All known locations of inlets that discharge and/or collect runoff into the City's storm water conveyance system
- All known locations of connections with other MS4s not owned or operated by the City (e.g. Caltrans MS4s)
- All known locations of outfalls and private outfalls that discharge runoff collected from areas within the City's jurisdiction
- All segments of receiving waters within the City's jurisdiction that receive and convey runoff discharged from the City's outfalls
- Locations of the inventoried major outfalls within the City's jurisdiction, pursuant to Section D.2.a.(1) of the Permit
- Locations of the non-storm water persistent flow outfall monitoring sites, identified pursuant to Section D.2.a.(1) of the Permit

The status of major outfalls as having persistent flow, transient flow, or being dry will change in the future as the City collects more data from outfall monitoring and as sources of flow are eliminated. For similar reasons, the sites at which persistent flow analytical monitoring is completed will likely change over time. Updates will be provided through the WQIP annual reporting process.

In accordance with Section E.2 of the Municipal Permit, each watershed within the City's jurisdiction contains at least one monitoring site. If field staff note inaccuracies in the map during field screening, the inaccuracies will be reported to the appropriate City staff so that updates to the GIS data can be made. The need for updates to the map will be assessed at least annually, and updates will be made where necessary. The GIS files used in developing the City's storm water conveyance system (MS4) map are available to RWQCB staff upon request.

3.3.4 Investigating Illicit Connections and Illicit Discharges

In addition to the investigation procedures described in the dry weather outfall monitoring procedures (Appendix G), the City may also employ the following methods in order to identify the source of an IC/ID:

Review of Plans

As-built drawings for the area of concern may be obtained to verify connections. However, an illicit connection is likely to have occurred after the as-built drawings were created, so additional investigative methods will also be employed.

Dye Testing

Dye testing is useful to confirm hydraulic connections between the potential source and the location downstream. Fluorescent dye is discharged at the source of the potential IC/ID and is monitored downstream.

Smoke Testing

Smoke testing can be used only on underground conveyance facilities, to determine potential hydraulic connections between the source and downstream location.

Video Monitoring

Mobile video cameras may be used to record observations of an underground pipe to determine whether it is connected to a storm water conveyance system.

Confined Space Entry

In some cases, underground conveyances are large enough that a crew trained in confined space entry may investigate the section of pipe or culvert in question instead of using video monitoring. All applicable health and safety regulations will be followed.

Potential Sewage IC/IDs

Further testing of suspected sewage-related flows is conducted when visual and odor observations do not adequately confirm the presence of sewage.

- Ammonia - Sewage frequently contains ammonia levels of 30 mg/L or greater. Typically, this can be measured with an inexpensive field screening kit.
- Bacteria - Sewage generally has high levels of total and fecal coliforms and *Enterococci*. Sewage treatment plants and many laboratories routinely conduct these indicator analyses.

3.4 Eliminating Illicit Connections and Illicit Discharges

Action is taken to eliminate IC/IDs and their sources as soon as possible after detection. IC/IDs that pose a serious threat to public health or the environment are eliminated immediately. Action may include the referral to the appropriate City department or other agency for abatement. IC/IDs that do not pose serious threats to public health or the environment are eliminated through an escalating series of enforcement actions, which are described in the Enforcement Response Plan (Appendix B).

When a discharge originates from a source outside the City's jurisdiction, and the City does not have legal authority to require that the discharge be eliminated. The City will notify the responsible agency with jurisdiction over the source of the discharge so that that agency can take action to eliminate the discharge. In the event that the responsible agency is not responsive

or otherwise does not eliminate the discharge in a timely manner, the City will implement BMPs to minimize the impact of the discharge and notify the RWQCB.

If a responsible party has been identified during an IC/ID discharge investigation, the responsible party is required to take appropriate action to eliminate the IC/ID and to perform any necessary clean-up or remediation in accordance with the City's Guidelines for Surface Water Pollution Prevention (Appendix C). Should a responsible party fail to perform necessary actions to eliminate the IC/ID in a timely manner, the procedures outlined within the City's Enforcement Response Plan will be implemented. Depending on the type and location of the discharge, the City may take immediate action to abate the discharge, and subsequently bill the responsible party for the abatement costs.

Remedial actions that may be taken to eliminate illicit discharges include the following:

- Redirect non-hazardous discharges to the sanitary sewer, collection container, or onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property
- Redirect hazardous discharges to a collection container for reuse or disposal via a licensed hazardous waste disposal service

The City takes appropriate action to ensure that any IC/IDs are disconnected from the storm water conveyance system, or otherwise blocked or diverted away from the storm water conveyance system or receiving waters. Examples of appropriate actions may include the following:

- Plug sinks and drains that are discharging pollutants to the storm water conveyance system
- Divert illicit discharges to the sanitary sewer or capture, contain, and treat onsite

Eliminating illicit connections may require coordination between multiple agencies and City departments. In some cases, special permits may be needed before material can be discharged to the sanitary sewer system, such as an Industrial Waste Water Permit.

3.5 Record Keeping

The City maintains the following information related to non-storm water discharge and illicit connection investigations:

- Location of incident, portion of storm water conveyance system receiving the non-storm water or illicit discharge, and point of discharge or potential discharge from storm water conveyance system to receiving water

- Source of information initiating the investigation (e.g., public reports, staff or contractor reports and notifications, field screening, etc.)
- Date and time that the information was received
- Date the investigation occurred/began
- Dates of follow-up investigations
- Identified or suspected source of the non-storm water discharge or illicit connection, if determined
- Result of the investigation
- If a source cannot be identified and the investigation is not continued, the incident will be documented pursuant to the requirements of Permit Section E.2.d.(3)

3.6 Enforcement

If the source of a discharge is identified as a controllable source, actions described in the City's Enforcement Response Plan (Appendix B) will be followed to prohibit and eliminate the IC/ID. If the City is unable to identify and document the source of a recurring non-storm water discharge to or from the storm water conveyance system, then the City will address the discharge as an illicit discharge and take the appropriate enforcement actions. In this case, updates will be made to the JRMP as needed to address the common and suspected sources of the discharge within its jurisdiction.

If a responsible party is identified for an IC/ID and compliance has not been achieved within a reasonable time frame (i.e., prior to the next rain event, or within 30 days of becoming aware of the violation, whichever is sooner), Code Compliance or Storm Water Program staff will document information on why the violations have not been corrected within the appropriate timeframe. Escalating enforcement actions will be implemented as outlined in the City's Enforcement Response Plan.

Table 3-2. Methods for Addressing Common Types of Non-Storm Water Discharges[1]

Discharge Type	Capture and Have Disposed of by Certified Hauler	Discharge to Sewer[2]	Direct to Landscaping	Retain and Reuse	Modify Activity Implementation to Prevent Discharge	Obtain NPDES Permit for Discharge to MS4	Implement Required BMPs Before Discharge to MS4	Allowable if not Identified as Pollutant Source
Uncontaminated pumped ground water		X	X	X		X		
Water from crawl space pumps		X	X	X		X		
Discharges from foundation drains and footing drains[3]			X	X				X
Water line flushing and water main breaks						X	X	
Discharges from recycled or reclaimed water lines						X		
Diverted stream flows								X
Rising ground waters								X
Uncontaminated ground water infiltration to MS4								X
Springs								X
Flows from riparian habitats and wetlands								X
Discharges from potable water sources			X	X				
Air conditioning condensate		X	X	X				
Residential vehicle washing		X	X[6]		X			
Dechlorinated swimming pool water	X	X	X					
Saline swimming pool water	X		X					
Building fire suppression system maintenance discharges	X[4]	X	X					
Non-emergency firefighting discharges	X	X	X		X		X	
Emergency firefighting discharges							X[5]	
Irrigation runoff			X	X	X			

Table 3-2. Methods for Addressing Common Types of Non-Storm Water Discharges[1] (continued)

Discharge Type	Capture and Have Disposed of by Certified Hauler	Discharge to Sewer[2]	Direct to Landscaping	Retain and Reuse	Modify Activity Implementation to Prevent Discharge	Obtain NPDES Permit for Discharge to MS4	Implement Required BMPs Before Discharge to MS4	Allowable if not Identified as Pollutant Source
Non-residential vehicle washing	X	X	X[6,7]	X				
Cleaning water not containing added chemicals (e.g., from power washing, hosing, etc.)	X	X	X	X				
Cleaning water containing added chemicals (e.g., mop water)	X	X						
Release of stored storm water from construction sites							X	X

Notes: "X" indicates an acceptable discharge method.

1. The methods for addressing the discharges discussed in this table are based on the requirements of the Municipal Permit and the Municipal Code and present the more common types of discharges and associated disposal methods; however, the City maintains the legal authority to require a different disposal method of these discharges especially if the discharge has been identified as a significant source of pollutants.
2. Verify discharge requirements with PDMWD.
3. If designed to be located above the groundwater table at all times of the year and only expected to discharge non-storm water under unusual circumstances.
4. Discharges that include anticorrosion additives, antifreeze, or other sources of pollutants may not be discharged to the MS4, even if BMPs are implemented.
5. During emergency situations, priority of efforts should be directed toward life, property, and the environment (in descending order). BMPs should not interfere with immediate emergency response operations or impact public health and safety.
6. Only applies to discharges that do not include any additives that may contain pollutants.
7. Non-residential vehicle washing that occurs on an occasional basis may be discharged to landscaping. Designated vehicle wash areas and other facilities or activities that regularly wash higher volumes of vehicles may not discharge wash water to landscaping as the method of preventing discharge to the MS4.

4 Development Planning

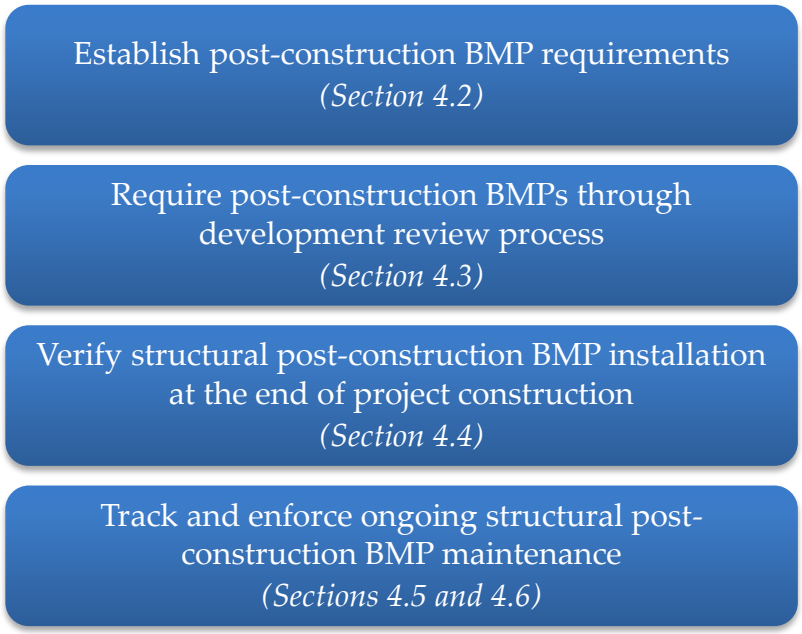
4.1 Introduction

Development projects can result in increased runoff volumes and increased levels of pollutants in runoff relative to pre-development conditions. The addition of impervious surfaces, such as pavement or rooftops, during development can be a key contributor toward flow runoff volume increases. Increased runoff volumes may increase stream flow rates and durations, which in turn can lead to increased erosion in local rivers and streams. This process is referred to as hydromodification. Increases in impervious surfaces may also result in increased conveyance of sediment and other pollutants to local water bodies.

To address these conditions, the City of Santee (City) has established design standards for new development and redevelopment projects that require the use of permanent storm water control measures, including Low Impact Development (LID) measures and other structural post-construction best management practices (BMP), to reduce the potential for pollutants to impact storm water quality and to control storm water discharges (both flow and duration).

The City's Storm Water Ordinance (Santee Municipal Code Chapter 13.42) and Standard Urban Storm Water Mitigation Plan (SUSMP) outline the requirements for development projects in the City. However, the BMP Design Manual is currently being developed and is anticipated to replace the City's existing SUSMP in December 2015. Once it is adopted, the BMP Design Manual will list the specific post-construction best management practice (BMP) requirements developed by the City for development projects. Overall, the City requires these post-construction BMPs through its development review process, and later verifies BMP installation at the completion of construction. The City then continues to track and enforce structural post-construction BMPs (hereinafter, "structural BMPs") following project completion. Figure 4-1 identifies the major components of the City's program to reduce development projects' impacts on the quality and quantity of stormwater discharges, listed in sequential order.

Figure 4-1. Overview of City of Santee Approach to Reducing Storm Water Impacts from Development Projects



4.2 Development Project Requirements

Development projects are defined by San Diego Regional Water Quality Control Board (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001, (Municipal Permit) as new development or redevelopment with land disturbing activities, structural development including construction or installation of a building or structure, the creation of impervious surfaces, public agency projects, and land subdivisions. Through the implementation of the development planning process, the City will reduce the discharge of pollutants from development projects to the Maximum Extent Practicable (MEP), protect waterways, and manage increased volumes of runoff from development projects that have the potential to increase scour and erosion in streams or rivers.

The City's Storm Water Ordinance (Santee Municipal Code Chapter 13.42) and Standard Urban Storm Water Mitigation Plan (SUSMP) require development projects within the City of Santee to incorporate structural post-construction BMPs into their designs. The Model SUSMP and the Hydromodification Plan (HMP) were both developed through a regional effort including the City and the 20 other municipalities in San Diego County.

The municipalities with San Diego County are developing a revised set of post-construction BMP requirements, entitled the BMP Design Manual, to address the requirements of the current Municipal Permit. The new BMP Design Manual is expected to replace the existing SUSMP

post-construction BMP requirements by December 2015. Until then, the existing requirements in the SUSMP remain in effect.

Any development project which does not obtain prior lawful approval prior to the date in which the new requirements go into effect, will be required to update their design to comply with the revised permit requirements. The current SUSMP defines prior lawful approval as having obtained an approval from the City (such as a development agreement or vested tentative map), or having started construction (performed permitted grading in accordance with the approved project) prior to the date that the new requirements go into effect. The City will continue to apply this definition of prior lawful approval until the RWQCB provides further clarification on the definition of prior lawful approval. The City will update its definition based on the most recent direction from the RWQCB.

4.2.1 Types of Development

The City requires project applicants to complete and submit the "Stormwater Priority Determination Form" to assess what level of post-construction storm water requirements apply. Based on information provided in the form, projects are classified as Priority Development Projects (PDP), Standard Development Projects (SDP), or projects that are not considered "development projects" under the Municipal Permit. Not all site improvements are considered development projects since not all improvement work involves activities that have the potential to come in contact with storm water. For example, work that occurs only on the interior of a building is not considered a development project for storm water purposes.

Projects with a greater potential impact on storm water quality are considered PDPs. This determination is based on a number of factors such as the size of the project, amount of impervious area created or replaced, the proposed land use, conditions of the existing land, and the project's proximity to an Environmentally Sensitive Area (ESA). The City's Storm Water Priority Determination Form, the Storm Water Ordinance, and the SUSMP provide more detailed information on how projects are classified.

4.2.2 BMP Requirements for All Development Projects

The City has established a set of minimum post-construction BMP requirements that apply to all development projects. PDPs and SDPs are both required to incorporate site design LID BMPs and a minimum suite of source control BMPs. Because PDPs are larger and/or include activities that have a higher potential to generate pollutants, they are also required to install LID and structural post-construction BMPs which meet numeric sizing standards. In addition, all projects are evaluated for their proximity to ESAs and/or 303(d) impaired waterways and will consider BMP strategies that reasonably address the ESA feature. All of these requirements apply to both private projects and public projects (Capital Improvement Projects (CIP)). More

detailed information about BMP requirements is provided in the SUSMP. Table 4-1 summarizes the post-construction BMP requirements.

Table 4-1. Summary of Post-Construction BMP Requirements

BMP Type	Standard Projects	Priority Development Projects
Site Design LID	X	X[1]
Source Control	X	X
Treatment Control		X[1]

[1] Numeric sizing standards apply to Priority Development Projects. Numeric sizing incorporates design for water quality treatment and, where applicable, peak flow and flow duration control for hydromodification. If numeric sizing standards can be satisfied by LID features only, additional non-LID treatment control BMPs are not required. See the SUSMP for details.

During the process of replacing the SUSMP with the BMP Design Manual, the City will develop standards for PDPs designed to prevent them from having a negative net impact on critical coarse sediment discharges to receiving waters, as required by the MS4 Permit. The regional Watershed Management Area Analysis (WMAA) has identified the locations of critical coarse sediment within the City of Santee and developed a GIS layer that shows the locations of the critical coarse sediment areas. Complete development requirements for projects with critical coarse sediment and hydromodification management guidelines are provided within the SUSMP and BMP Design Manual.

4.2.3 Alternative Compliance Option

As noted earlier, the existing SUSMP will continue to apply until the BMP Design Manual, which incorporates the requirements of the 2013 MS4 Permit, goes into effect (expected December 2015). Under the 2013 MS4 Permit, each municipality has the option to develop an alternative compliance program. An alternative compliance program would provide developers that cannot otherwise meet the requirements solely through onsite BMPs the option to satisfy the requirements by implementing additional water quality and hydromodification features off-site. In many circumstances, off site BMPs may result in a greater water quality benefit when placed downstream of the project, and in closer proximity to the drainage basin's outfall. San Diego County municipalities are currently funding various studies to collect technical information on approaches to evaluate water quality equivalency among multiple BMPs.

The City is open to developing an alternative compliance program and will evaluate the feasibility of establishing such a program once the regional Water Quality Equivalencies and Water Quality Credit Systems are developed and approved. In the meantime, the City will reserve the right to consider proposals to satisfy post-construction BMP requirements through

an alternative to the standard onsite compliance approach. Private project developers and current or future land owners will be responsible for all expenses for preparing documentation and analyses to show how the proposed approach meets Municipal Permit requirements and for all expenses related to BMP construction and long-term operation and maintenance. The City may also require the project proponent to obtain approval from the RWQCB for the proposed design before the City will approve it.

Additional details regarding retrofit and rehabilitation projects are included in Appendix E.

4.3 Project Review and Approval

The City has an established multi-departmental review and verification process for all new development and redevelopment projects, which includes both private and public projects. Through the implementation of development project requirements in the current SUSMP and the application of the procedures detailed below, the City will mitigate the negative impacts of urban runoff from development projects to the Maximum Extent Practicable (MEP).

The Department of Development Services (DDS) is the first point of contact for those wishing to develop within the City of Santee. DDS is aware of its role as a steward for protecting water quality and understands its responsibility to inform project proponents of storm water requirements at the early stages of planning and development. The Planning Division then maintains coordination with the project proponent throughout the permitting process. Planning staff reviews conceptual plans, the existing and proposed General Plan and Zoning designations, environmental and informational studies, and then determines which City Divisions will participate in the review process, and also makes the determination on whether City Council approval is required. City Divisions typically included in the review process are: Planning, Building, Engineering, Traffic, Public Services, and Fire. The Engineering division is the lead division responsible for the review of conceptual plans for potential impacts to water quality. Each division provides Planning with specific project conditions of approval that address a variety of issues, including water quality. Once a project has been approved or conditionally approved, the project proponent begins the plan check process.

4.3.1 Submittal and Review Overview

All development projects within the City of Santee are routed through DDS. In processing development projects, DDS makes the distinction as to whether or not the development project can be approved ministerially, or if it requires discretionary action. A ministerial development project is typically handled "over the counter" and may include such projects as new roof-mounted photovoltaic systems, HVAC work, a home addition, or a commercial interior tenant improvement that solely requires strict administration of codes, rules, and regulations. Ministerial development projects are reviewed for stormwater compliance by the Engineering

Division of the Department of Development Services as part of a corresponding building permit review and may require implementation of stormwater best management practices (BMPs), such as the covering of an existing trash enclosure or the retrofitting of existing onsite landscaping to capture additional storm water.

All other projects not approved ministerially require discretionary action and must go through an "entitlement" process prior to issuance of a grading or building permit. Development projects requiring discretionary action are often complex in nature, requiring environmental clearances under the California Environmental Quality Act (CEQA) and consultation with responsible parties or agencies interested in the project. The entitlement process for a discretionary development project is procedural, with multiple steps that may require several months of processing before final action can be taken on the project by the Director of Development Services or the City Council.

In the City of Santee, development projects requiring discretionary action through such permits as a Development Review Permit, Conditional Use Permit, Tentative Map, or Tentative Parcel Map include new residential, commercial, industrial, and institutional developments. As stewards for local storm water management, Development Services makes a concerted effort to inform developers of the City's storm water requirements during initial meetings, and prior to formal project submittal and the initiation of the entitlement process. Developers are informed of storm water requirements through pre-consultation with DDS staff and through Development Services application forms for various projects. Project application forms include a storm water checklist, a storm water fact sheet, and set forth the requirement for future submittals including landscape plans, hydrology/hydraulic studies, storm water quality management plans, geotechnical studies, drainage studies, preliminary grading plans, and preliminary improvement plans. All applicable documents must be completed in order for the project to be deemed complete for final processing by DDS.

The Department of Development Services reviews storm water-related documentation submitted as part of a development project to verify compliance with all storm water rules and regulations. Furthermore, water quality impacts are analyzed as part the environmental review of the project under CEQA; specifically under CEQA's hydrology and water quality assessment requirements. DDS also works with the project developer to incorporate low impact design (LID) measures and BMPs in landscape, grading, and improvement plans such that they are incorporated to the maximum extent feasible. Development Services also ensures that conditions and measures are in place to ensure that storm water BMPs are sequenced appropriately and to ensure that all project development stages have been adequately addressed. Project developers are also notified during this process, of their responsibility in implementing, monitoring, and maintaining all storm water BMPs and of the City's enforcement and monitoring role during and after construction of the development project.

4.3.2 Submittal and Plan Check Process

All projects (public and private) are required to complete and submit the City's "Storm Water Priority Determination Form". As described in Section 4.2, this form is used to determine whether the project is a Priority Development Project (PDP), a Standard Development Project (SDP), or if it is not considered a "development project" under the requirements of the Municipal Permit. Once project type is determined, the form then directs project proponents to the required storm water documentation that must be prepared and submitted with a project application. All Storm Water Priority Determination Forms must be reviewed and approved by the Engineering Division.

Required submittal forms, plans, and documents are outlined in Table 4-2. Figure 4-2 outlines the overall project review and approval process. Permits are not issued and construction is not allowed to begin until all applicable submittals from Table 4-2 have been submitted and accepted. The City performs internal reviews of all CIP projects which are subject to post-construction BMP requirements. Once the plan check process is complete and all project plans are approved, the permits are issued, and construction may begin.

Table 4-2. Required Submittals

Submittal	Priority Development Project (PDP)	Standard Development Project (SDP)
Priority Determination Form	X	X
Site Design and Source Control BMP Checklist	X	
Storm Water Quality Management Plan (including O&M)	X	
Minimum BMPs and LID Project Form		X
BMP Plan Sheet	X	X
Facility Maintenance Agreement[1]	X	

[1] CIP projects will prepare a Departmental Memo.

Project Application

During the early planning stages, the applicants submit a project application. Sometimes a pre-application meeting is held in which City staff explains storm water requirements. If a pre-

application meeting is held, a determination on whether a project is a PDP is typically made during the meeting.

Priority Development Projects (PDP)

Development projects determined to be PDPs must submit a Storm Water Quality Management Plan (SWQMP), which documents how all required site design, source control and structural post-construction BMPs have been incorporated into the project design. The City's SUSMP provides more detail on what is required to be included in a SWQMP and with project plans. Operation and Maintenance (O&M) Plans are also required for all PDPs as part of the SWQMP. All private PDPs are required to submit a completed Storm Water Facilities Maintenance Agreement (SWFMA) to assure ongoing long-term maintenance of all structural BMPs. The SWFMA for each project is recorded with the County Recorder and runs with the land, which means maintenance responsibility is transferred with sale of the property.

The Engineering Division reviews the SWQMP, including O&M plan, to verify that it meets the SUSMP requirements. The project proponent is notified of any deficiencies and required to resubmit a revised SWQMP as necessary for additional review(s). This process continues until the final SWQMP meets post-construction BMP requirements and is approved by the City.

Standard Development Project (SDP)

Development projects determined to be SDPs that still require permits and/or approvals for significant exterior construction must complete a "Minimum BMPs and LID Project Form", which documents how site design and source control BMPs have been incorporated into the project design. The Engineering Division reviews the Minimum BMPs and LID Project Form to verify that it meets all storm water requirements. The project proponent is notified of any deficiencies and required to resubmit a revised BMP form as necessary for additional review(s) until the form is approved.

All Projects (PDPs and SDPs)

To ensure that BMPs for all projects are properly installed and constructed, the City requires project proponents to prepare a BMP Plan Sheet as part of the plan submittal. The single BMP Plan Sheet includes a site plan which depicts the location of each required site design, source control and structural BMP, each of which is uniquely coded/numbered. In addition, the plan must include a matrix listing all BMPs and provide a reference to the specific construction drawing sheet where each of the BMPs is shown. This matrix will also reference any associated specification sheets (CASQA or Caltrans), and a brief description of maintenance requirements. A copy of the BMP Plan Sheet will be attached to each construction drawing set (building, mass grading, finished grading, improvements, and grading).

Construction Changes

If there are any changes that occur during construction that affect proposed TCBMPs in any way, an amended SWQMP is required to be submitted and approved by the Engineering Division prior to the approval of any construction changes. Should changes be made in the field (modifications/construction) without an approved SWQMP revision or approved construction change, the project will be issued a Stop Work Order until the items are addressed to the satisfaction of DDS.

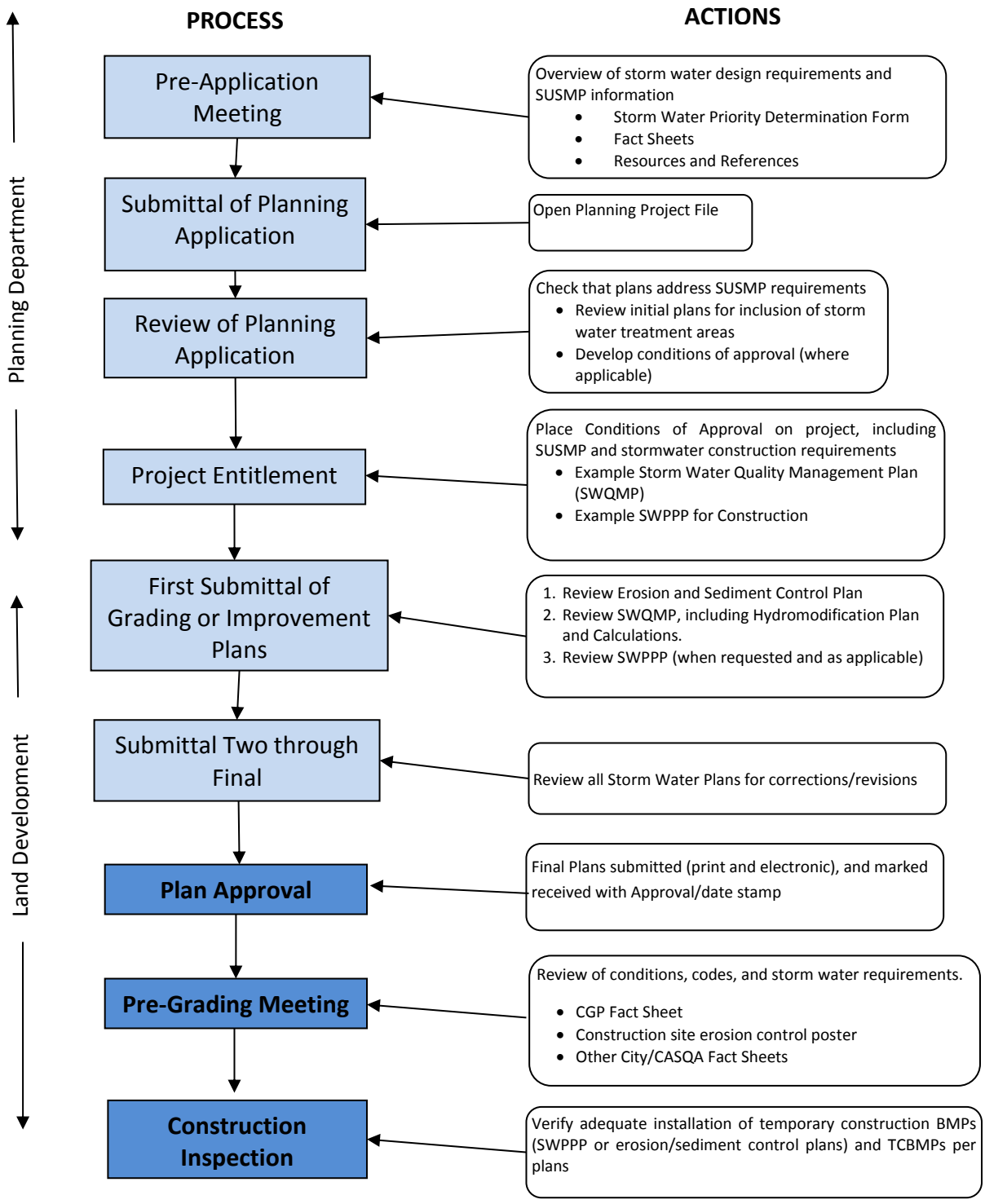
Verification of TCBMPs

The project proponent is required to document all phases of the construction and installation of each TCBMP per the approved grading plan in order to demonstrate proper placement, sizing, media, and functionality. At a minimum, documentation shall include photographic documentation showing all stages of installation; an installation log sheet; TCBMP related material receipts; other supporting documentation as requested; and, a certification form to be completed and signed off by Engineer of Work.

Final Sign Off – Certificate of Occupancy

At the conclusion of project construction, before occupancy permits are granted or construction securities are returned, the City Engineer will review the TCBMP verification documentation submitted by the Engineer of Work, and the City project engineer will make a final inspection of the site to verify installation of all post-construction BMPs per the project plans (BMP plan sheet and SWQMP). After BMP installation has been verified, but before final occupancy has been granted, the SWFMA for each project is required to be recorded with the County Recorder.

Figure 4-2. Priority Development Project Review and Approval Process



4.4 Verification of Structural Post-Construction BMPs (Treatment Control BMPs)

The assigned project engineer, storm water program staff, and the engineering inspector perform routine inspections of construction sites and all BMPs that are associated with the project (for both private and Capital Improvement Program (CIP) projects). The City Engineer assigned to the development project will review each project to ensure that all Treatment Control BMPs (TCBMPs) proposed in the design stage are installed and constructed per plan. The BMP plan sheet described in Section 4.3.2 is used as a key reference during these verification inspections.

In addition, the City requires that the developer submit documentation demonstrating the proper installation of selected TCBMPs. At a minimum, the developer must provide photo documentation showing proper sizing and installation and receipts or invoices for materials utilized to construct the TCBMP (soils media, plant types, and other building materials), and any other documentation as may be requested by the City. Other requested documentation may include percolation or infiltration tests for infiltration or bioretention BMPs. The Engineer of Record is required to sign and seal all 'As-builts' related to TCBMP installation.

Prior to certifying a project's completion, issuing a certificate of occupancy, returning the applicant's bonds, or allowing the project to submit its Notice of Termination with the State, the City verifies that the site has been completely stabilized and that all TCBMPs have been installed per the SWQMP. In the case of CIPs, the City may withhold operational acceptance or notification of completion from the contractor until the site is stabilized and all TCBMPs are verified.

If any BMP is noted to be missing or incorrectly installed by any of the City's inspectors during or upon completion of construction, appropriate enforcement measures as described in Section 4.6 and in the City's Enforcement Response Plan (Appendix C) will be taken to require the proper installation of all approved structural BMPs.

4.5 TCBMP Tracking and Maintenance Verification

After TCMPs are installed, the City takes measures to track these BMPs and to verify that they are properly maintained and operating effectively. Maintenance and verification applies to structural TCBMPs on both private and municipal developments. As part of the 'Complete Property' inspection program, the City will also inspect other storm water BMPs during the TCBMP inspection, as applicable.

4.5.1 Inventory Tracking

After the City verifies proper installation of TCBMPs, and the project construction is complete, the project is added to the City's TCBMP inventory. The City maintains this inventory and the following information in an Excel spreadsheet:

- Project name, address, and hydrologic subarea (HSA)
- Date of construction
- Approximate project size
- The party responsible for maintenance of the BMPs
- Type, number, and location of each TCBMP
- CASQA reference sheet number
- Inspection dates and findings
- Self-certification submittal date
- Corrective Action Response and the date resolved

The City prioritizes its inventory of PDPs by designating each project as either "high" priority or "standard" priority. A project is assigned a priority when it is first added to the inventory, and prioritization is reevaluated, as necessary, based on compliance history during each annual inventory update.

The City has developed criteria to identify high priority projects based on the criteria in Provision E.3.e.(2)(b), with an overall goal of focusing inspection resources on the projects and BMPs likely to make the largest difference in achieving water quality improvement. Table 4-3 identifies the criteria will be used to determine whether the TCBMP facility will be considered as "high" priority; all other inventoried projects are considered "standard" priority. The highest priority water quality condition, as identified in the San Diego River Water Quality Improvement Plan, is indicator bacteria for the lower watershed. Whether or not there is a likely presence of bacteria at a particular project is taken into consideration during the prioritization process.

Table 4-3. Structural BMP Prioritization Factors

Flow Chart Prioritization Factor	Corresponding Municipal Permit Prioritization Criteria	Rationale/Notes
Project Size (≥ 10 acres or ≥ 4 acres)	• Number and size of structural BMPs • Likelihood of operational and maintenance issues associated with BMP(s)	Larger sites with more BMPs and BMPs with larger drainage areas have a larger potential positive impact on water quality if properly maintained.
Industrial/commercial land use	• Land use and expected pollutants generated	Businesses are expected to be more concentrated sources of bacteria (the highest priority water quality condition for the San Diego River).
Directly discharging to or located within 200 feet of an ESA	• Receiving water quality	Sites next to an ESA may have a disproportionate impact on ESAs if BMPs are not properly maintained
Site-specific factors (see footnote in Figure 4-2)	• Compliance record • Likelihood of operational and maintenance issues associated with BMP(s) • Recommended maintenance frequency of the BMP(s)	City staff may adjust priorities based on results from inspections and review of submitted maintenance verification information.

4.5.2 Maintenance Verification and Inspections

4.5.2.1 Annual Maintenance Verification

Operation and maintenance checklists are required with a project's SWQMP, and can be used by responsible parties to guide maintenance activities. In addition, the City will implement an annual certification program to verify that structural post-construction BMPs associated with PDPs sites are, in fact, being maintained as designed. Each year responsible parties for PDPs will be required to submit a certification form to the City, documenting dates of inspection/maintenance for each BMP on site. Maintenance verification forms must be completed and signed by the responsible party and submitted to the City. Evidence that maintenance activities were properly conducted must be provided and may come in the form of photographs, invoices, and/or other detailed descriptions of materials removed and disposed of properly.

4.5.2.2 Maintenance Inspections

TCBMPs installed at all development projects will be subject to inspection by City inspectors to ensure treatment controls are in working order and are being properly maintained. Each year, all "high" priority projects will be inspected prior to the start of the rainy season (i.e., prior to October 1). In addition to inspecting all high priority sites before the start of the rainy season, any projects that do not provide sufficient documentation to verify that appropriate

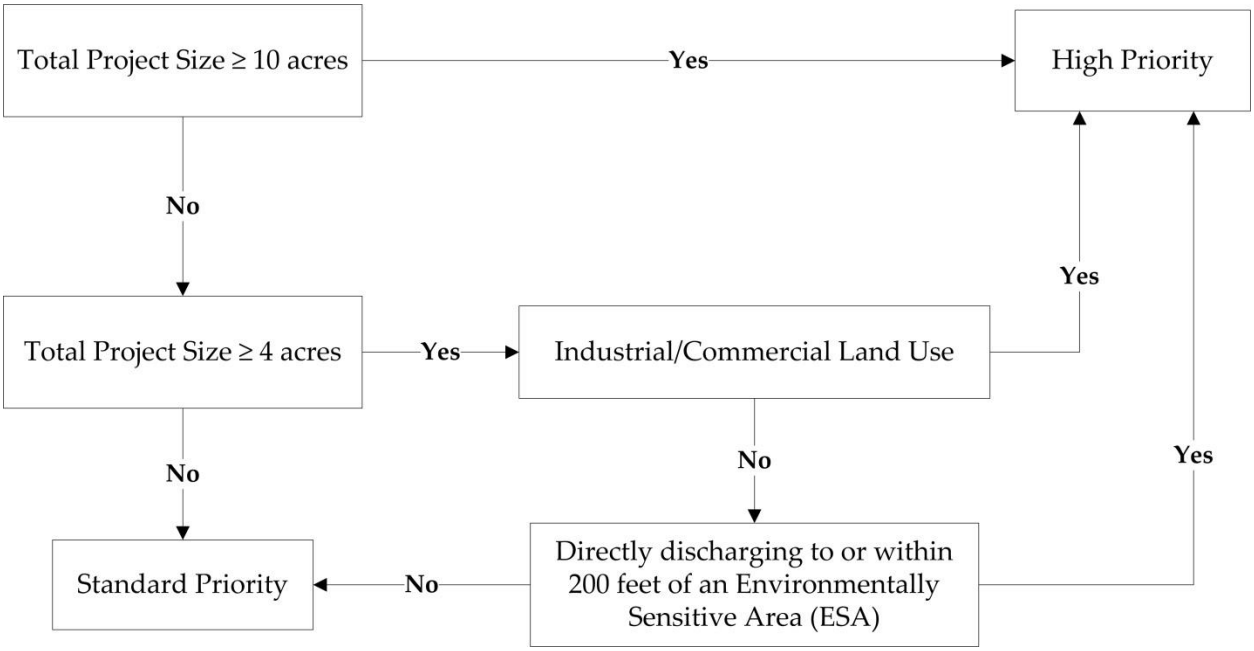
maintenance work has been performed through the annual maintenance verification program described above will also be inspected before the end of the fiscal year. Additional standard priority sites may be inspected based on site compliance history and City staff professional judgment. Inspections will verify that all TCBMPs and project-related BMPs are in working order, properly maintained, and in compliance with all applicable City ordinances and permits. The inspector will document all inspection findings and any follow-up actions on a TCBMP Inspection Form and in the City's TCBMP spreadsheet. If any deficiencies are noted during the inspection, the responsible party will be notified, and a timeline for corrective action response will be set. The City will also implement escalating enforcement actions to achieve compliance, as described in Section 4.6.

It should be noted that the City of Santee, in accordance with the strategies set forth in the San Diego River WQIP, has established a 'Complete Property' inspection program where inspections address the entire project, property, or development (i.e., retail strip mall). Therefore, when it is time to inspect the property for either TCBMPs or the property's (residential or business) general compliance with minimum BMPs, the entire site will be evaluated for compliance with storm water requirements.

4.6 Enforcement

The City will use a variety of enforcement methods to ensure all TCBMPs on its inventory are properly operated and maintained. Enforcement measures will escalate with continued violations as necessary. A detailed description of the different enforcement measures used by the City of Santee to ensure proper BMP maintenance can be found in the City's Enforcement Response Plan (Appendix B). As required by the Municipal Permit, a rationale will be recorded whenever compliance cannot be achieved within 30 days. Note that enforcement measures related to ensuring structural post-construction BMPs are built per the plans, prior to the completion of project construction, are discussed in Section 4.4.

Figure 4-3. Prioritization Process for Projects with Structural BMPs



Notes:

- Industrial/Commercial Land Use – any project for which any of the following Priority Development Project categories applies: Industrial Development, Heavy Industry, Commercial Development, Automotive Repair, Restaurant, or Retail Gasoline Station.
- The City may adjust assigned priorities based additional site-specific conditions or factors, such as maintenance history or inspection compliance history.

5 Construction Management

5.1 Introduction

Construction activities include clearing, grubbing, grading, stockpiling, excavation, building, landscaping, utility installation, and street improvements. All pollutants potentially generated by these and other construction-related activities can impact the City of Santee's (City's) storm water conveyance system, as well as local receiving waters and the San Diego River Watershed. The construction management component of the City's Jurisdictional Runoff Management Program (JRMP) identifies the pollutants that may exist at active construction sites and presents a range of best management practices (BMP) and supporting administrative processes designed to eliminate or reduce them.

As a measure to protect water quality, the City treats certain construction sites as high priority. High priority sites receive more frequent inspections by City staff than other construction sites in order to reduce discharges of sediment. This should help reduce the mobilization of bacteria to receiving waters; bacteria are the highest priority water quality condition in the San Diego River Watershed.

The cooperation of various responsible parties, such as construction site owners and developers, is key to the continued success of Santee's JRMP in complying with Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 (Municipal Permit). To secure their cooperation, the City has updated its ordinances and guidance documents as an authorized form of legal enforcement. The following sections detail how the City will meet the minimum requirements outlined in Section E.4 of the Municipal Permit to eliminate or reduce the release of pollutants into the storm water conveyance system and adjacent water bodies to the maximum extent practicable.

5.2 Best Management Practice Requirements

5.2.1 Minimum BMP Requirements

Construction sites within the City's jurisdiction are required to implement and maintain BMPs in the following categories, where applicable, as required by the Municipal Permit:

- Project Planning
- Erosion Control
- Sediment Control
- Run-on and Runoff Control

- Good Site Management ("Housekeeping"), including Waste Management
- Non-Storm Water Management
- Active/Passive Sediment Treatment Systems

The City uses the California Stormwater Quality Association (CASQA) BMP fact sheets as the guidepost for minimum BMP standards. The City's Guidelines for Surface Water Pollution Prevention (Appendix C) provides more detail on the BMP requirements, including identifying how the CASQA BMPs align with the Municipal Permit BMP categories listed above. The City's Guidelines for Surface Water Pollution Prevention also identifies which CASQA BMPs are likely applicable to each phase of construction, and projects are required to schedule in advance which BMPs may be applicable to each phase. The City's requirements are based on three major phases of construction, as defined below:

- **Grading**: Demolition, right-of-way work, site preparation and earthmoving, earthwork, construction or relocation of above ground and below ground utilities, construction or relocation of below ground structures, work associated with construction of above ground structures more than five feet from the structures, dewatering, and hydrostatic testing of utilities and fire systems.
- **Vertical:** Construction of above ground structures in the area within five feet from structures, stucco, framing, mechanical, roofing, painting, drain flushing, and fire system testing (hydrants, sprinklers).
- **Finish:** Roadways, slurry seal, asphalt, concrete, walkways, parking lots, landscaping, painting, striping, traffic and lighting facilities, architectural.

The City requires a complete set of BMPs at all sites, with an emphasis on an effective combination of both erosion and sediment control BMPs. Sediment control BMPs (typically known as perimeter controls) must always be implemented along with erosion control BMPs (intermediate controls). All construction BMPs must be properly installed, routinely inspected, and maintained until they are removed. The BMPs selected for each project must be appropriate to the types of work proposed, including the different phases of construction. Projects one acre or greater in size are also subject to the requirements of the statewide Construction General Permit, State Water Resources Control Board Order No. 2009-0009-DWQ, as amended by Order Nos. 2010-0014-DWQ and 2012-0006-DWQ (Construction General Permit).

The City may require additional BMPs to be implemented at construction sites, above and beyond those listed in the City's Guidelines for Surface Water Pollution Prevention, to prevent pollutants from discharging from construction sites to the maximum extent practicable.

5.3 Project Approval Process

All land development projects (either private or CIP) that will disturb soil are required to complete an Erosion Control Plan. The Department of Development Services (DDS) reviews the Erosion Control Plan for consistency with the minimum BMP requirements, as outlined in the City's Guidelines for Surface Water Pollution Prevention (Appendix C). The Erosion Control Plan is included as part of the grading plan submittal to DDS, and a grading permit is not issued until the grading plan submittal, including the Erosion Control Plan, is approved. The City also requires projects subject to the Construction General Permit (CGP) to submit proof of coverage before construction work is permitted to begin.

When a project is subject to the Construction General Permit, the City also reviews the Storm Water Pollution Prevention Plan (SWPPP). The City focuses its review on the project description, construction schedule, activity specific BMPs, and the monitoring plan. The City requires an erosion control bond, which allows for the City to step in to perform BMP implementation or repair should the developer not adequately implement such controls. The erosion control bond ensures that funds will be available to repair or construct BMPs in the event of default by the responsible party.

5.4 Construction Site Inventory and Prioritization

The City maintains an inventory of active construction sites within its jurisdiction. The inventory includes details on each construction site, including project name, location, and construction site priority. Privately-owned development projects are added to the City's construction inventory when grading permits are approved. CIP projects are added to the construction inventory when a project begins construction. Completed projects are removed from the inventory upon finalization, as reported by City inspectors. The City's construction inventory is updated on a regular basis (and at least quarterly). The City uses spreadsheet to manage its inventory, and includes the following components as required by the Municipal Permit:

- Contact information for each site (e.g., name, address, phone, and email for the owner and contractor)
- Basic site information including location (address and hydrologic subarea (HSA)), Waste Discharger Identification (WDID) number (if applicable), size of the site, and approximate area of disturbance
- Whether the site is considered high priority
- Project start and completion dates
- Required inspection frequency

- Date of permit issuance
- Any enforcement actions administered to the site

Although the City of Santee is required to only identify high priority and standard priority, the City assigns a priority of high, medium, or low priority, as summarized in Table 5-1. The City designates projects that represent a high threat to water quality with a "high" site priority and has aligned the local definition of "high threat to water quality" to the risk determination approach of the Construction General Permit. The Construction General Permit determines risk level based on project specific sediment risk and receiving water risk, which addresses the required factors of Municipal Permit Section E.4.b.(2). Whether or not a construction project is located within, is directly adjacent to (within 200 feet of), or discharges directly to a receiving water within an environmentally sensitive area is also a factor in determining a construction site's priority.

Table 5-1. Criteria to Identify High Priority Construction Projects

Construction General Permit Criterion	Environmentally Sensitive Area[1]	Site Priority
Risk Level 2 or 3 LUP Type 2 or 3	Yes or No	High
Risk Level 1 or LUP Type 1	Yes No	High Medium
All other projects	Yes No	Medium Low

Notes: LUP – Linear Underground/Overhead Project

[1] Located within, directly adjacent to (within 200 feet of), or discharging directly to a receiving water within an environmentally sensitive area. See Section 1 of this JRMP document for more information about the City's environmentally sensitive areas.

5.5 Inspection of Construction Sites

The City has an established inspection program to evaluate proper BMP implementation at construction sites within the City's jurisdiction. The inspection program is designed to confirm sites reduce the discharge of pollutants in storm water to the maximum extent practicable and effectively prohibit non-storm water discharges.

Pre-construction meetings are typically held with the contractor before work begins. During these meetings City staff discuss BMP requirements, including how they apply over the life of the construction project, as it progress from one phase to another. Contractors are also informed that City inspectors have the authority to require implementation of any and all BMPs the inspector deems necessary to reduce pollutant discharges to the maximum extent practicable, even if those BMPs are not explicitly shown on the project's Erosion Control Plan.

Once construction starts, the Engineering Inspector is tasked with performing regularly scheduled site inspections to ensure BMPs are implemented consistent with the Erosion Control Plan and the City's Guidelines for Surface Water Pollution Prevention during each stage of development.

5.5.1 Inspection Frequency

The criteria used to determine a construction site's priority discussed in Section 5.4 were developed to correspond to the inspection frequencies established by the City. Table 5-2, below, presents the construction site priorities and their corresponding inspection frequencies for the wet (October 1 through April 30) and dry (May 1 through September 30) seasons.

Table 5-2. Construction Site Inspection Frequency

Construction Site Priority	Wet Season Inspection Frequency	Dry Season Inspection Frequency
High	Every two weeks	As needed
Medium	Monthly	
Low	As needed	

The City re-evaluates a construction site's priority and subsequent inspection frequency on a regular basis, particularly when grading activities are being conducted during the wet season. The City maintains the right to inspect a site as often as deemed necessary. The need for additional inspections can vary depending on site conditions, previous violations, history of developer or contractor past performance, and/or weather patterns. The number of inspections performed at each construction site will be tracked to ensure all construction sites in the City's inventory are being inspected at the appropriate frequency.

The City's construction inspection program is expected to reduce discharges of sediment and other pollutants associated with construction projects. Since most discharges of sediment from construction sites occur when it rains, the City also sends out a Courtesy Rain Notice to all construction sites asking them to perform a pre-rain inspection, reminding them of the need to stabilize their site, and implement their REAP or monitoring plans as applicable. Regular interaction with site's responsible parties will allow City inspectors to ensure appropriate BMPs are in place as construction activities and phases change over time.

5.5.2 Inspection Procedure

Site inspections evaluate compliance with the City's minimum BMP requirements, with the SWPPP if applicable, and as may be required through applicable ordinances and permits. Inspection findings are documented on the City's Construction Site Storm Water Inspection form. At a minimum, inspections include the following components.

- Assessment of the implementation of all required minimum BMPs and any additional BMPs that may be deemed necessary by the City. This assessment includes evaluating the adequacy and effectiveness of implemented BMPs, including how they are maintained.
- Assessment of whether project proponents are making appropriate adjustments when BMP deficiencies are found as a result of self- or City-conducted inspections.
- Visual observations of actual or potential discharges of sediment or construction related materials from the site.
- Visual observations to evaluate presence of non-storm water discharges.
- Visual observations of actual or potential illegal connections.
- Verify that the SWPPP is on site, and inspection records are current, when applicable.

A Construction Site Storm Water Inspection report is provided following the inspection. This report identifies the current conditions of the site, any corrections or improvements needed, if violations were observed, and also a corrective action response timeline. If corrections are required, a compliance timeline is set, and noted on the inspection report.

When an inspection finds a site not in compliance with this chapter, the City requires that the site provide a Corrective Action Response (CAR) documenting that corrections were made by a predetermined due date. Follow-up site visits are made as needed, depending on the severity and compliance history of the site. Depending on the severity and/or reoccurrence of the violations, the inspector may also issue a Notice of Violation, which may include an Administrative Citation. Escalating enforcement actions will be taken as necessary to bring about compliance, as discussed in Section 5.6 and in the Enforcement Response Plan (Appendix B).

5.5.3 Inspection Tracking

Each inspection form, which includes site photos, is stored electronically. The number of inspections performed at each construction site will be tracked in the City's construction inventory spreadsheet to ensure all construction sites in the City's inventory are being inspected at the appropriate frequency. Inspection records will include the following information, at a minimum:

- Site name and location,
- Inspection date(s),
- CAR timeline, and descriptions of inspection comments which must, at a minimum, include rationales for longer or extended compliance times,

- Description of any enforcement actions issued, and
- Resolution of problems noted and date problems were fixed.

Inspection records and related documentation will be made available to RWQCB staff upon request.

5.6 Enforcement

The City enforces storm water requirements at all construction sites in its jurisdiction. Should deficiencies and/or violations not be corrected within the timeline provided by the storm water enforcement officer, the City will implement escalating enforcement actions as outlined within the City's Enforcement Response Plan (Appendix B). Enforcement actions typically include: written notices and warnings, Notices of Violation, Stop Work Orders, and Administrative Citations (fines).

City inspectors seek to achieve a return to compliance within three working days. Depending on the threat to water quality and the amount of time it would reasonably require to address the deficiencies, an alternative compliance timeline will be considered. Additional enforcement actions will be taken as necessary achieve a return to compliance. In cases where the violation cannot be resolved within two weeks, the responsible party shall submit a staged Corrective Action Response Plan along with incremental goals and timelines for completion. Time extensions will be reviewed on a case by case basis provided the request is submitted in writing prior to the expiration of the original compliance timeframe, and the request provides sufficient reasoning for the time extension. The RWQCB will be notified within five days whenever a stop work order and/or when a return to compliance is not achieved within a reasonable timeframe, as determined by the City. The City's Enforcement Response Plan provides additional details on the escalating enforcement actions that will be implemented.

6 Industrial and Commercial Facilities

6.1 Introduction

Approximately 7% of the land area in the City of Santee (City) is classified as industrial or commercial. The City requires industrial and commercial sites or sources to implement pollution prevention methods, also known as best management practices (BMPs), to reduce discharges of pollutants to the storm water conveyance system. The minimum suite of BMPs based on the industry and activity are listed within the City's Guidelines for Surface Water Pollution Prevention (Appendix B) and have been developed based on the requirements of San Diego Regional Water Quality Control Board (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 (Municipal Permit). The City maintains an inventory of businesses subject to these requirements and facilitates BMP implementation through education, inspections, and enforcement. The City has also incorporated strategies identified in the San Diego River Water Quality Improvement Plan (WQIP), which includes a focus toward bacteria generating activities, the highest priority water quality condition (HPWQC).

6.2 Industrial and Commercial Facility Inventory

6.2.1 Background

A watershed-based inventory of known industrial and commercial businesses and properties (collectively, "facilities") within the City's jurisdiction has been developed and will be updated annually. The types of businesses included on the inventory are listed in Section 6.2.3. These types of businesses are believed to have the potential to discharge pollutants into the storm water conveyance system and potentially impact local water quality.

6.2.2 Data Sources and Management

The City uses business license data and an Excel spreadsheet to regularly maintain and update a watershed-based inventory of industrial and commercial facilities within its jurisdiction. The purpose of the industrial and commercial inventory is to assist in identifying pollutants that may be associated with these facilities, and to prioritize according to their potential impacts to the storm water conveyance system and receiving waters. Initial information used to update the inventory is gathered from the following sources and contained on an Excel spreadsheet or other electronic database:

- City of Santee business license listings
- Inspection findings

- RWQCB list of businesses with individual National Pollutant Discharge Elimination System (NPDES) permits
- State Water Resources Control Board (SWRCB) list of facilities covered under the NPDES Industrial General Permit (IGP)
- Complaints filed for unregistered businesses

6.2.3 Inventoried Facilities

Businesses identified from the data sources described above are classified as inventoried or not inventoried based on their Standard Industrial Classification (SIC) code. The City maintains a list of SIC codes associated with the types of activities listed below; businesses with those SIC codes are included on the inventory.

Facilities may be inventoried on the property level, where applicable, in accordance with a San Diego River WQIP strategy to target high priority "complete property" sites as sources of bacteria. A property is defined as a grouping of land parcels, or a single parcel, on which more than one business is intended to operate, and whose common areas are generally managed by a single entity, such as a property owner, manager, or owner's association.

Industrial Facilities

- Industrial facilities, as defined by 40 CFR § 122.26(b)(14): generally includes manufacturing, machining, trucking, and mining.
- Facilities subject to the IGP or other individual National Pollutant Discharge Elimination System (NPDES) permits
- Operating and closed landfills
- Facilities subject to Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986
- Hazardous waste treatment, disposal, storage and recovery facilities

Commercial Facilities

- Automobile repair, maintenance, fueling, or cleaning
- Airplane repair, maintenance, fueling, or cleaning
- Boat repair, maintenance, fueling, or cleaning
- Equipment repair, maintenance, fueling, or cleaning
- Automobile and other vehicle body repair, or painting
- Automobile (or other vehicle) parking lots and storage facilities
- Retail or wholesale fueling

- Contractors with storage yards
    - Painting and coating
    - Cement mixing or cutting
    - Masonry
    - Landscaping
    - Pest-control services
    - Other contractors
- Eating or drinking establishments, including food markets
- Botanical or zoological gardens and exhibits
- Nurseries and greenhouses
- Golf courses, parks and other recreational areas/facilities
- Cemeteries
- Marinas
- Building material retailers and storage
- Animal facilities
- Portable sanitary services

Mobile businesses known to operate within the City's jurisdiction are tracked on the City's inventory. A field in the City's business license inventory indicates whether a new business is mobile. Unlicensed mobile businesses are identified and added to the inventory based on incidents reported to the City's Hotline and violations directly observed by City or contract staff. The following business types are the common types of mobile business in the City:

- Mobile vehicle washing/detail
- Mobile carpet, drape or furniture cleaning
- Mobile handyman /remodeler
- Plumbers
- Landscapers & pest control services
- Window Cleaning
- Pool and fountain cleaning
- Surface maintenance / power washing
- Fire system maintenance vendors

Other industrial or commercial facilities that the City deems a threat to water quality may also be included on the business inventory.

6.2.4 Inventory Data Management

Inventoried facilities are tracked through the City's industrial and commercial Excel spreadsheet in accordance with the Municipal Permit Section E.5.a. At a minimum, the inventory includes, where applicable, the following information for industrial and commercial facilities within its jurisdiction:

1. Name and location (hydrologic subarea (HSA) and address)
2. Classification as commercial or industrial
3. Status of facility or area as active or inactive
4. Identification of whether a business is a mobile business
5. SIC code(s)
6. IGP Notice of Intent (NOI) and/or Waste Discharger Identification number
7. Identification of pollutants potentially generated by the facility or area
8. Whether the facility or area is adjacent to an environmentally sensitive area (ESA). "Adjacent" is defined as being within 200 feet of an ESA. This is in accordance with past procedure and with the most recent definition provided by the RWQCB, which is found in Order No. R9-2007-0001. A map of ESAs is included in Figure 1-2.
9. Whether the facility or area is tributary to and within the same HSA as a water body segment listed as impaired on the Clean Water Act Section 303(d) List of Water Quality Limited Segments (303(d) list) and generates pollutants for which the water body segment is impaired. This process is described in Section 6.2.5 below.

Businesses for which this information has not yet been obtained may be mapped by street address. Therefore, the City has the ability to map the location of inventoried existing development, along with watershed boundaries and water bodies, as required by the Municipal Permit.

6.2.5 Inventory Prioritization

Section E.5.c.(1)(a) of the Municipal Permit requires that inspections are performed at an appropriate frequency to confirm that BMPs are implemented to reduce the discharge of pollutants to the storm water conveyance system to the maximum extent practicable and that they are effective in reducing or eliminating non-storm water discharges. The inspection frequencies are determined by taking into consideration the potential for a facility or area to discharge non-storm water and/or pollutants. The prioritization also reflects the priorities set forth in the WQIP. The City prioritizes facilities for inspections as having either a "high" or "standard" priority, with high priority facilities generally subject to more frequent inspections,

as discussed in Section 6.4.1. The City focuses on the following when assigning a high inspection priority:

1. History of non-compliance
2. Identified as a potential source of pollutants which are associated with a HPWQC or downstream impairment

Each of the above factors is described in more detail below.

History of non-compliance

Facilities with a history of poor compliance with the City's Guidelines for Surface Water Pollution Prevention, which have not been resolved through structural changes, are considered high priority. Compliance is based on the results of a facility's most recent inspection, and poor compliance means one or more significant BMP deficiencies or illegal discharges were identified during the inspection and required the City to take follow-up action to resolve the deficiencies. Complaints made to the City Hotline will also be considered to assess priority. Additionally, results from dry weather field screening at the City's major outfalls may aid in identifying facilities that contribute discharges to the storm water conveyance system, and thereby set a high priority designation. If inspections of these facilities develop a satisfactory pattern of compliance, the facility may be reprioritized and assigned a standard priority. Typically this is satisfied by demonstrating that the original deficiency was resolved and then demonstrating continued compliance during the next routine inspection.

Identified as a potential source of pollutants associated with a HPWQC or downstream impairment

Bacteria have been identified as the HPWQC within the San Diego River WMA. Facilities that have been determined to be likely sources of bacteria are assigned a high priority for inspection. When facilities are originally listed on the inventory, they are assigned a category based on their SIC code and then assigned a pollutant discharge potential using Table 6-2, based on the category. Businesses are considered sources of a given pollutant if the pollutant discharge potential in Table 6-2 is marked as "Likely." As businesses are inspected, site-specific findings are used to update the pollutant discharge potential listed on the City's industrial/commercial inventory.

Additionally, facilities that have not been previously inspected are classified as high priority if they are identified as likely to discharge pollutants for which a facility's receiving water body is 303(d) listed. See Table 6-1 below for applicable 303(d) listings and the associated pollutant categories. Common potential pollutants that may be generated at industrial and commercial facilities are listed in Table 6-2, at the end of this section. After a facility is inspected, the

pollutant discharge potential ratings will be updated to reflect observed site conditions, and inspection compliance history will be considered to prioritize the facility in the future.

Table 6-1. 303(d) Listed Impairments and Pollutants for Receiving Waters

Water Body (HSA)	HPWQC and/or 303(d) Listed Impairment		Pollutant Category (from Table 6-2)
San Diego River, Lower (907.12)	Indicator Bacteria[1] Low Dissolved Oxygen Manganese[2]	Nitrogen Phosphorous Total Dissolved Solids[2] Toxicity[3]	Bacteria/Viruses Oxygen Demanding Substances Nutrients
Forester Creek (907.12, 907.13)	Indicator Bacteria[1] pH[3]	Selenium[2] Total Dissolved Solids[2]	Bacteria/Viruses

Notes:

1. The HPWQC for the San Diego River Watershed.
2. There are no known classes of businesses identified as sources of these pollutants. If source is discovered during a site inspection, the business will be prioritized as a high threat.
3. Condition has not been specifically associated with any particular pollutant at this time.

City staff has the authority to classify other businesses that may contribute significant pollutant loads or non-storm water discharges to the City's storm water conveyance system as high priority. The remaining businesses on the inventory are classified as standard priority.

6.3 Best Management Practice Requirements

The City requires commercial and industrial businesses to implement and maintain BMPs to prevent pollutants from entering the storm water conveyance system. The City has updated its minimum BMPs specific to industrial and commercial facilities, which are detailed in the Guidelines for Surface Water Pollution Prevention (Appendix B). The City's Storm Water Ordinance also gives authorized enforcement staff the authority to require additional BMPs above and beyond the minimum BMPs where necessary to reduce discharges of pollutants to the maximum extent practicable. Businesses may also be required to develop and implement site-specific BMP plans.

Consistent with the San Diego River WQIP, the minimum required BMPs prohibit irrigation runoff, which can transport bacteria, and require sediment and erosion control to reduce potential for mobilization of soil particles and bacteria associated with sediment. Specifically, the City's WQIP goals include implementing a "complete property" inspection program that targets entire high priority sites (e.g. mall or retail center) to reduce discharges of bacteria. In

addition, the City is working to address housekeeping practices at eateries (including grease management, outdoor seating areas, and trash enclosures).

6.4 Best Management Practice Implementation

The City inspects industrial and commercial facilities to require compliance with the established minimum BMPs and the Storm Water Ordinance. The City also provides education and outreach to the businesses to make them aware of and encourage compliance with the requirements, as described in Section 10.

6.4.1 Inspection Frequency

The frequency of inspections is based on the facility's inspection priority established through the prioritization process described in Section 6.2.5. The inspection program is designed to meet the following Municipal Permit objectives:

- Inspect all inventoried industrial and commercial facilities at least once within a five-year period. These inspections may be either onsite individual business inspections, property-based, or drive-by inspections.
- Annually complete a number of onsite inspections equal to 20 percent of the total number of inventoried facilities. If multiple onsite inspections are completed at a facility in a given year, including follow-up inspections or inspections in response to a hotline call, those inspections may be counted toward the 20 percent requirement. Drive-by inspections can be counted toward the 20 percent requirement.

All inventoried facilities will be inspected at least once within the Municipal Permit term. High priority facilities will likely be inspected more than once within the Municipal Permit term. Facilities will also be inspected in response to valid public complaints.

Based upon inspection findings, the City will implement all follow-up actions (i.e., education and outreach, follow-up inspections, enforcement) necessary to require and confirm a facility's return to compliance with the City's minimum BMP requirements. Enforcement actions are discussed in Section 6.5 and in the City's Enforcement Response Plan (Appendix C).

6.4.2 Inspection Data Management

A Storm Water Facilities Inspection Form is filled out for each inspection and a copy is provided to the business operator. All inspections and re-inspections are retained in a business specific file. In addition, all inspection data for inventoried industrial and commercial facilities is tracked in a spreadsheet and will be made available to RWQCB staff upon request.

At a minimum, inspection records will include:

- Name and location of facility or area (address and hydrologic subarea (HSA)) consistent

with the inventory name and location.

- Inspection and re-inspection date(s).
- Inspection method (i.e., individual business, property-based, or drive-by).
- Observations and findings from the inspection(s).

For onsite inspections, the records will also include the following:

- Description of any problems or violations found during the inspection(s).
- Description of enforcement actions issued in accordance with the Enforcement Response Plan (Appendix C).
- The date problems or violations were resolved.

6.4.3 Inspection Methods Overview

Inspections of industrial and commercial facilities are performed by storm water and/or code compliance staff or contractors. Note that while contract staff may be used to complete inspections, only City staff may issue enforcement actions like Notices of Violation (NOVs) and citations. Inspections of facilities include onsite individual business, property-based, or drive-by inspections and are summarized in the following sections.

An inspection is typically initiated as a result of one of the following:

- An inspection is necessary to meet the inspection frequency requirements of the Municipal Permit, as described in Section 6.4.1.
- To investigate a potential illegal discharge as reported through the City's Hotline or based on outfall monitoring.
- As a follow up to a previous inspection during which a violation was noted.

Previous facility inspection results are archived by business and are available for review prior to conducting new inspections.

6.4.3.1 Onsite Individual Business & Property-based Inspections

Both individual business and property inspections may be completed as part of the City's industrial and commercial inspection program. As presented in the San Diego River WQIP, the City will work to implement a "complete property" inspection program. "Complete properties" that are determined to be likely sources of bacteria will be inspected using the property-based approach. "Complete properties" include a grouping of parcels, or a single parcel, on which more than one business is intended to operate, and whose common areas are generally managed by a single entity, such as a property owner, manager, or owner's association. Aside from this focus on "complete properties" to target bacteria as described in the WQIP, all other

inspections will be individual business inspections. Inspections will be documented using the Storm Water Facility Inspection Form.

Where property inspections are conducted, individual business inspections may also conducted if contact with the individual business is required to determine BMP compliance or resolve deficiencies. This method ensures that all responsible parties are notified of the required corrections.

Onsite inspections include the following components:

- Visual inspection for the presence of non-storm water discharges, actual or potential discharges of pollutants, and actual or potential illegal connections.
- Determining whether description of the facility or area in the inventory has changed, and making corresponding updates if necessary.
- Assessment of the implementation of applicable minimum BMPs, including preventing non-storm water discharges as required by the Storm Water Ordinance.
- Review of onsite documentation (facility map, facility BMP plan, training records, and inspection records)
- Verification of coverage under the IGP, when applicable.

The inspector attempts to obtain information from the facility representative or other responsible individual at the time of the inspection. If requested information is not available for review at the time of the inspection, the inspector may request the submittal by of said documents via mail or email. During the site walkthrough, areas in which pollutant sources and pollutant-generating activities are exposed to direct precipitation, storm water run-on and run-off, or non-storm water discharges will be assessed. Inspectors will evaluate the effectiveness of the business' actions to determine if they comply with the City's BMP requirements. Inspectors also look for evidence of illegal discharges, such as ongoing leaks or recent spills, or discharges/connections not authorized under an NPDES permit.

At the conclusion of the inspection, the facility representative and/or the responsible party is provided a copy of the Storm Water Facility Inspection report for their records.

6.4.3.2 Drive-by Inspections

Drive-by inspections will include the following components:

- Visual inspection for the presence of non-storm water discharges, actual or potential discharges of pollutants, and actual or potential illegal connections.
- Determining whether description of the facility or area in the inventory has changed, and making corresponding updates if necessary.

Drive-by inspections are more time-efficient than onsite inspections. Their use can allow the City to oversee a large area in a comparatively short amount of time. If the City determines that the drive-by inspection method is effective in evaluating BMP implementation at businesses, the City may conduct drive-by inspections at standard priority businesses. These inspections can be counted towards the Municipal Permit requirement to inspect all businesses at least once every five years.

The main focus for drive-by inspections is observe any discharge points of a facility or property for evidence of non-storm water discharges. The results of a drive-by inspection will typically be documented by completing the discharge-related questions on the Storm Water Facility Inspection Form. If non-storm water discharges are identified, the inspector will determine if an onsite inspection is warranted. Whenever an illegal discharge is identified, the responsible party is contacted, and the illegal discharge is required to be eliminated.

6.4.3.3 Mobile Business Inspections

Mobile businesses are subject to the same prohibitions and enforcement mechanisms as stationary industrial and commercial facilities. However, mobile businesses are inspected by the City on an as-needed basis. Triggers for these inspections are expected to be in response to incident reports received via the City's Hotline and direct visual observations by City staff or members of the public.

6.5 Enforcement

Through legal authority outlined in Santee's Municipal Code and the procedures outlined in the Enforcement Response Plan (Appendix C), the City has the ability to issue enforcement actions for industrial and commercial facilities that are out of compliance with the City's storm water requirements. Industrial and commercial facilities are typically provided the opportunity to correct any BMP deficiencies or violations prior to initiating escalated enforcement action, such as issuing a Notice of Violation and/or an administrative citation. The Enforcement Response Plan provides more details about the City's enforcement tools and process.

Consistent with Municipal Permit requirements, all deficiencies will be corrected within 30 calendar days of the time the violations were discovered or, where possible, prior to the next rain event, whichever is sooner. A corrective action response time frame is set at the time of the inspection, and included on the inspection form. The inspector then sets an Outlook calendar reminder of the due date to ensure that a corrective action response is received. When a violation cannot be resolved within 30 days, the City will require that a corrective action plan be developed and implemented which demonstrates progress toward a return to compliance. This documentation will accompany a narrative which describes the reasons for which the

deficiencies required additional time to complete. All inspection data, including the resolution and timelines, are tracked in a spreadsheet.

6.5.1 Identification of Industrial Non-filers

The City of Santee will notify the San Diego Water Board when an inspector identifies a facility that is required to obtain coverage under the IGP and fails to do so, within five calendar days from the time the City becomes aware of the circumstances. Such "non-filers" may be identified based on comparing the City's list of industrial facilities, as identified by SIC codes listed in the IGP, with the facilities listed on the State's Storm Water Multiple Application and Reporting System (SMARTS) website (https://smarts.waterboards.ca.gov) as having filed for coverage or exemption. Non-filers also may be identified in the field based on inspection results. Written notification will be provided by email to Nonfilers_R9@waterboards.ca.gov.

Table 6-2. Potential Pollutants at Industrial and Commercial Facilities

Category	Heavy Metals[2]	Organics	Oil & Grease[2]	Sediment	Pesticides	Nutrients	Oxygen Demanding	Bacteria/ Viruses	Trash & Debris
Aggregates	PO	UL	UL	L	UL	UL	PO	UL	UL
Air Transit	PO	PO	PO	PO	UL	UL	UL	UL	UL
Airplane Repair	L	L	L	PO	UL	UL	PO	UL	PO
Animal Facilities	UL	UL	UL	PO	UL	L	L	L	PO
Auto Paint/Body	L	L	PO	PO	UL	UL	PO	UL	PO
Auto Repair	L	L	L	PO	UL	UL	PO	UL	PO
Boat Repair	L	L	L	PO	UL	UL	PO	UL	PO
Botanical/Zoological Exhibits	UL	PO	UL	PO	L	L	PO	L	PO
Building Materials	PO	UL	PO	L	PO	PO	PO	UL	L
Carpet/Furniture Cleaning	UL	PO	UL	PO	UL	UL	PO	UL	PO
Cement Mixing/Cutting	UL	UL	PO	L	UL	UL	PO	UL	PO
Cemeteries	UL	UL	UL	PO	L	L	PO	PO	PO
Eating/Drinking Establishments	UL	UL	L	PO	UL	UL	L	L	L
Equipment Repair	L	L	L	PO	UL	UL	PO	UL	PO
Fueling	L	L	L	PO	UL	UL	PO	UL	PO
Golf courses/Parks	UL	UL	UL	PO	L	L	PO	PO	PO
Ground Transportation	L	PO	L	PO	UL	UL	PO	UL	PO
Landfills	PO	PO	PO	L	PO	PO	L	L	L
Landscaping	UL	PO	UL	PO	L	L	PO	UL	PO
Manufacturing, Biotech/Pharmaceutical	UL	PO	UL	PO	UL	UL	PO	UL	PO
Manufacturing, Chemicals	UL	PO	PO	PO	PO	UL	PO	UL	PO
Manufacturing, Concrete	PO	UL	PO	L	UL	UL	PO	UL	PO

Table 6-2. Potential Pollutants at Industrial and Commercial Facilities

Category	Heavy Metals[2]	Organics	Oil & Grease[2]	Sediment	Pesticides	Nutrients	Oxygen Demanding	Bacteria/ Viruses	Trash & Debris
Manufacturing, Electronics	PO	UL	PO	PO	UL	UL	PO	UL	PO
Manufacturing, Equipment	PO	UL	PO	PO	UL	UL	PO	UL	PO
Manufacturing, Fabric/Clothes	UL	UL	UL	PO	UL	UL	PO	PO	PO
Manufacturing, Fabricated Metal	L	UL	PO	PO	UL	UL	PO	UL	PO
Manufacturing, Food/Drink	UL	UL	PO	PO	UL	UL	PO	L	PO
Manufacturing, Misc.	PO	PO	PO	PO	UL	UL	PO	UL	PO
Manufacturing, Paper	UL	UL	UL	PO	UL	UL	PO	PO	PO
Manufacturing, Plastic/Rubber	UL	PO	PO	PO	UL	UL	PO	UL	PO
Manufacturing, Primary Metal	L	UL	PO	PO	UL	UL	PO	UL	PO
Manufacturing, Stone/Glass	UL	UL	UL	L	UL	UL	PO	UL	PO
Manufacturing, Structural Steel	L	UL	UL	PO	UL	UL	PO	UL	PO
Manufacturing, Wood/Furniture	UL	UL	UL	PO	UL	UL	PO	PO	PO
Marinas	L	PO	L	PO	UL	UL	PO	PO	PO
Masonry	UL	UL	PO	L	UL	UL	PO	UL	PO
Nurseries/Greenhouses	UL	PO	UL	L	L	L	PO	PO	PO
Other Contractor	PO	PO	PO	PO	UL	UL	PO	UL	PO
Other Recreation	UL	UL	UL	UL	UL	UL	PO	PO	L
Painting/Coating	PO	PO	PO	PO	UL	UL	PO	UL	PO
Pest Control	PO	PO	UL	PO	L	UL	PO	UL	PO
Pool/Fountain Cleaning	UL	UL	UL	PO	UL	UL	UL	UL	UL
Portable Sanitation	UL	PO	PO	PO	UL	L	PO	L	PO
Publically Owned Treatment Works	PO	UL	UL	PO	UL	PO	L	UL	PO

Table 6-2. Potential Pollutants at Industrial and Commercial Facilities

Category	Heavy Metals[2]	Organics	Oil & Grease[2]	Sediment	Pesticides	Nutrients	Oxygen Demanding	Bacteria/ Viruses	Trash & Debris
Power Generation	PO	PO	PO	L	UL	UL	UL	UL	UL
Power Washing	PO	PO	PO	PO	UL	UL	UL	UL	UL
Printing	PO	PO	UL	PO	UL	UL	PO	PO	PO
Recycling	L	PO	PO	L	PO	PO	PO	UL	PO
Sewage Sludge	PO	PO	PO	PO	PO	L	L	L	PO
Vehicle Parking/Storage	L	L	L	L	UL	UL	PO	UL	PO
Vehicle Washing	PO	L	PO	PO	UL	UL	PO	UL	PO
Vehicle/Equipment Rental	L	UL	L	PO	UL	UL	PO	UL	PO
Waste Management	PO	PO	PO	L	UL	PO	L	L	L
Water Transit	PO	L	PO	PO	UL	PO	PO	PO	PO
Wholesale Food	UL	UL	PO	PO	UL	UL	L	PO	PO
Wholesale/Storage/Warehousing	UL	UL	PO	PO	UL	UL	PO	PO	PO

Notes: L = Likely, PO = Possible, UL= Unlikely

[1] This table is used to assign initial pollutant discharge potential prior to inspections. This table is based on tables in the Copermittees' Baseline Long-Term Effectiveness Assessment (County of San Diego, 2011) and on the field experience of D-MAX Engineering, Inc.. D-MAX Engineering, Inc. has conducted more than 24,000 industrial and commercial facility inspections during which pollutant discharge potentials were assessed.

[2] Discharge of heavy metals and oil and grease is possible if the facility has on-site parking.

7 Municipal Facilities

7.1 Introduction

The City owns, operates, and maintains a number of facilities including public parks, trail systems, administration buildings, an operations facility, and several fire stations. Additionally, the City owns and maintains all public roads, right of ways, easements, landscape maintenance districts, and the storm water conveyance system. Activities associated with these facilities, such as routine repair and maintenance of streets and sidewalks, buildings, graffiti removal, and fleet management are described in Section 8.

7.2 Municipal Inventory

The City maintains and updates, at least annually, the municipal facilities inventory. Each facility is evaluated for its potential to contribute pollutants and non-storm water discharges to the City's storm water conveyance system. The inventory includes the following information, where applicable:

1. Name and location (address and HSA).
2. Facility description.
3. Identification of pollutants generated and potentially generated by the facility or area.
4. Whether the facility or area is within 200 feet of an ESA or 303(d) waterway.
5. Whether the facility or area is tributary to and within the same HSA as a water body segment listed as impaired on the 303(d) list and generates pollutants for which the water body segment is impaired.
6. A current map showing the location of municipal facilities, watershed boundaries, and water bodies.

Further information regarding fixed municipal facilities is included in the following sections.

7.2.1 Fixed Facilities

Parks and Recreational Facilities

The City maintains a number of parks, landscaped areas, and other recreational areas for use by the general public. Recreational facilities are defined as facilities that support outdoor activities such as sports fields. The Public Services Division, and/or their contractors, are responsible for park maintenance activities such as landscaping, waste removal, and the maintenance of any facilities on the grounds of the park such as restrooms, facilities that support concessions, or

other ancillary structures. The Public Services Division is also responsible for the maintenance of storm water conveyance systems, inlet filters, swales, and other TCBMPs which may be located on the property.

Public Works Operational Yard

The City maintains one public works yard which supports the activities of the City's Public Services Division and includes storage and maintenance areas.

Fleet Maintenance

City vehicles are maintained at a maintenance facility located at Fire Station 4. General routine maintenance and tune-ups are performed at this facility. Vehicles requiring more advanced services or repairs are sent to a private repair shop. Vehicles are fueled off site, at a private gas station.

Fire Station Facilities

Firefighting capability is an essential element of municipal activities conducted in the City. Firefighting exercises are conducted both at a training facility (located in El Cajon), and during non-emergency and emergency fire fighting activities in the field. Other fire department related activities include equipment maintenance. Fire personnel will continue to be trained on how to implement BMPs during training, non-emergency, and emergency firefighting activities.

Other Stationary Facilities

The City maintains a number of public buildings such as the administrative buildings at City Hall, and the three community activity centers that do not fall into any of the aforementioned categories. The City implements pollution prevention methods and BMPs to reduce or eliminate the pollutants generated at these facilities.

Wastewater and Water Supply Facilities – Padre Dam Municipal Water District (PDMWD)

The City of Santee does not provide water or wastewater services. PDMWD provides the infrastructure for the potable and recycled water supplies, and the infrastructure for the collection and transmission of wastewater. PDMWD's system includes a network of pipelines, pump stations and recycled water treatment ponds which are a part of Santee Lakes Regional Park and are utilized for recreation.

7.2.2 Special Events

The City of Santee hosts a number of special events in the City which typically include festivals, fairs, summer concerts, run/walks, and other events. Special events have the potential to generate trash and litter among other activity specific pollutants that may be associated with the special event.

The City has developed pre- and post- event BMPs that are required to be implemented at all City sponsored special events, which target reducing potential sources of bacteria, the San

Diego River's HPWQC. The BMPs listed in Section 7.3.2 are implemented during and/or after special events, where applicable. Some potential pollutants associated with special events include:

- Trash
- Food and beverage spills and wastes
- Oil, grease, and fuel (cooking, generators, and/or carnival rides)
- Leaks or spills from portable restrooms or hand wash stations

7.3 Best Management Practice Requirements

The implementation, operation, and maintenance of BMPs by municipal facilities are required by the City in order to prevent pollutants from entering its storm water conveyance system. The City has designated a list of minimum BMP requirements for all municipal facilities and activities; collectively, the BMPs are listed in the City's Guidelines for Surface Water Pollution Prevention (Appendix C).

7.3.1 Municipal Facilities

In addition to the minimum BMPs, the City has developed programs to identify, prioritize, and implement potential projects to retrofit areas of existing development and to rehabilitate streams, channels, and habitat. Appendix F of this document describes theses two programs in further detail.

During inspections of facilities that drain to 303(d) listed receiving waters or other ESAs, the City will conduct more detailed investigations into whether the facilities are potential sources of the pollutants of concern or may otherwise negatively impact the ESA.

If a facility is believed to be a significant source of other key pollutants of concern and the standard, minimum BMPs are not adequate, the City will require additional structural or non-structural BMPs so that discharges of the pollutants of concern are reduced to the MEP. The City may also elect to prepare a written BMP plan for the facility.

7.3.2 Special Events

In addition to the applicable minimum BMP requirements listed in the City's Guidelines for Surface Water Pollution Prevention (Appendix C), the City has established the following additional BMP requirements for all special events:

- Protect all storm drain inlets within and adjacent to event area.
- Provide sufficient supply of receptacles for waste management and recycling located throughout the event, with manual sweeps for renegade/fly away litter and debris.

- Provide adequate spill kits and secondary containment for liquid storage (including portable toilets).
- Perform street sweeping following the special event.
- Other activity specific BMPs and additional BMPs will be considered and implemented where applicable, and include, but are not limited to the following:
    - Steam cleaning of paved areas if necessary to clean liquid waste, particularly food and beverage waste.
    - Providing temporary screens, or barriers (pre-event).
    - Cleaning catch basins and inlets post-event.

7.4 Best Management Practice Implementation

The City conducts inspections of its inventoried municipal facilities to prevent the discharge of pollutants in storm water, and ensure compliance with the minimum BMPs and all storm water regulations.

7.4.1 Inspection Purpose

Inspections of facilities include visual observations for the presence of non-stormwater discharges, actual or potential discharges of pollutants, actual or potential illicit connections, and verification that the description of the facility or area in the inventory has not changed. Onsite inspections will also include, at a minimum:

- An assessment of compliance with applicable local ordinances and permits related to non-storm water and storm water discharges and runoff.
- An assessment of the effectiveness of minimum BMPs as outlined in the City's Guidelines for Surface Water Pollution Prevention.

7.4.2 Inspection Frequency

Unlike the 2007 Municipal Permit, the new Municipal Permit does not specifically require the prioritization of municipal facilities. However, Section E.5.c.(1)(a) of the Municipal Permit requires that inspections are performed at an appropriate frequency to confirm that BMPs are implemented. Inspections should evaluate that BMPs are designed to reduce the discharge of pollutants to the storm water conveyance system to the MEP and are effective in reducing non-storm water discharges to the storm water conveyance system.

The inspection frequencies are required to take into consideration the potential for a facility or area to produce a non-storm water discharge and should reflect the priorities outlined in the San Diego River WQIP. In order to ensure municipal facilities are inspected at an appropriate

frequency in accordance with the Municipal Permit, the City will prioritize municipal facilities for inspections as either "high" or "standard" priority. The priority assigned to each facility considers the factors listed below.

Municipal facilities that are found to be, or are likely to be, a significant source of bacteria, the HPWQC for the San Diego River WMA, will receive a "high" priority, while all others will be "standard" priority. The specific frequencies at which facilities are inspected are discussed below.

In general, the City inspects all high priority municipal facilities annually. Standard priority facilities are inspected at least once within the Permit term, which is expected to be a five-year period. These inspections may be either onsite or drive-by inspections. At a minimum, 20 percent of the City's existing development inventory receives onsite inspections every year. Drive-by inspections may be conducted for standard priority facilities where appropriate. An overview of inspection procedures is included in the following section.

Based upon inspection findings, the City will implement all follow-up actions (i.e. education and outreach, re-inspection, enforcement) necessary to require and confirm compliance with the applicable BMPs, local ordinances, and permits, and in accordance with the Enforcement Response Plan (Appendix B). While routine inspections are one mechanism for ensuring BMPs are implemented at municipal facilities, it is not the only mechanism. If BMP deficiencies are observed outside of an inspection, City staff are trained to address and correct any observed issues, or to report the issue to the appropriate person for correction.

7.4.3 Inspection Data Management

Photos are taken during all onsite inspections, and a photo report is created. Any deficiencies or violations are documented on an inspection form, and a corrective action timeline is provided. The inspection form is then provided to Public Services Division for corrective action response. All inspections are logged into the inspection spreadsheet. This information will be made available to RWQCB staff upon request.

Inspection records will include, at a minimum:

- Name and location of facility or area (address and hydrologic subarea) consistent with the inventory name and location.
- Inspection and re-inspection date(s).
- Inspection method(s) (i.e. onsite, drive-by).
- Observations and findings from the inspection(s).

Records for onsite inspections will also include, as applicable:

- Description of any problems or violations found during the inspection(s).
- Description of enforcement actions issued in accordance with the Enforcement Response Plan.
- The date BMP deficiencies or violations were resolved.

7.4.4 Inspection Procedures

Routine storm water inspections at municipal facilities are conducted by Storm Water Program and/or Code Enforcement staff, and are performed via onsite or drive-by inspection. Facility inspections are the primary mechanisms used to verify implementation of the designated BMPs at municipal facilities and activities. Inspectors will fill out a Storm Water Facility Compliance Report, and provide a copy to the Public Works Division. The goals of the inspections are:

- To ensure that BMPs are properly implemented and maintained, and functioning as intended;
- To ensure the proper implementation of any storm water plans, and;
- To ensure that staff is aware of the stormwater management requirements applicable to the facility.

Inspection information, including any corrective actions, is tracked in the inspection spreadsheet. If deficiencies in BMP implementation are identified, the inspector will document corrective actions required to bring the site/activity into compliance. The corrective actions will be referred to staff in the Public Services Division to complete, and a written corrective action response will be provided to the Storm Water Program which demonstrates a return to compliance.

Any complaints received related to municipal facilities and activities are also investigated by Code Enforcement and/or Storm Water Program staff and are documented in accordance with the procedures detailed in Section 3 of this document.

Inspection Initiation

An inspection is initiated as a result of one of the following:

- A report by the public or a municipal staff member.
- An illicit discharge investigation.
- As a follow up to a previous inspection, violation, or citation.
- The facility is due for a routine inspection.

Pre-Inspection Preparation

The inspector will review all available documentation from previous year's inspections including but not limited to inspection reports, photos, corrective actions, correspondence, etc.

7.4.4.1 Onsite Inspections

The inspector will conduct the inspection along with the facility representative and/or Public Services Division staff. Inspectors will perform the following tasks at the time of the inspection:

- Obtain updated information for the City's inventory.
- Identify which general BMP requirements apply to the facility.
- Interview the facility representative about the non-structural BMPs that are implemented and how they are maintained. Procedural questions are asked to determine how adequate processes are in place since many BMP requirements may be incorporated into operations and may not be evident in a walkthrough.

Inspections will focus on areas where repair or maintenance activities, or materials storage areas are exposed to storm water. Attention will also be given to run-on of storm water and runoff in these areas, as well as pollution prevention measures. From the walkthrough, an inspector can assess the following:

- Accuracy of site map, descriptions of the facility, materials list, and plans.
- Confirmation of additions or changes to facility operations.
- Evidence of discharges (i.e., ongoing leaks or recent spills, or discharges/connections not authorized under an NPDES permit).
- Effectiveness of BMP implementation.

The inspector will fill out an inspection form at the conclusion of the inspection. A duplicate copy of the inspection form is provided to the appropriate Public Services Division staff so that they can address any corrective actions that may be required.

7.4.4.2 Drive-by Inspections

Drive-by inspections of municipal facilities include making observations of the property from the perimeters as accessible by streets / roadways. The main focus of the drive-by inspection is to make observations for discharges and noting any other clearly observable BMP deficiencies; the inspection is not intended to be an in-depth evaluation of all activities that may occur at the site. Results of drive-by inspections will be documented on the City's inspection form. A duplicate copy of the inspection form is provided to the appropriate Public Services Division staff so that they can address any corrective actions that may be required.

7.5 Enforcement

The City enforces its legal authority for all its municipal facilities to achieve compliance in accordance with the Municipal Permit and the Enforcement Response Plan (Appendix B). If any storm water violations are observed during an inspection, the procedure described in the Enforcement Response Plan will be followed to ensure compliance with BMP requirements and other permit requirements. All deficiencies will be corrected within 30 calendar days of the time the violations were discovered or, where possible, prior to the next rain event, whichever is sooner. A corrective action response (CAR) time frame is set at the time of the inspection, and included on the inspection form. The inspector then sets an Outlook calendar reminder of the due date to ensure that a CAR is received. When a violation cannot be resolved within 30 calendar days, the City will require that a corrective action plan be developed and implemented which demonstrates progress toward a return to compliance. This documentation will accompany an explanation as to why corrections required additional time to complete.

8 Municipal Infrastructure

8.1 Introduction

The City of Santee has developed a comprehensive program designed to reduce the amount of pollutants that are transported via runoff from municipal activities. The City conducts mobile activities such as street and sidewalk repair, painting, and graffiti removal. Other prominent activities include street sweeping, inspections of municipal facilities, storm water conveyance system maintenance, and landscape maintenance.

In accordance with Section E.5.b.(1)(c) of the Permit, this section describes the operation and maintenance of municipal facilities which is the primary mechanism for reducing discharges of pollutants into the storm water conveyance systems. Implementing pollution prevention techniques and other BMPs are often the most cost effective and simple solution to reduce pollution at the source and prevent costly remediation efforts. Section 7 discusses BMP implementation, and inspection procedures for stationary municipal facilities.

8.2 Roads, Streets, Highways, and Parking Facilities

8.2.1 Background

Roads, streets, highways, and parking facilities are an integral part of any City. These facilities collect a variety of pollutants due to routine vehicle use and also have a tendency to collect litter and debris from neighboring areas and activities. Regular maintenance of these facilities is necessary to minimize the potential for pollutants from mobilizing through the storm water conveyance systems. In addition, capital improvements and maintenance activities such as repairing, resurfacing, or constructing new roads, may also contribute pollutants via the storm water conveyance system. All construction-related activities conducted by or on behalf of the City are conducted as described in Section 5.

Parking facilities that are associated with a municipal facility are included in regular maintenance activities of the associated municipal facility. The City does not maintain any stand-alone parking facilities.

8.2.2 Street Sweeping

The City continues to maintain an aggressive sweeping schedule to reduce the pollutant load attributed to roads, streets, highways, and parking facilities in the City to the MEP.

For the purposes of the street sweeping program, the terms high, medium, and low are used only to classify or rank the streets with relation to each other, but do not qualify the streets as

generating significant or non-significant amounts of trash and debris. Since the new Permit does not set a minimum requirement for street sweeping, the City has chosen to utilize the street sweeping requirements from the 2007 Permit as a baseline. Table 8-1 shows the sweeping frequencies for the roads, streets, and highways within the City.

Table 8-1. Sweeping Frequencies for Roads, Streets, and Highways

Priority	Description[1]	Sweeping Frequency
High	High traffic, high pollutant load	Bi-Monthly
Medium	Medium traffic, medium pollutant load	Monthly
Low	Low traffic, low pollutant load	As needed, at least annually

[1] Determined by traffic counts, street sweeping reports, and routine observation.

8.2.3 Best Management Practices

The City implements all BMPs as described in the Guidelines for Surface Water Pollution Prevention (Appendix C) while performing roads, streets, and highways maintenance. Street sweeping and cleaning continues to be the main BMP that is implemented for these facilities.

The City of Santee employs the service of a private contractor to conduct street sweeping of all City streets at the frequencies outlined in Table 8-1. All streets may receive an extra sweeping upon request. Days missed due to holidays or other unforeseen circumstances are made up within two days. All contractors that work for the City are required to implement activity-appropriate BMPs and to prevent discharges into the storm water conveyance system. Street sweeping is an important activity for the City, as it keeps the City clean, prevents blockages of the storm drain inlets and pipes, provides the City with additional eyes on the conveyances, and enables more frequent observations, which would thereby lead to early observation and quicker responses to IC/IDs.

The City maintains publicly owned unpaved parking lots, driveways, walkways, and yards by implementing appropriate controls to prevent erosion. Unpaved areas stabilized utilizing gravel, vegetation, structural controls, or other equivalent measures. In the event that any pervious areas are disturbed or otherwise become destabilized, temporary cover and containment measure are implemented, in addition to erosion and sediment controls. These temporary BMPs are routinely monitored and maintained until the area can be permanently stabilized.

8.3 Storm Water Conveyance System Operation and Maintenance

8.3.1 Background

The primary function of the storm water conveyance system is to collect and transport surface runoff to receiving waters during storms in order to prevent flooding. In order to reduce the

transportation of pollutants into receiving water bodies, the City of Santee will continue to regularly maintain its MS4 to ensure that it remains both fully functional and free of pollutants to the MEP. As defined by the City's Storm Water Ordinance, the City's storm water conveyance system is defined as the conveyance or system of conveyances, public or private, by which water may be collected and conveyed, including but not limited to roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains. The point where the City's system meets, or outfalls, to a waterway is also considered a conveyance and a water of the State.

The City's Public Services Division is responsible for the maintenance of the City owned treatment control BMPs such as filter inserts, inlet baskets, detention basins, bioswales, and a storm water filtration chamber. The City's storm water conveyance system, as one complete entity, is shown on the storm water conveyance system (MS4) map located in Appendix D. The management of the City's storm water conveyance system includes responding to complaints received by the City's Reporting Hotline, detecting and eliminating IC/IDs, inspecting and maintaining MS4s by cleaning, removing sediment, debris, and excessive vegetation, vacuuming/ flushing the pipes, repairing and/or replacing damaged or failing structures, and by labeling storm drain inlets.

8.3.2 Maintenance

The City maintains a comprehensive maintenance schedule and assesses the storm water conveyance system procedures and findings on a regular basis to ensure proper maintenance. In accordance with the Municipal Permit, the City's current inspections is sufficient in ensuring that catch basins, inlets, and pipes are sufficiently maintained.

Routine maintenance needs will be conducted on an as needed basis, and prioritized based on threat to water quality, proximity to waterways, mapped pollutant hot spots, and environmentally sensitive areas. In addition, City departments work collaboratively to identify and address problems proactively. The City's MS4 maintenance schedule, in accordance with the City's jurisdictional strategies listed in the San Diego River WQIP, is as follows:

- Prioritized MS4 cleaning program based on land use density and traffic flows.
- All high and medium priority hardened conveyances are inspected and cleaned annually.
- All low priority hardened conveyances are inspected at least once per year, and cleaned if conditions warrant.
- Storm water conveyances that the City has identified as gathering a greater amount of trash and debris as compared to other areas of the City are re-inspected throughout the

year and cleaned on a more frequent schedule if necessary. Cleaning and inspection schedules are subject to change based on observations and records of City personnel.

- Non-emergency and emergency repairs, maintenance, and construction of storm water conveyance systems are conducted on an as needed basis.

Open channels, creeks, rivers, and streams will be cleaned of observed anthropogenic litter in a timely manner. The City, in partnership with the Sheriffs, performs river sweeps (on-foot / bicycle observation and field investigation). The primary purpose of the sweep is to identify illegal dumping associated with river encampments. The Public Services Division and the Sheriff's Crime Prevention Unit identify problem areas/hot spots where encampments and trash are observed or reported. The Sheriff's Crime Prevention Unit serves eviction notices where necessary, after which the Public Services Division will perform the appropriate clean-up.

Maintenance of the hardened storm water conveyance system is divided into two main categories. The first includes above ground facilities, such as open channels, street gutters and storm water treatment facilities. The second category comprises below ground facilities, such as catch basins, inlets, and pipelines. The maintenance procedures for these two categories are different due to access issues. The following is a description of the City's maintenance program for each of these two categories.

Above Ground Maintenance

Maintenance of the above ground storm water conveyance system primarily includes cleaning of rock lined channels, concrete channels, and brow ditches. Routine inspection of above ground facilities is performed between May 1 and September 30 of each year. Debris removed from the above ground storm water conveyance system is transported to the City's municipal yard and placed into dumpsters for proper disposal by Waste Management, the City's waste hauler. City personnel make sure to handle materials and waste removed during maintenance activities in a manner that will not release the material to the storm water conveyance system, or in any other way contaminate storm water runoff.

Below Ground Maintenance

The below ground maintenance program consists primarily of cleaning inlets, catch basins, and pipelines. Storm drain facilities are inspected and cleaned if inspections find trash, debris, or other material that should be removed. Cleaning is performed using a catch basin cleaning truck (Vactor) that utilizes a water recovery and vacuum unit so that disturbed sediment and debris is fully captured and can be disposed of properly.

Routine inspection and cleaning of underground facilities is performed between May 1 and September 30 of each year, with additional cleaning performed between October 1 and April 30, if necessary. Debris removed from the below ground storm water conveyance system is

transported to the City's municipal yard and transferred into dumpsters for proper disposal by Waste Management, the City's waste hauler.

City personnel handle waste removed during maintenance activities in a manner that will not release the material to the storm water conveyance system. The City will keep records to document maintenance activities and should contain the following information:

- Dates of inspections
- Items inspected
- Locations of facilities inspected or cleaned
- Overall amount of material removed (estimated in either volume or dry weight)
- Disposal site
- Problems noted
- IC/IDs detected
- Corrective action required
- Date corrective action was taken

8.3.3 Best Management Practices

As previously described, the City uses a Vactor truck to remove both dry and liquid debris from catch basins and inlets. In addition, City staff refers to the Guidelines for Surface Water Pollution Prevention to select and implement activity specific BMPs. BMPs are designed to prevent waste from entering the storm water conveyance system and ensure that waste does not re-enter the system. If the City finds that certain portions of the storm water conveyance system itself are contributing pollutants of concern to 303(d) listed water bodies or ESAs, additional BMPs will be implemented as necessary.

In addition, the City will continue to train field staff on implementing BMPs, routinely inspecting and maintaining equipment, and the procedures that are followed for regular maintenance and emergency maintenance and/or discharge control.

In close partnership with PDMWD, the City coordinates to address sewer backups, broken mains, line flushing, proper wastewater disposal, and the Fats Oils and Grease program for food establishments. The City responds to reports made by PDMWD, citizens, and/ or municipal personnel regarding areas that require inspection/cleaning that is above and beyond regular maintenance activities.

A long term preventative maintenance plan is in place to prevent system failures, seepages, and the mobilization of pollutants. This program includes a routine inspection, rehabilitation, or replacement of storm drain pipes, inlets, and associated facilities. In 2012, the City hired RBF Consultants to evaluate and assess the replacement needs of all corrugated metal pipe (CMP). The citywide CMP Assessment Report created a prioritization schedule for which implementation began in 2015. All CMP within the City will either be replaced with reinforced

concrete pipe, or relined with cast in place pipe material. In addition, the City requires that all new storm drain systems be reinforced concrete pipe.

8.4 Landscape Maintenance

The City has developed and continues to implement a program aimed at preventing landscape debris, irrigation runoff, and chemicals (pesticides, herbicides, and fertilizers) from entering the storm water conveyance system. Both the Public Services Division and City contractors implement landscaping and waste management BMPs at all municipally owned and/or operated facilities. In addition, patrons of City parks, trails, and facilities are encouraged to recycle, and properly dispose of trash and pet waste.

8.4.1 Best Management Practices

The City's Public Services Division regularly inspects landscape irrigation systems for system failures and overspray. Sprinkler spray heads are adjusted to direct water to the target area, and any system failures/leaks are isolated and shut off until repairs can be made. Runoff is reduced by proper irrigation programming, including using shorter irrigation cycle times at a higher frequency instead of single long cycles. Sprinklers are also adjusted to eliminate overspray. The City has installed drip irrigation at City Hall, and is in the process of converting existing systems to drip irrigation and weather based sensors in all City owned and/or operated facilities as time and funding permits. Low water use vegetation is being incorporated into existing landscaping in a phased approach, while all new landscape is based on a low water use, California friendly plant pallet. Landscaped medians are also in the process of being transitioned to low water use plants. The City continues to annually budget for turf to be removed from landscaped medians, and artificial turf placed at sports fields. These measures will help reduce the need for chemical input and frequent irrigation.

Since pesticides, herbicides, and fertilizers can be easily mobilized by rain or irrigation runoff and discharged to the storm water conveyance system, the City strives to utilize Integrated Pest Management Techniques. In addition, many of the City's landscaped areas are already transitioned to low water use, California friendly plants which not only require less water and maintenance, but they also require less chemical input.

The federal Pesticide, Fungicide and Rodenticide Act and California Title 3, Division 6, Pesticides and Pest Control Operations place strict controls over pesticide application and handling. This Act also specifies training, annual refresher, and testing requirements. The regulations are updated regularly and generally include a list of approved pesticides and selected uses; general application information; equipment use and maintenance procedures; and record keeping. The California Department of Pesticide Regulations and the County Agricultural Commission coordinate and maintain the licensing and certification programs. In

addition to the City's Guidelines for Surface Water Pollution Prevention, the following BMPs will be implemented to reduce pollutants from pesticides, herbicides and fertilizers:

- Pest control contractors working for the City are supervised by a Qualified Applicator Licensee who has a current Qualified Applicator Certificate.
- Every two years, Qualified Applicator Certificate holders must provide the City proof that they have secured a minimum of 20 hours of continuing education.
- City staff and/or contractors record the applications of all chemical agents by noting the locations, type and quantity of chemicals used. Monthly reports of pesticide usage are prepared and submitted to the Department of Agriculture.
- The Qualified Applicator Certificate holder conducts monthly inspections to monitor storage, handling, and disposal of the pesticides.
- Personnel who participate in the application of herbicides for the City are trained and follow guidelines set by the County Agricultural Commission.
- Runoff is reduced by proper irrigation programming, including the use of smart irrigation systems and turning irrigation off for 72 hours following the application of fertilizers and pesticides.
- Employees are trained to follow pesticide, herbicide and fertilizer labels, and the material safety data sheet(s).
- All federal, state and local regulations are followed in the use of pesticides, herbicides and fertilizers.
- Pesticides, herbicides and fertilizers are not applied during or directly prior to storm events, unless the fertilizer is pre-emergence and needs irrigation to enter the top layer of soil. If pre-emergence fertilizer is used, a controlled amount of irrigation is used to ensure no fertilizer runs off.
- Alternative products to control insects, fungi, and weeds are considered for use to minimize the use of pesticides/herbicides.
- Pesticides are not to be sprayed when there is a high possibility of the spray drifting into non-target areas.
- Unused portions of chemicals are disposed of in accordance with the pesticide and fertilizer labels and applicable regulations.

8.5 Mobile Maintenance Activities

8.5.1 Background

The City conducts a number of activities, which are not isolated to a specific location. BMPs are actively implemented during all mobile municipal activities. Routine mobile maintenance activities include the following:

- Street and sidewalk repair
- Street striping
- Waste removal
- Traffic light maintenance
- Painting
- Landscape/right-of-way maintenance
- Graffiti removal

8.5.2 Best Management Practices

City staff implements the City's Guidelines for Surface Water Pollution Prevention during all mobile activities. When subcontractors are utilized to perform these tasks, BMP requirements are included in all contract language. All City personnel involved in mobile activities are trained to identify and eliminate IC/IDs and to report them to Storm Water Program as soon as possible.

If the City determines that mobile municipal activities may be significant sources of pollutants to ESAs, then City staff will work with personnel conducting the activity to make further improvements to BMPs as needed.

9 Residential Management Areas

9.1 Introduction

Approximately 41 percent of the City has a residential land use designation, which includes single-family residences, multi-family residences, and a small portion of other residential areas. Since residential land use comprises a significant area of the City, residential activities can have a considerable effect on the quality of receiving waters. For that reason, the City has further developed and continues to implement multiple activities that aim to reduce non-storm water discharges and pollutant runoff from residential areas.

9.2 Residential Inventory

The City has divided its residential areas into residential management areas (RMAs) as part of the existing development inventory, as required by Municipal Permit. The RMAs are based on drainage basins delineated as part of a drainage master plan. To form RMAs, the basins were edited to remove portions of the City in which no residential development exists and to define the type of evaluation method that applies to each RMA, as discussed in more detail in Section 9.4. Inventoried RMAs are managed and tracked within a spreadsheet and GIS. The residential inventory (Table 9-1) includes the following information, as required by the Municipal Permit:

1. RMA name and HSA.
2. Status of area as active or inactive. Inactive areas include areas on the inventory that may not be accessible for inspection (i.e., under construction or temporarily closured), but should remain on the inventory.
3. Identification if the area is or includes a Common Interest Area (CIA)/Home Owner Association (HOA).
4. Identification of pollutants generated and potentially generated by the area.
5. Whether the area is adjacent to an ESA. "Adjacent to" is defined as being within 200 feet of an ESA. This is in accordance with past procedure and with the most recent definition provided by the RWQCB, which is found in Order No. R9-2007-0001.
6. Whether the area is tributary to and within the same HSA as a water body segment listed as impaired on the Section 303(d) list and generates pollutants for which the water body segment is impaired.

The City maintains a map showing the location of inventoried residential areas, watershed boundaries, and water bodies (Figure 9-1). If RMA boundaries change, the map will be updated

to reflect the changes. The potential pollutants generated listed in the residential inventory are based on the Copermittees' 2011 Long Term Effectiveness Assessment (County of San Diego). Potential pollutants associated with each RMA may be adjusted in the future based on data collected during field evaluations. The CIA and HOA information in the residential inventory included in Table 9-1 has been intentionally left blank, pending further analysis and data collected during future field inspections.

9.3 Best Management Practice Requirements

The City's Guidelines for Surface Water Pollution Prevention describes the minimum BMPs required for residential areas (Appendix C). Residents are required to eliminate or reduce a number of different types of non-storm water discharges and to implement activity specific BMPs to reduce discharges of pollution. Notably, consistent with the Municipal Permit, irrigation runoff, which was previously an allowable discharge under the 2007 Municipal Permit, is now considered an illicit discharge.

9.4 Program Implementation

The City's residential program primarily focuses on addressing the HPWQCs for the San Diego River WMA, as established within the WQIP. At this time, the HPWQC for the San Diego River WMA is bacteria. The main focus of the City's residential program will be reducing non-storm water discharges. Reducing non-storm water discharges is expected to reduce discharges of bacteria from the City's storm water conveyance system to downstream water bodies. It also is consistent with the Municipal Permit's increased emphasis on eliminating non-storm water discharges, including irrigation runoff, and goes hand in hand with water conservation efforts being implemented throughout the region in response to the State's ongoing drought.

The City's RMA program is a newly created effort, initiated to meet Municipal Permit requirements. As the program matures and as regulatory drivers change, the RMA program may also change through an adaptive management process. Inspection, monitoring, hotline calls, and enforcement data will be used to evaluate the effectiveness of the City's residential oversight program in reducing non-storm water discharges to the City's storm water conveyance system. To ensure the required inspection frequencies are being met, Storm Water Program staff routinely reviews and evaluates collected data. Regular program evaluation will also assist in identifying potential gaps in the City's residential oversight program, which will allow the City to refocus or adjust efforts and resources as needed.

9.4.1 Residential Education

Education and outreach is a key mechanism used to increase residents' rates of BMP implementation. In addition to its own programs, the City contributes to regional education programs run collectively by all municipal agencies in San Diego County. This coordination

helps provide uniform messaging across the region. Consistent with the overall residential program emphasis described above, the City's residential outreach efforts will focus on reducing non-storm water discharges, such as irrigation runoff, pavement washing, car washing, and pool maintenance. Other topics, such as home and landscape maintenance, construction, erosion prevention, and pet waste removal are also addressed. Section 10 of the JRMP document, "Education and Public Participation," provides more detail on outreach efforts.

The main method for educating the public and disseminating information is through the City's website, social media, and at community events. The City uses the following means for educational outreach to residents:

- Activity specific storm water / water quality fact sheets that describe pollution prevention and storm drain protection measures
- Storm water-related articles in *Santee Review*
- Promotional materials (e.g., coloring books, calendars, dust pans)
- Community events
- Partnerships with San Diego River Park, YMCA, and Santee School District
- River and community clean-ups
- Trash/recycling collection events
- Region wide mass media campaigns

9.4.2 Oversight Programs and Procedures

BMP implementation within RMAs is assessed via routine storm water conveyance system outfall monitoring and drive-by evaluations, as further described in subsections 9.4.2.1 and 9.4.2.2. These two primary methods will be used to meet the Municipal Permit requirement to evaluate each RMA for compliance with the City's minimum BMPs at least once every five years. Table 9-1 and Figure 9-1 at the end of this section identify which oversight method(s) will be used for each of the City's RMAs. Results from oversight programs will be used to help refine educational efforts, as described in Section 9.4.1, where appropriate. Illicit discharges and connections discovered will be addressed through the City's enforcement process, as described in Section 9.5.

9.4.2.1 Dry Weather Outfall Monitoring

Routine outfall monitoring and identification of the presence of non-storm water discharges by City staff is a primary mechanism for overseeing RMAs and detecting discharges to the City's storm water conveyance system. When non-storm water flow is observed at an outfall during routine monitoring for the Dry Weather Outfall Monitoring Program, monitoring staff will

investigate upstream areas to see if a flow source can be identified. During these investigations, staff often evaluates upstream residential areas, and these investigations are considered RMA inspections as defined by the Municipal Permit. If an IC/ID is discovered, it will be addressed through the enforcement process described in Section 9.5.

Major outfalls, defined as 36 inches or more, are monitored once or twice per year; those with persistent non-storm water flow will be monitored more frequently. Water quality samples will also be collected for laboratory analyses at selected outfalls with persistent flow. In turn, a larger share of upstream investigation resources will be directed toward identifying and reducing sources of non-storm water flow in areas upstream of these outfalls, including residential areas. When outfalls are dry, indicating a lack of non-storm water discharge, the corresponding RMA is considered inspected. More information about outfall monitoring procedures is included in Section 3.

9.4.2.2 Drive-by Assessments

Drive-by assessments are the other main method of RMA oversight. These assessments, which consist of making observations for non-storm water discharges and actual or potential IC/IDs while driving through neighborhoods or residential complexes, will be completed for the RMAs that do not have associated major outfall monitoring locations. Observed IC/IDs and other violations of the City's Storm Water Ordinance will be documented for tracking and enforcement.

City staff, contractors, or volunteers trained by City staff (e.g., Retired Senior Volunteer Patrol (RSVP) officers) directly engage residents should a violation be observed during the assessment. This contact involves explaining the need to protect water quality by implementing applicable BMPs and eliminating non-storm water discharges. If a responsible party is a property manager or an HOA, City staff will typically attempt to contact the responsible party following the completion of the day's field work. Violations observed in the field that may pose a significant threat to human or environmental health will be addressed immediately.

Drive-by assessments will be conducted once every five years, as required by the Municipal Permit. For RMAs that are not assessed through outfall monitoring, City staff may elect to complete additional inspections for particular areas if higher frequencies of illicit discharges are observed in those areas or they otherwise establish a history of repeated non-compliance. Onsite inspections or assessments may be completed at multi-family residential complexes by City staff. In addition to assessing the presence of non-storm water discharges, onsite assessments also include an assessment of the implementation of the designated residential minimum BMPs as outlined in the City's Guidelines for Surface Water Pollution Prevention (Appendix C).

9.4.2.3 Supplemental Oversight Mechanisms

The City's reporting website, email, and telephone line, described in Section 3, is another mechanism for overseeing RMAs and for reporting residential violations of the City's Storm Water Ordinance. These reporting mechanisms are advertised through various media as part of the City's Education and Public Participation Program.

When violations are observed by staff or are reported to the City, Storm Water Program staff will typically visit the area where the violation was reportedly observed, depending on the nature of the complaint. Normally, evaluation and follow up will only be performed in response to validated complaints. Further information regarding procedures for responding to reports of illicit discharges is provided in Section 3.

The City utilizes additional 'eyes and ears', or staff that is routinely in the field on other assignments, to observe and assess RMAs for the presence of non-storm water discharges. Some examples include:

Street Sweeping – Street sweepers cover a large portion of the City during routine sweeping activities, which provides an opportunity for substantial oversight of the City's RMAs.

Community Services Department – Staff in the Community Services Department frequent residential areas during their routine activities. In the field staff and activities include special events coordinators, landscapers, irrigation specialists, and pubic services (right of way maintenance).

Code Enforcement – Staff is regularly in the field responding to code compliance complaints and often have the opportunity to observe and co-enforce storm water violations.

Engineering Division – Engineers and engineering inspectors are out in the field daily overseeing and inspecting private and public construction projects**.**

Sheriff Community Oriented Policing – The City has a strong relationship with the Santee Sheriff team. Their patrol officers and investigators are in the field daily and often have a good perspective of where problem areas are located. Code enforcement, storm water program, and the sheriff team meet on a monthly basis to discuss reported and observed community concerns.

Retired Senior Volunteer Patrol (RSVP) – The Sheriff Department's RSVP officers assist in providing an increased level of crime prevention within specific geographic boundaries, including residential areas, by providing additional patrolling. This program provides an opportunity for significant oversight of residential areas. Additionally, RSVP officers may assist in performing drive-by assessments of RMAs.

9.5 Enforcement

If storm water violations traced to residential areas are discovered, the procedure described in the City's Enforcement Response Plan (Appendix B) will be followed to ensure compliance with the Municipal Code. Where possible, the City seeks voluntary compliance through one on one engagement and providing guidance directly to residents. Particularly in cases when residents are unaware of new requirements, the City will initially take an educational approach to build a more effective partnership with the community. However, when voluntary compliance is not achieved within reasonable timeframe, escalated enforcement measures, such as courtesy notices/warnings and administrative citations will also be used to bring about compliance.

The City typically seeks to resolve most violations within two weeks of the first observed violation, or prior to the next rain event, whichever is sooner. Where circumstances warrant, additional time may be allowed to achieve a return to compliance within 30 days. However, obvious illicit discharges or connections that may present an immediate threat to the environment or human health must be eliminated as soon as possible, as described in Section 3. The City records all violation information within a spreadsheet which records the status of the incident from the original report or observation through return to compliance. Should a violation not be resolved within 30 days, the rationale for why a longer period was needed to attain compliance will also be recorded, as required by the Municipal Permit.

Table 9-1. Residential Management Areas and Evaluation Methods

Residential Management Area	Hydrologic Subarea(s)	CIA or HOA	Adjacent to ESA	Pollutants Potentially Generated[2]							Evaluation Method	
				Metals	Oil & Grease	Sediment	Nutrients	Bacteria	Dissolved Minerals	Organics	Major Outfall Monitoring (Outfalls Used for Assessment	Drive by Inspection
1	907.12			L	L	L	L	L	L	L		X
2	907.12			L	L	L	L	L	L	L	1278	
3	907.12, 907.13			L	L	L	L	L	L	L		X
4	907.12, 907.13		X	L	L	L	L	L	L	L	I10c, R20a	
5	907.12		X	L	L	L	L	L	L	L	I30a, 1472,1463	
6	907.12, 907.13		X	L	L	L	L	L	L	L	P20f	
7	907.12		X	L	L	L	L	L	L	L	E5g1, G30c, 434, 3081, 3083	
8	907.12			L	L	L	L	L	L	L		X
9	907.12		X	L	L	L	L	L	L	L	Y15e, 1643, 1647, 1930	
10	907.12		X	L	L	L	L	L	L	L	1657, 1662, 1674, 1675, 1678, 1686	
11	907.12			L	L	L	L	L	L	L	V45k	
12	907.13		X	L	L	L	L	L	L	L	3326	
13	907.12		X	L	L	L	L	L	L	L	J25C, J25C2, RCP1, 632, 709, 722, 774, 804, 899, 948, & 1306.	
14	907.12		X	L	L	L	L	L	L	L	A5c, B30c, 396	
15	907.12, 907.13		X	L	L	L	L	L	L	L	T5e, U5c, 3303, 3310, 3317	
16	907.12		X	L	L	L	L	L	L	L	O40b	

Table 9-1. Residential Management Areas and Evaluation Methods (continued)

Residential Management Area	Hydrologic Subarea(s)	CIA or HOA	Adjacent to ESA	Pollutants Potentially Generated[2]							Evaluation Method	
				Metals	Oil & Grease	Sediment	Nutrients	Bacteria	Dissolved Minerals	Organics	Major Outfall Monitoring (Outfalls Used for Assessment	Drive by Inspection
17	907.12		X	L	L	L	L	L	L	L	RCP3	
18	907.12		X	L	L	L	L	L	L	L		X
19	907.12		X	L	L	L	L	L	L	L		X
20	907.12			L	L	L	L	L	L	L		X
21	907.12			L	L	L	L	L	L	L		X
22	907.12		X	L	L	L	L	L	L	L		X
23	907.12	X		L	L	L	L	L	L	L		X
24	907.12	X		L	L	L	L	L	L	L		X
25	907.12	X		L	L	L	L	L	L	L		X
26	907.12	X		L	L	L	L	L	L	L	119, 130	X
27	907.12	X		L	L	L	L	L	L	L		X
28	907.12	X		L	L	L	L	L	L	L	258	
29	907.12			L	L	L	L	L	L	L		X
30	907.12			L	L	L	L	L	L	L		X
31	907.12	X		L	L	L	L	L	L	L		X
32	907.12			L	L	L	L	L	L	L		X

Table 9-1. Residential Management Areas and Evaluation Methods (continued)

Residential Management Area	Hydrologic Subarea(s)	CIA or HOA	Adjacent to ESA	Pollutants Potentially Generated[2]							Evaluation Method	
				Metals	Oil & Grease	Sediment	Nutrients	Bacteria	Dissolved Minerals	Organics	Major Outfall Monitoring (Outfalls Used for Assessment	Drive by Inspection
33	907.12, 907.13	X		L	L	L	L	L	L	L	3086	
34	907.12			L	L	L	L	L	L	L		X
35	907.13			L	L	L	L	L	L	L		X
36	907.13			L	L	L	L	L	L	L	3342	
37	907.13			L	L	L	L	L	L	L		X
38	907.12	X		L	L	L	L	L	L	L	3922	
39	907.13			L	L	L	L	L	L	L		X
40	907.12			L	L	L	L	L	L	L	709	

Notes: CIA = Common Interest Area; ESA = Environmentally Sensitive Area; HOA = Home Owners Association; L = Likely source of pollutant

-All RMAs are within the San Diego River Watershed Management Area and are considered active.

-All RMAs are considered to be tributary to downstream water bodies listed as impaired on the 303(d) list and generating pollutants for which the water body segment is impaired.

[1] Presence of any CIAs and HOAs within each RMA will be determined in the future as RMA evaluations progress. Although mobile home parks may be included within an RMA they are not monitored since they are outside of the City's jurisdiction.

[2] Based on the 2011 Long Term Effectiveness Assessment (County of San Diego).

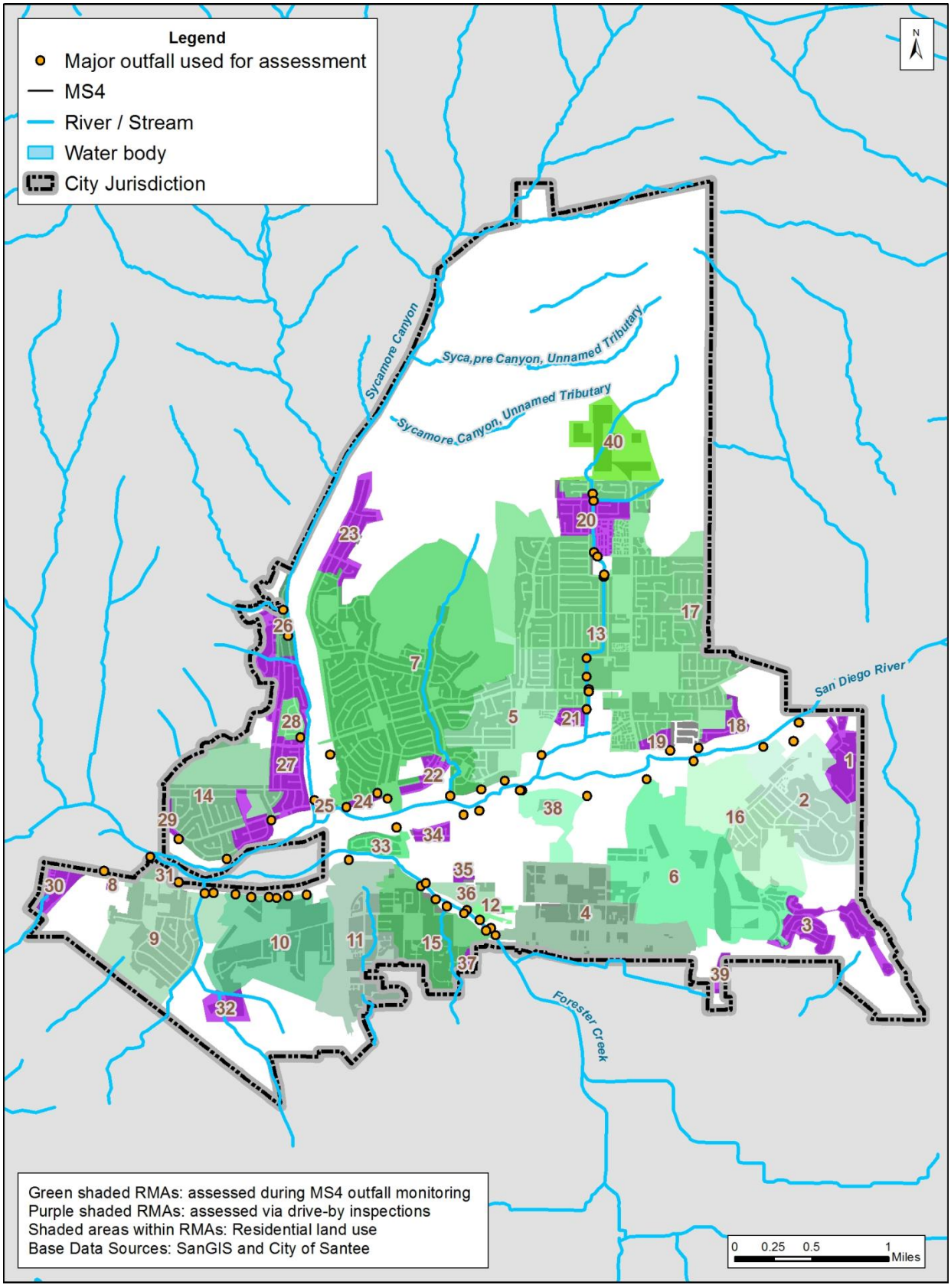


Figure 9-1. Residential Management Areas Map

10 Public Education and Participation

10.1 Introduction

Daily activities can potentially contribute pollution to urban runoff and consequently affect the quality of local waterways. While some individual activities may not have a significant effect on water quality, when considered collectively, they may contribute a significant amount of pollutants to waterways. Water quality is a concern to all, not only because water degradation can have a negative effect on public health and safety, but it can also have a negative impact on the aquatic environment, riparian habitat, tourist and beach oriented economies, property values, and the aesthetic value of the area surrounding the water body.

The City's Storm Water Program includes an education component and a public participation component. The focus of the Storm Water Program is to increase public knowledge about surface water quality and storm water issues, while also offering opportunities for public involvement in the process of reducing pollutants to waterways.

Education is an important step in working towards improving receiving water quality both locally and regionally. By increasing public awareness and encouraging a change in both the attitude and the behavior of the general public and the regulated community, the City may reduce or eliminate storm water pollution caused by common daily activities.

Public participation also plays an important role in achieving the goals of the JRMP. Involving the general public and schoolchildren in the Storm Water Program helps improve storm water awareness among individuals, lead to a renewed appreciation for our precious water resources, and may lead to improved water quality. Collaboration between the City and the community may help foster a sense of shared responsibility in protecting water quality both locally and regionally. The City encourages public participation through the programs discussed in this section. Educational programs and activities are tailored to meet the needs of the following target audiences:

- Municipal departments and personnel
- Construction site operators
- Industrial and commercial owners and operators
- Residential community, general public, and school children
- Other targeted audiences/activities, where applicable

10.2 Municipal Staff Training

The City presents general storm water educational content to all City employees. Some departments will receive additional stormwater related information that is specific to their daily work activities. The City annually updates its municipal staff education program to include information regarding plan review practices, current BMP technologies, and SUSMP/BMP Design Manual requirements for those staff involved in planning, inspections, and code enforcement. The City educates its municipal staff through in house presentations and/or field training sessions, which are presented annually. The City trains municipal personnel on storm water management topics, and the importance of incorporatimg storm water assessments in the first stages of development planning.

The City has prepared Storm Water Fact Sheets, which address activity specific practices that can reduce or eliminate pollution. The fact sheets are made available to all municipal personnel via the City's website.

10.2.1 Development Planning & Construction Activities

The City will continue to offer training so that planning and development review personnel, construction and maintenance crews, building department, code enforcement, grading review personnel, inspectors, and other responsible construction personnel have an understanding of topics related to water quality and storm water pollution prevention and may include:

- Laws, Regulations, Permits, & Requirements
    - Federal, State, and local water quality laws and regulations applicable to development projects
    - Statewide Construction General Permit
    - Statewide General Industrial Permit
    - Regional Board's General NPDES Permit for Ground Water Dewatering
    - Regional Board's 401 Water Quality Certification Program
    - Statewide General NPDES Utility Vault Permit
- General Urban Runoff Concepts
    - Short- and long-term water quality impacts associated with urbanization (i.e., land-use decisions, development)
    - Integration of Low Impact Development (LID) BMP requirements into the local regulatory program(s) and development standards requirements

- Best Management Practices
    - Methods of minimizing impacts to receiving water quality resulting from development, including the following:
        - Storm water quality management plan development and review
        - Methods to control downstream erosion impacts
        - Identification of pollutants of concern
        - LID techniques
        - Source control BMPs
        - Selection of the most effective treatment control BMPs for the pollutants of concern
- Other Topics
    - Water quality awareness for Emergency/First Responders
    - Identifying Illicit Discharges, reporting, and follow up
    - Inspection, plan review, and enforcement policies and procedures to verify consistent application
    - SUSMP/BMP Design Manual requirements including treatment options, LID BMPs, source control, and applicable tracking mechanisms

10.2.2 Industrial/Commercial Activities

The City will provide training for its municipal personnel responsible for conducting stormwater compliance inspections and enforcement of industrial and commercial facilities at least once per year. Training and educational programs include the following topics:

- Laws, Regulations, Permits, & Requirements
    - Statewide General Industrial Permit
    - Municipal Permit
    - Requirements of local municipal permits and ordinances
- General Urban Runoff Concepts
    - BMP types: facility or activity specific, source control, and treatment control
    - How to conduct stormwater inspections and what to look for

- Best Management Practices
- Other Topics
    - Enforcement procedures
    - Non-stormwater discharge prohibitions
    - BMP implementation

10.2.3 Other Activities

Training and educational programs include the following topics where appropriate:

- Laws, Regulations, Permits, & Requirements
- General Urban Runoff Concepts
- Best Management Practices
    - Activity-specific BMPs
- Other Topics

10.3 Educational Outreach

In accordance with Section E.7 of the Municipal Permit and the strategies described in the San Diego River WQIP, the City of Santee will continue to provide a comprehensive storm water education program that will promote and encourage behaviors that reduce storm water pollution. The City aspires to produce notable increases in the knowledge of its target audiences. The City will employ the efforts discussed in this section in an effort to develop sustainable behavior changes in target communities and activities that may contribute watershed pollutants of concern.

The general stormwater education for all target audiences, including municipal personnel, covers the following topics, where appropriate:

- Laws, Regulations, Permits, & Requirements
    - Federal, State, and local water quality laws and regulations
    - Requirements of local municipal permits and ordinances
- General Urban Runoff Concepts
    - Impacts of urban runoff on receiving waters
    - Distinction between the storm water conveyance system and sanitary sewers
    - Non-stormwater discharge prohibitions

- Best Management Practices
    - Pollution prevention and safe alternatives
    - Reduction of pollutants associated with pesticides, herbicides, and fertilizers
    - Good housekeeping practices (e.g., sweeping impervious surfaces instead of hosing)
    - Proper waste disposal (e.g., garbage, pet/animal waste, green waste, household hazardous waste (HHW), appliances, tires, furniture, vehicles, boat/recreational vehicle waste, catch basin/MS4 cleanout waste)
    - Non-stormwater disposal alternatives (e.g., all wash waters)
    - Erosion prevention
    - Preventative maintenance
    - Equipment/vehicle maintenance and repair
    - Spill response, containment, and recovery
    - Recycling
    - BMP maintenance
- Other Topics
    - Water cycle
    - Pollution Prevention
    - Integrated Pest Management techniques
    - Benefits of California native and low water use vegetation
    - Water conservation techniques
    - Low Impact Development strategies
    - Smart Growth and Green Streets
    - Public reporting mechanisms
    - Potable water discharges

10.3.1 Construction Site Operators

Construction site operators can alter the landscape and natural flow of storm water runoff and generally create increased amounts of impervious surface. During such activities, construction site owners, developers, and employees could potentially discharge a number of different types

of pollutants to receiving waters via the storm water conveyance system. It is important that the development and construction community be well informed in order to ensure that BMPs are incorporated during the site design stage, throughout the construction process, and during the post-construction phase to reduce impacts from construction and development.

Activities that may be a high threat to receiving water quality include:

- Land clearing or alteration, resulting in higher erosion rate
- Exposed, disturbed soil
- Material use and storage
- Stock pile management
- Earthwork, demolition, and generation of dust from construction traffic
- Waste management
- Concrete washouts
- Other pollutants (e.g., waste and materials)

Potential impacts of activities:

- Alteration of surface flow and natural drainage patterns
- Scour, erosion and sedimentation
- Pollutant transport
- Water and habitat degradation in receiving waters

The City will continue to educate construction site owners, operators, and developers through all stages of development. In addition, the City requires all parties (contractors, owners, etc.) to be present during a pre-construction meeting. At this meeting, an overview of storm water rules and regulations, minimum best management practices, and documentation is reviewed and handouts are provided.

The following education topics are covered during inspections and developer meetings, where appropriate:

- Laws, Regulations, Permits, & Requirements
    - Statewide General Construction Permit
    - RWQCB General NPDES Permit for Ground Water Dewatering
    - RWQCB 401 Water Quality Certification Program
    - Statewide General NPDES Utility Vault Permit

- General Urban Runoff Concepts
    - BMP types: facility or activity specific, LID, source control, and treatment control
    - Short- and long-term water quality impacts associated with urbanization (e.g. land-use decisions, development, construction)
- Best Management Practices
    - Proper implementation of erosion and sediment control and other BMPs to minimize the impacts to receiving water quality resulting from construction activities
    - Current advancements in BMP technologies
    - Methods of minimizing impacts to receiving water quality resulting from development and construction, including:
        - Stormwater management plan development and review
        - Methods to control downstream erosion impacts
        - Identification of pollutants of concern
        - LID BMP techniques
        - Source control BMPs
        - Selection of the most effective treatment control BMPs for the pollutants of concern
- Other Topics
    - IDDE observations and follow-up during daily work activities
    - Hydrostatic testing

The City will continue to disseminate informational print media, which is made available online and at the City's Department of Development Services counter. In addition, the City provides information to project proponents when applying for Tentative Subdivision Maps, Tentative Parcel Maps, and building permits.

10.3.2 Industrial Facility Operators

Industrial sites include a wide range of businesses, including, but not limited to machining, manufacturing, oil and gas, hazardous waste treatment, landfills, recycling operations, and transportation facilities. Activities from industrial owners and operators can be a high threat to water quality due to the very nature of the industry. Pollutants may be generated from day to

day operations and have the potential to enter storm water runoff if business activities are not conducted properly or without the use of adequate BMPs.

The City will continue to provide an educational program for industrial owners and operators using print media, social media and websites, and workshops targeted to specific businesses. The City plans to continue to collaborate with other municipalities (Copermittees) on business related workshops. The following education topics are included, where appropriate:

- Laws, Regulations, Permits, & Requirements
    - Statewide General Industrial Permit
    - RWQCB General NPDES Permit for Ground Water Dewatering
- General Urban Runoff Concepts
    - BMP types: facility or activity specific, source control, and treatment control
    - Other Topics
    - IDDE observations and follow-up during daily work activities
    - Hydrostatic testing

The City will continue to disseminate informational print media, which is made available at the City's Department of Development Services lobby. In addition, the City makes provides handouts to businesses during inspections and electronic copies are available through the City's website.

10.3.3 Commercial Facility Operators

Commercial sites include a wide range of facilities including, but not limited to, food facilities, gas stations, retail shops, automotive businesses, landscapers, and mobile businesses. Pollutants may be generated from day to day operations at these and other businesses, and have the potential to enter storm water runoff if business activities are not conducted properly or without the use of adequate BMPs.

Information provided to commercial owners and operators addresses the following topics, where appropriate:

- Laws, regulations, permits, & requirements
- General urban runoff concepts
- Best management practices specific to the activity or business type

- Other topics
    - Illicit Discharge Detection and Elimination program observations
    - Follow-up during daily work activities

The City will continue to disseminate informational print media, which is provided to businesses owners and operators during inspections and complaint investigations. Information is also made available at the City's Department of Development Services lobby and on the City's website.

10.3.4 Residential Community, General Public, and School Children

Residential areas make up a large portion of the land use in the City, and therefore even small pollutant discharges add up exponentially and have the potential to harm water quality. Activities such as residential car washing and over irrigation have the potential to contribute pollutants such as heavy metals, detergents, and nutrients to receiving water bodies. Providing residents with appropriate educational materials may help to increase overall awareness, and encourage residents to change harmful behaviors and subsequently reduce the potential for pollutants to enter the storm water conveyance system and reach receiving water bodies.

Community Events and Outreach

Community events and outreach, such as mass media, mailers, door hangers, informational booths at public events, classroom education, field trips, and hands-on experiences are an important part of educating our community on water quality and protecting our natural resources. Such efforts have the ability to improve local water quality by encouraging people to make a few simple changes to regular routines. The City of Santee will continue to provide educational information and training to residents through the following media, where appropriate:

- Distribution of educational brochures that address a variety of residential activities (in person, by mail, and at the Department of Development Services lobby)
- Social media
- Distribution of door hangers (during City drive by inspections of residential areas)
- Articles in various publications
- Bill inserts (advertisements of Electronic Waste Recycling Event, Pollution Prevention Days Events, and other events)
- Mailers
- Radio and TV advertisements
- Movie slides

- Booths at public events
- Cleanups and trash collection walks

The City will continue to educate local residents and the general public so that they have an understanding of the following topics, where appropriate:

- Laws, regulations, permits, & requirements
- General urban runoff concepts
- Best management practices
    - Pollution prevention
    - Methods to minimize the impact of residential and charity car-washing
    - Methods to reduce over watering of lawns (misdirection of sprinklers onto sidewalks, over use of water)
    - Landscape and yard maintenance
    - Home improvement and maintenance
    - Pool and fountain maintenance
    - Waste management
- Other Topics

Community Outreach and Activities

The City has conducted public education to residents participating in local organizations such as the YMCA, charity groups, the San Diego River Park Foundation, and the school district. Activities include planning, participation, and information sharing at family events, San Diego River Days, fairs, community/river clean ups, and community service days.

The Santee Chamber of Commerce prints and circulates a newsletter to the residents and businesses of Santee on a quarterly basis which provides an ongoing opportunity to include information regarding water quality and storm water.

School Outreach and Education

Educating the City's youngest residents is important in two ways: ideally, the good habits/behaviors learned will be carried into adulthood, and secondly, children may educate their families and friends around them with the information they have learned. Children are impressionable at a young age, and are therefore more likely to act upon the knowledge given to them.

The City will continue to educate schoolchildren, teachers, and administrators through the following activities:

- Classroom presentations and assemblies
- Providing print and digital media
- Participating in school events and fairs
- Maintaining a relationship with Santee School District staff
- Engaging science teachers

Potential stormwater related topics may include the following, where appropriate:

- Water cycle
- Difference between sewers and storm drain systems
- Water conservation
- Importance of clean water for all life
- Common pollutants entering receiving waters
- Behavior change – ripple effect
- Waste management
- Proper use of fertilizers and pesticides, and other chemicals
- Car washing impacts
- General pollution prevention techniques
- Local wetlands, creeks, lakes, and rivers – plants and wildlife

10.3.5 Targeted Education

Targeted communities include communities or activities the City has determined may require increased educational efforts. The following factors contribute to the determination and evaluation of Santee's targeted communities:

1. Gaps in outreach efforts: The City implements a variety of educational efforts through various media. However, there may be certain communities or activities requiring additional educational outreach. The City will evaluate any gaps in education and outreach efforts in order to provide a comprehensive stormwater education program.
2. Activities generating pollutants of concern: Some water bodies within the City of Santee are on the current 303(d) list of impaired water segments for a variety of pollutants. Specifically, bacteria and nutrients are high priority pollutants within the City's watershed; these pollutants can be transported through both non-stormwater and stormwater runoff. Activities commonly associated with these pollutants, such as landscaping activities, will be targeted by the City educational outreach.

3. Non-storm water flows: As consistent with the goals of the new Municipal Permit and the San Diego River Water Quality Improvement Plan, the City will focus on communities and activities that may, or are known to, contribute non-stormwater flows to the City's MS4 in order to prevent pollutants from being transported downstream. Some categories of non-stormwater discharges were previously allowed under the 2007 Municipal Permit. The City will focus on providing education regarding newly prohibited non-storm water discharges, such as irrigation runoff, to audiences affected by the Permit changes.

Based on the criteria described above, the City will prioritize outreach efforts on the following communities and high-risk activities.

Apartment Complexes

The City has observed that many apartment complexes within the City have difficulty controlling trash and maintaining private sewer laterals. The City may provide apartment complexes with educational material regarding trash control and maintaining private sewer laterals.

New Residents

Because many new residents of the City may not know about the Storm Water Program, the City may meet with new development Homeowner Associations and Property Management firms to distribute storm water information. The City also encourages the Homeowner Association to distribute information to residents within the community.

Irrigation Runoff

When City personnel observe over-irrigation, over spray, or broken irrigation lines, an attempt is made to contact the responsible party on-the-spot. Door hangers are left with instructions when homeowners are not home. City personnel may request a corrective action response from the property owner/tenant, or otherwise follow-up to see if the problem has been addressed.

Individual Residential Car Washing

As discussed in the IDDE section of the JRMP, residents are required to implement BMPs to prevent the discharge of wash water and pollutants from entering the City's storm water conveyance system. Residents are encouraged to use professional car washes or implement BMPs at their homes to capture and contain all wash water produced by residential car washing. The City will follow up and focus efforts on those residential areas that continue to be a problem with additional educational materials and any necessary enforcement measures.

Carwash Fundraising Activities

The City encourages fundraising organizations to contact local car wash facilities to request use of their facility. Similar to residential and business related activity, charity/fundraising activities,

including carwashes, are not permitted to discharge wash water and pollutants to the storm water conveyance system. Charities and fundraising groups are encouraged to contact the City for guidance prior to holding a carwash event.

10.4 Public Participation Programs

Community involvement plays an important role in achieving the goals of the JRMP. The participation of the general public and school children in implementing Storm Water Programs helps improve awareness among individuals and may lead to improved water quality. Collaboration between the City and the community helps foster a sense of shared responsibility in protecting water quality both locally and regionally. Some programs, such as cleanup events, have direct water quality benefits. When the public has the opportunity to become more involved, there are several positive outcomes. First, those involved become more knowledgeable about storm water issues. Second, they become educators and stewards for the Storm Water Program and the watershed. Finally, they provide important feedback to the Storm Water Program regarding the concerns of the public and issues that may be overlooked. Ultimately, public participation helps make the education process more effective. The City encourages public participation though the programs discussed in this section.

Storm Drain Stenciling

High school, middle school, elementary school students, and any interested volunteers are encouraged to participate in a storm drain stenciling program that improves public awareness about the storm drain system. The program focuses on stenciling all major storm drains within public view and refreshing paint on previously stenciled drains.

Park and Residential Cleanups

Organizations such as the Girl or Boy Scouts, community groups, and corporations, are encouraged to organize cleanups of local parks, residential areas, trails, and river. The programs may include residential cleanup hikes through high priority residential areas and trash or recycling collection events in parks. The cleanups help remove trash and debris that may otherwise mobilize through the storm water conveyance system and receiving waters. Other cleanup events include events to clean out channels and invasive species within the City.

Public Reporting

The City encourages citizens to report any discharges, or other activity that may contribute pollutants to the City's storm water conveyance system by submitting a report through the regional hotline 1-888-846-0800, or via the City's website www.santeeh2o.org, or via email santee@cityofsanteeca.gov. The City advertises one or all of these reporting methods on all printed educational materials and inspection forms or notices. The regional hotline is available

24 hours a day in both English and Spanish, with a live person available Monday through Friday, 8:00 a.m. - 5:00 p.m.

Trash Collection Activities

Residents are encouraged to partake in evening neighborhood walks to pick up trash and debris encountered during the walk. Individuals may choose to use a bag to collect the trash or may choose to collect trash the night prior to trash collection day so that litter and debris can be directed deposited any to any available trash can along the street.

Hazardous Waste Collection and Used Oil Recycling

Santee contracts with one permanent household hazardous waste collection facility to accept residents' hazardous waste for free. Proof of residency (current driver's license or utility bill) is required. The facility is: Waste Management in El Cajon (avg. 10 min. drive from Santee). Open second and fourth Saturdays by appointment only. Residents must call Waste Management at 619-596-5100 for an appointment and directions. Residents may also contact Waste Management to arrange for curbside pickup of used oil and filters on regularly scheduled collection days. In addition to the used oil recycling services offered by Waste Management, used oil may also be disposed of at certified collection centers within the City and across the County. The City provides educational material focused on informing the public of waste collection facilities and used oil recycling centers. HHW events may be advertised on the City's website and social media sites.

Encourage Responsible Cleanup

Residents are encouraged to properly clean up after themselves and take responsibility for waste they produce. The City made the following efforts to encourage responsible cleanup, and plans to continue similar efforts in subsequent years:

- Pet waste bags are supplied at most parks and along trails to encourage responsible cleanup
- Work with Waste Management to cover dumpsters, keep trash areas clean, and replace or repair dumpsters that have a leak.

Public participation in the updating, development, and implementation of the JRMP

The City of Santee makes all JRMP documents available to residents or other interested parties in the City. Any comments received regarding JRMP components and implementation strategies will be reviewed and considered by the City.

11 Fiscal Analysis

11.1 Introduction

San Diego Regional Water Quality Control Board (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001, (Municipal Permit) requires the City of Santee (City) to secure the resources necessary to implement its Jurisdictional Runoff Management Program (JRMP). This includes the actions the City has committed to in the Water Quality Improvement Plan (WQIP) for the San Diego River Watershed Management Area (WMA).

The City is also responsible for reporting a storm water program fiscal analysis, including information about expenditures and funding sources, to the RWQCB each year. To satisfy this requirement, each department or division involved in the storm water program compiles financial information and provides it to the Department of Development Services, which compiles the information and reports the findings to the RWQCB.

11.2 Municipal Permit Compliance Funding Needs and Sources

Each two-year budget cycle, estimated costs for implementing the storm water program are prepared as part of the budget process. The specific amounts allocated and their corresponding funding sources are set in each year's final adopted budget.

11.2.1 Funding Needs

The storm water program funding needs are primarily driven by the following:

- The Municipal Permit, including the JRMP requirements of Section E and the WQIP requirements of Section B.
- Revised Total Maximum Daily Loads (TMDL) for Indicator Bacteria, Project I, which is incorporated into the Municipal Permit and which is also addressed by the San Diego River WQIP.

The activities necessary to comply with these regulations are described in the JRMP. Examples of these activities include street sweeping, cleaning of storm water hardened conveyance and underground systems, maintaining structural treatment devices, water quality monitoring, and inspecting construction sites and businesses to verify they are implementing appropriate measures to protect water quality.

11.2.2 Funding Sources

Through the budgeting process, the City identifies sources of funding to comply with storm water requirements. Specific funding sources are set during each budget process and are subject

to change over time. The main sources of funding in the past, which are also anticipated to be the main funding sources in future years, are discussed below.

The City's Zone 2 Flood Control has been and is expected to continue to be the main source of funding for the City's Storm Water Program. Additional funding sources result from fees that are collected through the developmental review and permitting process, business license fees, and Administrative Citations. One-time funding has also come from grants, including Prop 84.

11.3 Fiscal Analysis Reporting

As part of the required annual reporting process each year, the City will prepare a summary of expenditures from the reporting period and a list of funding sources for both the current and upcoming fiscal years. The list of funding sources will identify legal restrictions that apply to proposed funding sources where applicable.

Information necessary to complete the fiscal analysis each year will be collected from each responsible department or division. In accordance with Municipal Permit Provision E.8 (Fiscal Analysis), the City will report storm water expenditures for capital projects, operation and maintenance, and staffing. Staffing and operation and maintenance costs mainly relate to day to day program activities, such as storm drain cleaning, reviewing plan submittals for development projects, and enforcing compliance with the storm water requirements in the Municipal Code. Capital project expenditures commonly include the cost of installing LID features or other structural water treatment devices.

To allow sufficient time to complete the annual report, each department or division will summarize its storm water program activities and expenses and submit it to the Department of Development Services by the City's established internal data collection deadline. This internal deadline will be determined by the Development Services staff each year upon commencement of JRMP annual reporting coordination.

The City will continue to report its fiscal analysis information along with the JRMP annual reports until the RWQCB approves the WQIP. The due date for JRMP annual report submittal during the transitional period is October 31 following the end of the fiscal year. For example, FY 2015 ends on July 1, 2015, and the FY 2015 JRMP annual report is due to the RWQCB on October 31, 2015. After the WQIP is approved, the JRMP annual report forms and fiscal analysis data will not be provided directly to the RWQCB on their own. Instead, they will be included as part of the WQIP annual report. The City's fiscal analysis data will be included in the WQIP annual report for the San Diego River WQIP to which the City is a party. The WQIP annual report for each reporting period is due January 31 of the following year. For example, the FY 2018 WQIP annual report will be due on January 31, 2019. It is anticipated that the WQIP will be approved during FY 2016 and that the first WQIP annual report will be due in January 2017.

12 Reporting

12.1 JRMP Annual Reports

Section F.3.b.(1) of the Municipal Permit[1] requires the City of Santee (City) to document and demonstrate compliance with the Permit by completing an annual report. The report provides an opportunity to communicate the status of the Jurisdictional Runoff Management Program (JRMP) activities to the San Diego Regional Water Quality Control Board (RWQCB). Annual reports completed by the City will utilize the JRMP Annual Report Form as specified in the Municipal Permit. Annual reports will be completed prior to October 31 each year and will cover the previous reporting period (July 1 – June 30).

During the period before the Water Quality Improvement Plan (WQIP) for the San Diego River is approved, referred to as the "transitional period" in the Municipal Permit, the City will submit its JRMP annual reports directly to the RWQCB. Once the WQIPs are approved, JRMP annual reports will be submitted to the RWQCB through the WQIP annual reporting process. It is anticipated that the WQIPs will be approved during the 2015-2016 fiscal year and that the first WQIP annual reports will be due in January 2017.

The JRMP and annual reporting process involves a range of staff from different departments, such as the Department of Development Services, who are responsible for implementing and collecting data for their storm water program component. Although Development Services staff facilitate and monitor the overall program throughout the year, they rely on several key departments and divisions to achieve compliance and accurately document it for the annual report. Discussion for each of the subsections that follow is in order of sections on the Jurisdictional Runoff Management Program Annual Report Form.

12.1.1 Legal Authority

In each annual report, the City must confirm that adequate legal authority has been established and will be maintained within its jurisdiction to control pollutant discharges into and from its storm water conveyance system. As part of the first WQIP annual report, the City will submit a formal certification of legal authority, as required by Municipal Permit Section E.1.b. That certification statement will be signed by a Principal Executive Officer, Ranking Elected Official, or Duly Authorized Representative.

[1] San Diego Regional Water Quality Control Board Order No. R9-2013-0001, as amended by Order No. R9-2015-0001

12.1.2 JRMP Document Update

It will be reported in the JRMP annual report if any updates to the JRMP document were required or recommended by the RWQCB during the reporting period. The City must confirm that the JRMP document was in fact updated accordingly and made available, within the reporting period, on the Regional Clearinghouse, a website used for the collection and distribution of information developed and maintained by the Copermittees. If an update was required or recommended, and was not made available on the Regional Clearinghouse within the reporting period, the City will attach a schedule for the completion of the update and/or posting of the updated document on the Regional Clearinghouse with the JRMP Annual Report.

12.1.3 IDDE Program

The total number of non-storm water discharges that were reported by the public, detected by the City or contract staff, investigated, and/or eliminated within the reporting period will be documented on the Annual Report Form. The City will list sources of discharges to the City's storm water conveyance system, including sources outside the City's jurisdiction, that were identified during the reporting year and recorded in the City's records. Additionally, the total number of identified sources of non-storm water discharges and illegal discharges, the number of illegal connections and illegal discharges identified and/or eliminated, and the number of associated enforcement and escalated enforcement actions taken will be reported.

All non-storm water discharges are considered illegal discharges unless the source is identified as one of the categories of non-storm water discharges discussed in Section 3 of this report. If a non-storm water discharge is identified but not included in one of the categories of non-storm water discharges listed in Section 3, then the discharge is both a non-storm water discharge and an illegal discharge.

12.1.4 Development Planning Program

The City will report whether an update to its BMP Design Manual was required or recommended by the RWQCB during the reporting period. When an update has been required or recommended, the City's annual report will state whether the update was completed and posted on the Regional Clearinghouse. If the required or recommended update was not completed and made available on the Regional Clearinghouse, the City will attach a schedule for completing the update and posting the updated document on the Regional Clearinghouse and a rationale for why the update and posting were not completed during the reporting period.

Program implementation numbers will also be reported, including the total number of development projects submitted for review during the reporting period. Of these projects, the number that are Priority Development Projects (PDPs), and the number of PDPs that were

approved and/or granted occupancy during the reporting year will be reported. Any projects approved during the fiscal year that were granted any exemptions from the BMP Design Manual requirements and/or allowed to implement alternative compliance options in accordance with Permit Section E.3.c.(3) will be reported.

The numbers of completed PDPs in the City's inventory, high priority PDP structural BMP inspections, PDP structural BMP violations, and associated enforcement and escalated enforcement actions taken will also be included in the annual report form.

12.1.5 Construction Management Program

In accordance with the Municipal Permit annual report form, the numbers of active and inactive construction sites, construction sites closed/completed, construction site inspections and violations, and the number of enforcement and escalated enforcement actions will be reported.

12.1.6 Existing Development Management Program

The City must also report on its Existing Development Program, which includes the following components: municipal, commercial, industrial, and residential. The numbers of inventoried facilities or areas in the inventory, routine and follow-up inspections, violations, and enforcement and escalated enforcement actions taken will be reported for each of these four components.

12.1.7 Fiscal Analysis and Supplemental Data

Each year the City prepares a fiscal analysis summary, as described in JRMP Section 11 (Fiscal Analysis), and submits it along with the JRMP Annual Report Form. In addition to the JRMP Annual Report Form and fiscal analysis data, where applicable, the City may include supplemental tables, data, and narrative as part of its annual report submittals to provide further insight to JRMP activities. The reporting form provides an overview of JRMP activities; however, additional information may be provided to further document program successes and challenges during the reporting period. Once the WQIP annual reporting process begins, descriptions of the City's progress in implementing WQIP strategies will also likely need to be prepared and submitted.

CHAPTER 13.42 STORM WATER MANAGEMENT AND DISCHARGE CONTROL

13.42.010 Title.

This chapter shall be known as the Storm Water Management Ordinance.

13.42.020 Purpose and Intent.

A. The purpose of this chapter is to ensure the health, safety, and general welfare of the citizens of the City by:

1. Effectively prohibiting non-storm water discharges to the storm water conveyance system.

2. Eliminating illicit discharges and illicit connections to the storm water conveyance system.

3. Reducing the discharge of pollutants from the storm water conveyance system, to the maximum extent practicable in order to achieve applicable water quality objectives for surface waters in San Diego County.

4. Achieving compliance with total maximum daily load (TMDL) regulations.

B. The intent of this chapter is to protect and enhance the water quality of our watercourses, water bodies, and wetlands in a manner pursuant to and consistent with the Clean Water Act, the California Porter-Cologne Water Quality Control Act, and San Diego Regional municipal storm water permit.

13.42.030 Definitions.

The following words or phrases, whenever used in this chapter, shall be construed as defined in this section unless from the context a different meaning is intended or unless a different meaning is specifically defined and more particularly directed to the use of such words or phases:

“Basin Plan” means Water Quality Control Plan, San Diego Basin, Region 9, and duly adopted amendments thereto.

“Best Management Practices (BMPs)” means schedules of activities, prohibitions of practices, training and education, maintenance procedures, and other management practices to prevent or reduce the discharge of pollution to surface and groundwater to the maximum extent practicable. BMPs include, without limitation, structural and nonstructural treatment requirements, operating procedures, and practices to control urban runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs also include standard industry practices for controlling storm water and non-storm water runoff established by the California Stormwater Quality Association.

“BMP Design Manual” means the plan developed by the City in accordance with the City’s NPDES permit to eliminate, reduce, or mitigate the impacts of runoff from

development projects and existing development. On acceptance by the Regional Water Board, the BMP Design Manual will supersede the Standard Urban Stormwater Mitigation Plan (SUSMP) developed pursuant to Regional Water Board Order No. R9-2007-0001. Until superseded, the SUSMP shall be the BMP Design Manual. When adopted, the BMP Design Manual may be located online at: www.santeeh2o.org.

"BMP Standards Manual" means the guidance document prepared by the City which outlines the minimum required BMPs for the control of storm water in accordance with the municipal permit to eliminate, reduce or mitigate the impacts of pollutants and runoff. The BMP Standards Manual may be accessed online at: www.santeeh2o.org.

"California Ocean Plan" means the "California Ocean Plan: Water Quality Control Plan for Ocean Waters of California" adopted by the State Water Resources Control Board September 1991 and any duly adopted amendments thereto.

"CASQA Standards" means the BMPs included in the most recent iteration of the California Storm Water Quality Association ("CASQA") Construction BMP Handbook.

"City" means the City of Santee, California.

"Construction General Permit" or "CGP" means the General Permit for Storm Water Discharges associated with Construction and Land Disturbance Activities issued by the State Board, NPDES No. CAS000002, as it currently exists or may be amended and reissued from time to time. The Construction General Permit covers, in part, construction or demolition activity that results in a land disturbance of equal to or greater than one acre. The Construction General Permit is available from the State Board and may be accessed via www.santeeh2o.org.

"Copermittees" means each of the jurisdictions listed in the municipal permit.

"Development" or "development project" means construction, rehabilitation, redevelopment, reconstruction or land disturbance activity.

"Director" means the director of the Department of Development Services for the City or the Director's designee.

"Discharge" when used as a verb, means to allow pollutants to directly or indirectly enter storm water, or to allow storm water or non-storm water to directly or indirectly enter the storm water conveyance system or receiving waters, from an activity or operations which one owns or operates. When used as a noun, "discharge" means the pollutants, storm water or non-storm water that are discharged.

"Discharger" means any person or entity engaged in activities or operations owning facilities, from which an allowed non-storm water discharge to the storm water conveyance system may or does originate or which will or may result in pollutants entering storm water, the storm water conveyance system, or receiving waters or the owners of property on which such activities, operations or facilities are located, except that a local government or public authority is not a discharger as to activities conducted by others in public rights-of-way.

"Enclosed Bays and Estuaries Plan" means the "California Enclosed Bays and Estuaries Plan: Water Quality Control Plan for Enclosed Bays and Estuaries of California" adopted by the State Water Resources Control Board April 11, 1991, and any duly adopted amendments thereto.

"Enforcement Official" means any employee of the City who is responsible for enforcing the provisions of this chapter.

"Enforcement Response Plan" means the plan for enforcement of violations of this chapter developed in accordance with the municipal permit and included in the JRMP.

"Environmentally Sensitive Areas (ESAs)" means areas that include but are not limited to all Clean Water Act Section 303(d) impaired water bodies; areas designated in the Basin Plan as areas of special biological significance; water bodies designated in the Basin Plan with the RARE beneficial use; areas designated as preserves or their equivalent under the Multi Species Conservation Program within the City and County of San Diego; and any other equivalent environmentally sensitive areas which have been identified by the copermittees.

"Grading" means the cutting and/or filling of the land surface to a desired slope or elevation.

"Hydromodification" means a change in the natural watershed hydrologic processes and runoff characteristics (i.e. interception, infiltration, overland flow, and groundwater flow) caused by urbanization or other land use changes that result in increased stream flows and sediment transport. In addition, alteration of stream and river channels, such as stream channelization, concrete lining, installation of dams and water impoundments, and excessive streambank and shoreline erosion are also considered hydromodification due to their disruption of natural watershed hydrologic processes.

"Illicit Connection" means any conveyance or drainage system through which a non-storm water discharge to the storm water conveyance system occurs or may occur and any connection to the storm water conveyance system that conveys an illicit discharge.

"Illicit Discharge" means any discharge to the storm water conveyance system that is not composed entirely of storm water except discharges pursuant to a NPDES permit as specified in Section 13.42.060(C) of this chapter.

"Impervious Surface Area" means the ground area covered or sheltered by an impervious surface, measured in plain view. For example, the impervious surface area for a pitched roof is equal to the ground area it shelters, rather than the surface area of the roof itself.

"Industrial General Permit" means the General Permit for Storm Water Discharges Associated with Industrial Activities issued by the State Water Resources Control Board, NPDES No. CAS000001, as it currently exists or may be amended and reissued from time to time. The Industrial General Permit is available from the State Board and may be accessed via www.santeeh2o.org.

“Infiltration” in the context of low impact development means the percolation of water into the ground. Infiltration is often expressed as a rate (inches per hour), which is determined through an infiltration test. In the context of non-storm water, infiltration is water other than wastewater that enters a sewer system (including sewer service connections and foundation drains) from the ground through such means as defective pipes, pipe joints, connections, or manholes. Infiltration does not include, and is distinguished from, inflow.

“Jurisdictional Runoff Management Plan (JRMP)” means a plan adopted by the Santee City Council that outlines activities and requirements for compliance with the San Diego County municipal permit.

“Land Disturbance Activity” means any activity, whether or not a storm water quality management plan or County permit or approval is required, that moves soils or substantially alters the land such as a grading, digging, cutting, scraping, stockpiling, or excavating of soil; placement of fill materials; paving, pavement removal, exterior construction; substantial removal of vegetation where soils are disturbed including but not limited to removal by clearing or grubbing; clearing or road-cutting associated with geotechnical exploration and assessment, percolation testing, or any other activity that is a condition of a permit application; or any activity which bares soil or rock or involves streambed alterations or the diversion or piping of any watercourse.

“Low Impact Development (LID)” means a storm water management and land development strategy that emphasizes conservation and the use of on-site natural features integrated with engineered, small-scale hydrologic controls to more closely reflect pre-development hydrologic functions.

“Maximum Extent Practicable (MEP)” means implementation of all best management practices (BMPs) that are technically feasible (i.e. are likely to be effective), are not cost prohibitive, and adequately reduce or eliminate pollutant discharges from the storm water conveyance system. MEP will generally require a combination of site design, source control and treatment control BMPs that emphasize pollution prevention and source control BMPs as the first line of defense, and uses treatment control BMPs as a second line of defense. MEP also includes those practices considered or generally accepted as industry standards for the control of storm water and non-storm water runoff.

“National Pollution Discharge Elimination System (NPDES) permit” means a permit issued by the San Diego Regional Water Quality Control Board or the State Water Resources Control Board pursuant to Chapter 5.5, Division 7 of the California Water Code, or the Environmental Protection Agency (EPA) to control discharges from point sources to waters of the United States.

“New Development” means land disturbing activities, structural development, including construction or installation of a building or structure, the creation of impervious surfaces and land subdivision.

“Non-Storm Water Discharge” means any discharge to the storm water conveyance system that is not entirely composed of storm water.

"Pollutant" means, but is not limited to, any agent that may cause, potentially cause or contribute to the degradation of water quality such that a condition of pollution or contamination is created or aggravated, as defined by applicable laws and regulations.

"Pre-Development Runoff Conditions" means the approximate flow rates and durations that exist or existed onsite before land development occurs. For new development projects, this equates to runoff conditions immediately before project construction. For redevelopment projects, this equates to runoff conditions from the project footprint assuming infiltration characteristics of the underlying soil and existing grade. Runoff coefficients of concrete or asphalt must not be used. A redevelopment Priority Development Project must use available information pertaining to existing underlying soil type and onsite existing grade to estimate pre-development runoff conditions.

"Premises" means any building, lot, parcel, real estate, land or portion of land, whether improved or unimproved.

"Priority Development Project (PDP)" means development projects that fall under the City's planning and building authority and which must incorporate general, source control site design, pollutant control, and hydromodification management BMPs and other requirements as identified in the adopted SUSMP or BMP Design Manual. Priority Development Projects must demonstrate compliance with the requirements of this chapter through the development and implementation of a storm water quality management plan approved by the City.

"Rainy season" means from October 1 through April 30.

"Receiving waters" means surface bodies of water which serve as discharge points for the storm water conveyance system, including, but not limited to:

1. San Diego River, Forester Creek and Sycamore Creek.

2. Any water body that qualifies as a "water of the United States" as that term is defined herein.

3. Any water body that qualifies as a "water of the state" as that term is defined herein.

"Redevelopment" means the creation and/or replacement of impervious surface on an already developed site.

"Regional Water Board" means the Regional Water Quality Control Board, San Diego Region.

"San Diego County Municipal Storm Water Permit (municipal permit)" means San Diego Regional Water Quality Control Board Order No. R9-2013-0001, NPDES Permit No. CAS0109266, issued by the San Diego Regional Water Quality Control Board on May 8, 2013, amended by Order No. R9-2015-0001 on February 11, 2015, and any amendment revision or renewal thereof.

"Significant Redevelopment" means that creation or addition of impervious surfaces on an already developed site and is further defined in the adopted SUSMP/BMP Design Manual.

"Standard Urban Storm Water Mitigation Plan (SUSMP)" means a program adopted by the Santee City Council to reduce pollutants and runoff flows from all new development and significant redevelopment projects that qualify as priority development projects. The BMP Design Manual will supersede the SUSMP when adopted and accepted by the Regional Water Board pursuant to the municipal permit.

"Storm Water" means surface runoff and drainage associated with storm events and snow melt.

"Storm Water Conveyance System" means the conveyance or system of conveyances, public or private, by which water may be collected and conveyed, including, but not limited to, roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains.

"Storm Water Facilities Maintenance Agreement" means an agreement prepared as to content to the satisfaction of the City Engineer, approved as to form by the City Attorney and executed on behalf of the City by the Director of Development Services, by and between the City and the owner of any priority development project and designed to identify, preserve, and ensure the property maintenance and operation of all storm water controls in perpetuity.

"Storm Water Quality Management Plan ("SWQMP)" means a plan identifying the measures that will be used for storm water and non-storm water management for a development project. There are two types of SWQMPs: a Standard SWQMP and a PDP SWQMP. A PDP SWQMP is required for all Priority Development Projects west of the Pacific/Salton Divide. A Standard SWQMP is required for all development projects east of the Pacific/Salton Divide and for all projects west of the Pacific/Salton Divide that are not Priority Development Projects.

"Storm Water Pollution Prevention Plan" means an approved site-specific document which describes the on-site program activities to effectively eliminate pollutant discharges to the storm water conveyance system. This plan shall include information as designated in the JRMP and CGP.

"Surface Waters Plan" means the "California Inland Surface Waters Plan: Water Quality Control Plan for Inland Surface Waters of California" adopted by the State Water Resources Control Board, April 11, 1991, including duly adopted amendments thereto.

"Trash Amendments" means the amendment to the Water Quality Control Plan for Ocean Waters of California to Control Trash and Part 1 Trash Provisions of the Water Quality Control Plan for Inland Surface Water, Enclosed Bays, and Estuaries of California adopted by the State Water Resources Control Board and any amendments thereto.

"Water Quality Improvement Plan "WQIP") means the plan(s) developed by the City in accordance with Section II.B of the municipal permit for watershed management areas.

"Water Quality Standards" means the beneficial uses (e.g. swimming, fishing, municipal drinking water supply, etc.) of a water body and criteria (referred to as water quality objectives in the California Water Code) necessary to protect those uses.

"Watercourse" means any natural or artificial stream, river, creek, ditch, channel, canal, conduit, culvert, drain, waterway, gully, ravine, arroyo or wash, in which waters flow in a definite direction or course, either continuously or intermittently, and which has a definite channel and a bed or banks. A channel is not limited to land covered by minimal or ordinary flow but also includes land covered during times of high water. Watercourse does not include any surface drainage prior to its collection in a stream, river, creek, ditch, channel, canal, conduit, culvert, drain, waterway, gully, ravine, arroyo or wash.

"Waters of the State" means any water, surface or underground, including saline waters within the boundaries of the State as defined by California Water Code Section 13050(e). The definition of the waters of the state is broader than that for waters of the United States in that all water in the State is considered to be waters of the State regardless of circumstances or condition.

"Waters of the United States" shall have the meaning set forth in 40 CFR 122.2, as limited by any applicable court decision.

"Wet Season" means October 1st through April 30th of each year or as otherwise specified in any applicable NPDES permit or the municipal permit.

13.42.040 Responsibility For Administration.

A. This chapter shall be administered for the City by the Department of Development Services.

B. The Director may modify any requirement imposed by this chapter to allow the on-site collection and use of storm water or the collection of storm water for delivery to and use at City-designated sites, provided the modified requirements are enforceable, consistent with the municipal permit, and provide equivalent environmental protection.

13.42.050 Construction and Application.

A. This chapter shall be interpreted to assure consistency with the requirements of the Federal Clean Water Act and the California Porter-Cologne Water Quality Control Act, as amended, applicable implementing regulations, and the municipal permit.

B. Except as otherwise provided in this chapter, this chapter shall apply to any development project in the City, whether or not a permit or other approval is required. The requirements of this chapter apply to any discharger and any discharger may be required by the enforcement official to install, implement and maintain source control, structural or other BMPs to prevent or reduce the discharge of pollutants, storm water or non-storm water to the extent necessary to bring a discharge into compliance with this chapter.

13.42.060 Discharge of Pollutants and Non-Storm Water Prohibited.

A. No person shall:

1. Construct, maintain, operate and/or utilize any illicit connection.

2. Cause, allow or facilitate any illicit discharge.

3. Act, cause, permit or suffer any agent, employee, or independent contractor, to construct, maintain, operate or utilize any illicit connection, or cause, allow or facilitate any illicit discharge.

4. Discharge any material into the storm water conveyance system, or any premises or water body within the City's jurisdiction that may cause or threaten to cause a condition of pollution, contamination, or nuisance within the meaning of California Water Code Section 13050.

5. Discharge non-storm water into the storm water conveyance system or the receiving waters.

B. Specific prohibitions. Without limiting the prohibitions set forth in this chapter, no person shall:

1. Cause or permit irrigation water to enter the storm water conveyance system;

2. Cause or permit wash water from car washing, pavement washing and similar activities to enter the storm water conveyance system

C. Watercourses.

1. Every person owning property through which a watercourse passes, or such person's lessee or tenant:

a. Shall keep and maintain the watercourse within the property reasonably free of trash, debris, excessive vegetation, and other obstacles which would pollute, contaminate, or significantly retard the flow of water through the watercourse;

b. Shall maintain existing privately owned structures within or adjacent to a watercourse so that such structures will not become a hazard to the use, function, or physical integrity of the watercourse; and

c. Shall not remove healthy bank vegetation beyond that actually necessary for said maintenance which shall be accomplished in a manner that minimizes the vulnerability of the watercourse to erosion.

2. No person shall commit or cause to be committed any of the following acts, unless a written permit has first been obtained from the Director of Development Services and the appropriate state or federal agencies, if applicable:

a. Discharge pollutants into or connect any pipe or channel to a watercourse;

b. Modify the natural flow of water in a watercourse;

c. Deposit in, plant in, or remove any material from a watercourse including its banks, except as required for necessary maintenance;

d. Construct, alter, enlarge, connect to, change, or remove any structure in a watercourse; or

e. Place any loose or unconsolidated material along the side of or within a watercourse or so close to the side as to cause a diversion of the flow, or to cause a probability of such material being carried away by storm waters passing through such a watercourse.

3. The above requirements are in addition to, but do not supersede any requirements of state or federal law, including, but not limited to, lawful requirements imposed on a project or property owner by the California Department of Fish and Game or the United States Army Corps of Engineers.

D. Exceptions to Discharge Prohibition.

1. The prohibition on discharges shall not apply to any discharge regulated under a valid NPDES permit, provided that the discharger is in compliance with all requirements of the NPDES permit and other applicable laws and regulations and provided that the discharger takes actions to effectively prohibit discharges of pollutants to the storm water conveyance system.

2. The prohibition on discharges shall not apply to the following discharges unless the Regional Water Board or the Director determines the discharge to be a source of pollutants to receiving waters:

a. Diverted stream flows;

b. Rising ground waters;

c. Uncontaminated ground water infiltration to MS4s;

d. Springs;

e. Flows from riparian habitats and wetlands; and

f. Discharges from foundation drains where the system is designed to be located above the groundwater table at all times of the year, and the system is only expected to discharge non-storm water under unusual circumstances.

13.42.070 Discharge in Violation of Permit.

Each discharger identified in an individual NPDES permit relating to storm water discharges shall comply with and undertake all activities required by such permit. Any discharge that could result in or contribute to a violation of the municipal permit, either separately considered or when combined with other discharges, is prohibited. Liability for any such discharge shall be the responsibility of the person(s) causing or responsible for the discharge.

13.42.080 Reduction of Pollutants.

A. Best Management Practice Requirements.

1. Any person engaged in activities which will or may result in pollutants entering the storm water conveyance system or owning or operating any property that may discharge any pollutants, directly or indirectly, to the storm water conveyance system, shall undertake all best management practices to effectively prohibit discharge of such pollutants. Such persons must implement the minimal requirements identified in the BMP Design Manual, BMP Standards Manual, SUSMP, JRMP and otherwise meet industry standards for the control of pollutants, including, but not limited to, installing trash capture devices in accordance with the trash capture requirements in the Trash Amendments and BMP Standards Manual.

2. The owner, operator and person in charge of day-to-day activities of any existing and new development shall maintain construction BMPs and post-construction structural BMPs relied on to achieve and maintain compliance with this chapter and municipal permit. The owner of the land on which the BMPs are located and the person responsible for completing BMPs as part of a construction project shall implement, maintain or retrofit BMPs as necessary to ensure pollutants are removed from storm water. BMPs shall remain effective and function in the manner intended and shall not create a nuisance or condition of pollution.

B. Waste Management.

1. Littering. No person shall throw, deposit, leave, maintain, keep, or permit to be thrown, deposited, placed, left or maintained, any refuse, rubbish, garbage, or other discarded or abandoned objects, articles, and accumulations, in or upon any storm water conveyance system, street, alley, sidewalk, storm drain, inlet catch basin, conduit or other drainage structures, business place, or upon any public or private lot of land in the City, except as allowed by chapter 13.36 of this code or any other applicable solid waste laws or ordinances.

a. The occupant or tenant, or in the absence of occupant or tenant, the owner, lessee, or proprietor of any property in the City in front of which there is a paved sidewalk shall maintain said sidewalk free of dirt or litter. Sweepings from said sidewalk shall not be swept or otherwise made or allowed to go into the gutter or roadway, but shall be disposed of in receptacles maintained on said property as required for the disposal of garbage or recyclables.

b. No person shall throw or deposit waste in any fountain, pond, lake, stream or any other body of water in a park or elsewhere in the City.

2. Upon receiving notice from the City, the owner or operator of any property that discharges to the storm water conveyance system must install and operate best management practices to control and eliminate the discharge of waste from the property.

3. Parking Lots and Equivalent Structures. Persons owning or operating a parking lot or impervious surfaces used for similar purposes shall clean those structures as thoroughly and as often as is necessary to effectively prohibit the discharge of pollutants to the storm water conveyance system, but not less than once prior to each wet season. Sweepings or cleaning residue from parking lots or said impervious surfaces shall not be swept or otherwise made or allowed to go into the gutter or roadway.

4. Compliance with Best Management Practices. Every person owning or operating any activity, operation, or facility must comply with storm water best management practices adopted by federal, state, regional, or local agencies, as applicable.

13.42.090 Best Management Practices For Construction Projects.

Construction activities are dynamic in nature and must adjust to seasonal changes, changed site conditions, and other changes throughout the life of a construction project. The following requirements apply to construction projects.

A. Construction and Grading Permits. Prior to issuance of any construction or grading permit, the owner or applicant of any development project that involves ground disturbance or soil disturbing activities that can potentially generate pollutants in storm water runoff must prepare a pollution control plan, erosion and sediment control plan, and/or implement BMPs to the satisfaction of the Director and in accordance with the requirements of the BMP Standards Manual. Plans must ensure that the discharge of pollutants from the site will be reduced to the maximum extent practicable and will not cause or contribute to an exceedance of water quality standards. Each construction site shall implement such pollution control plans, erosion and sediment control plans and/or BMPs to ensure that discharges of pollutants to the storm water conveyance system are effectively prohibited and will not cause or contribute to an exceedance of water quality standards. All construction and grading activities shall comply with applicable laws, including all applicable City ordinances and the City's NPDES permit regulating discharges into and from the storm water conveyance system.

B. BMP Implementation. Each owner, operator, or person in charge of day-to-day activities of each construction and/or grading site in the City shall implement those minimum BMPs required by the CGP, SWPPP, or as may be designated by the Director. For those construction sites that are tributary to impaired water bodies and/or that are within or directly adjacent to or discharging directly to receiving waters within environmentally sensitive areas, such BMPs shall include such additional controls as the Director may require.

C. Compliance with Construction General Permit. The owner, operator or person in charge of day-to-day activities of each construction project that disturbs one acre or more of soil or disturbs less than one acre but is part of a larger common plan of development or sale of one or more acres of disturbed surface land is subject to the Construction General Permit and shall comply with all provisions of such permit. Proof of compliance with the Construction General Permit satisfactory to the Director of Development Services must be submitted prior to obtaining a grading or building permit.

D. Storm Water Pollution Prevention Plan (SWPPP).

1. Each development project required to prepare a site-specific Storm Water Pollution Prevention Plan (SWPPP), either to comply with the CGP or to comply with City Ordinance or City Policy, shall have said plan prepared, at a minimum, in accordance with the construction requirements contained in the BMP Design Manual and JRMP.

2. Each SWPPP shall be revised as necessary to meet the storm water requirements of each project site as it changes through different phases of construction and different seasons of the year. Where, during implementation of the SWPPP, the requirements and/or conditions included in the SWPPP result in a level of protection that is less than that set forth in the CGP, the City's JRMP, the SWPPP shall be amended to include the higher level of protection required. BMPs shall be improved, adjusted and maintained as needed to ensure that any discharge of pollutants is prevented.

13.42.093 Best Management Practices For New Development and Significant Redevelopment

A. All New Development and Redevelopment.

1. Any person performing construction work in the City, regardless of whether a permit is required for such work, shall effectively prohibit pollutants from entering the storm water conveyance system by complying with all applicable local ordinances, the California Storm Water Quality Association (CASQA) standards, applicable provisions of the CGP, and the City's BMP Design Manual, BMP Standards Manual, and JRMP as presently adopted by the City or as may in the future be amended by resolution. To the extent any requirements in an applicable NPDES permit, SUSMP/BMP Design Manual, BMP Standards Manual, or JRMP conflict with any other provision of this Ordinance, the requirement that is most protective of the environment shall prevail.

a. Onsite BMPs must be located so as to remove pollutants from runoff prior to discharging to any receiving waters or to the storm water conveyance system, and be located as close to the source as possible and must be designed and implemented to avoid creating nuisance or additional pollutant sources, including those associated with vectors; and

b. Structural BMPs must not be constructed within waters of the United States; and

2. Prior to the issuance by the City of a grading permit or building permit for any new development or significant redevelopment, the project applicant shall submit project plans to the Director of Development Services who may impose terms, conditions and requirements on the project in accordance with all applicable local ordinances, the CASQA standards, and the City's SUSMP/BMP Design Manual, BMP Standards Manual, and JRMP.

a. Prior to the effective date of the BMP Design Manual, the following requirements apply to all new development and significant redevelopment:

(i) The owner or applicant of a new development or significant redevelopment project must submit a storm water management plan in

accordance with the SUSMP. The plan must describe the manner in which BMPs required by this chapter will be implemented and maintained.

(ii) All new development and significant redevelopment projects must be designed to employ post-construction BMPs, where feasible, including, but not limited to, the following:

A. Source control BMPs.

B. Hydromodification management.

b. After the effective date of the BMP Design Manual, the following requirements apply to all new development and significant redevelopment:

(i) The owner or applicant of a new development or significant redevelopment project must submit a storm water quality management plan in accordance with the BMP Design Manual. The plan must describe the manner in which BMPs required by this chapter will be implemented and maintained.

(ii) All new development and significant redevelopment projects must be designed, constructed, and maintained to employ post-construction BMPs, consistent with the BMP Design Manual, including, but not limited to, the following:

A. Source control BMPs shall prevent illicit discharges and protect outdoor trash and material storage areas from rainfall, run-on, runoff, and wind dispersal.

B. Site designs, where feasible, shall maintain or restore natural storage reservoirs and drainage corridors; provide buffer zones for natural water bodies; conserve natural areas within the project footprint; minimize the size of streets, sidewalks, parking areas, impervious areas, and soil compaction to landscaped areas; disconnect impervious surfaces; infiltrate, retain and/or treat runoff from impervious areas prior to discharging to the storm water conveyance system; use permeable materials, native or drought tolerant landscaping; and harvest precipitation for landscaping or other permitted uses.

3. The owner of a new development or significant redevelopment project, or upon transfer of the property, its successors and assigns, shall implement and adhere to the terms, conditions and requirements imposed pursuant to this section. Failure by the owner of the property or its successors or assigns to implement and adhere to the terms, conditions and requirements imposed pursuant to this section shall constitute a violation of this chapter.

4. The Director may require that the terms, conditions and requirements imposed pursuant to this section be incorporated into a Storm Water Facilities Maintenance Agreement in accordance with Section 13.42.140 and be recorded with the County Recorder's Office by the property owner.

B. Priority Development Projects (PDP). In addition to the requirements in Section 13.42.093.A, PDPs are subject to the following requirements:

1. The owner or applicant of a PDP must install and implement BMPs in accordance with the requirements of this chapter prior to receiving final approval of the project or as otherwise specified in the conditions of approval.

a. Prior to the effective date of the BMP Design Manual, the following requirements apply to all PDPs:

(i) Low impact development BMPs must be selected and implemented to the maximum extent practicable. Low impact development BMPs must be installed, implemented, and maintained to maximize infiltration, provide retention, slow runoff, minimize impervious footprint and constructed widths, and direct runoff to impervious areas.

(ii) Structural BMPs must be installed, implemented and maintained to meet the design storm criteria required under Regional Water Board Order No. R9-2007-0001 and as described within the BMP Design Manual.

b. After the effective date of the BMP Design Manual, the following requirements apply to all PDPs:

(i) All PDPs must be designed, constructed, and maintained to employ post-construction BMPs consistent with the BMP Design Manual, including but not limited to the following:

A. Low impact development BMPs designed to retain (intercept, store, infiltrate, evaporate, and evapotranspire) onsite the pollutants contained in the volume of storm water runoff produced from a 24-hour 85th percentile storm event (design capture volume). If applicant demonstrates, to the Director's satisfaction, that onsite retention is not technically feasible, biofiltration or flow-thru BMPs may be used in accordance with the following:

I. Biofiltration BMPs must be designed to have an appropriate hydraulic loading rate to maximize storm water retention and pollutant removal; prevent erosion, scour, and channeling within the BMP; and be sized to treat 1.5 times the design capture volume not reliably retained onsite.

II. If biofiltration BMPs are not technically feasible, flow thru treatment control BMPs may be used; provided however, that such BMPs must treat the design capture volume not reliably retained onsite and must be sized and designed in accordance with the requirements of the municipal permit and BMP Design Manual.

B. Hydromodification management BMPs that are sized and designed such that post-project runoff conditions (flow rates and durations) will not exceed the pre-development runoff conditions by more than 10 percent (for the range of flows that result in increased potential for erosion or degraded instream habitat downstream of the Priority Development Project). A PDP may be exempt from the hydromodification management BMP requirements in this subsection, at the discretion of the Director, where the project discharges water to any of the following: existing underground storm drains that

discharge directly to water storage reservoirs, lakes, enclosed embayments, or the Pacific Ocean; conveyance channels whose bed and bank are concrete lined from the point of discharge to the water storage reservoir, lake, enclosed embayment, or the Pacific Ocean; or an area the City deems appropriate for an exemption pursuant to any Watershed Management Area Analysis incorporated into an applicable Water Quality Improvement Plan accepted by the Regional Water Board.

(ii) All PDPs must avoid critical course sediment yield areas identified by the City or in any Watershed Management Area Analysis accepted by the Regional Water Board unless measures are implemented that allow for no net impact from critical coarse sediment to the receiving water and comply with the BMP Standards Manual.

C. Improvements to Existing Development. Any applicant for a permit to construct improvements to existing property shall install, maintain, and operate trash enclosure and trash capture devices required by the Trash Amendments or by any plan or policy adopted by the City in accordance with the Trash Amendments.

13.42.095 Best Management Practices For Commercial and Industrial Activities.

A. Business-Related Activities. All owners or operators of premises where pollutants from business-related activities may enter the storm water conveyance system must prevent such a discharge and must implement industry standard pollution prevention methods to eliminate pollutants in runoff. Staff at these businesses must be trained in the procedures to prevent the discharge of pollutants to the storm water conveyance system. The enforcement official may require the business to develop and implement a Storm Water Pollution Prevention Plan (SWPPP). Examples of business-related activities include maintenance, storage, manufacturing, assembly, equipment operations, vehicle loading, and/or cleanup procedures which are carried out partially or wholly outside.

B. Coordination with Hazardous Materials Release Response Plans and Inventory. Any business subject to the Hazardous Materials Release Response and Inventory Plan, Chapter 6.95 of the California Health and Safety Code, shall include in that plan provision for compliance with this chapter, including the prohibitions on non-storm water discharges and illicit discharges.

C. Compliance with NPDES Storm Water Permits. Each industrial discharger, discharger associated with construction activity, or other discharger, subject to any NPDES storm water permit addressing such discharges, shall obtain and comply with, and undertake all other activities required by any storm water permit applicable to such discharges, including, but not limited to, the State Water Resources Control Board Statewide General Industrial and General Construction Permits, Hydrostatic Discharge Permit, and the San Diego Regional Water Quality Control Board General De-Watering Permits. Each discharger operating under the Industrial General Permit must maintain records in accordance with the requirements of the Industrial General Permit and make those records available for inspection by the City. Non-filers will be reported to the Regional Water Board.

13.42.100 Authority to Inspect.

A. The owner, occupant, or operator of any property or activity subject to the requirements of this chapter must allow the enforcement official of the City to make an inspection of any facility, activity, or residence during normal business hours to enforce the provisions of this chapter, and to ascertain whether the purposes of this chapter are being met.

B. An inspection may be made after the enforcement official has presented proper credentials and the owner and/or occupant authorizes entry. If the enforcement official is unable to locate the owner or other persons having charge or control of the premises, or the owner and/or occupant refuses the request for entry, the City is hereby empowered to seek assistance from any peace officer or court of competent jurisdiction in obtaining entry.

C. In the event of an emergency that presents a direct threat to the environment or public health, safety and welfare, the enforcement official may conduct an immediate inspection as necessary to remedy the direct threat to the public.

D. Any person who engages in any willful and unlawful use of force or violence upon the enforcement official may be subject to criminal prosecution pursuant to Penal Code section 243.

E. The City shall have the right to establish, or require the establishment of, such devices as are necessary to conduct sampling or metering operations on any property.

13.42.120 Notification of Spills.

As soon as any person who is responsible for emergency response for, or in charge of, a premises or facility that has knowledge of any confirmed or unconfirmed release of materials, pollutants or waste which may result in pollutants or non-storm water discharges entering the City's storm water conveyance system or the receiving waters, such person shall take all necessary steps to ensure the containment and minimize the damages of such release, provided that such steps do not violate applicable health and safety regulations and/or facility hazardous materials handling procedures and policies. Such person shall immediately notify the City of the occurrence and the County of San Diego Department of Health Services Hazardous Materials Management Division, and any other appropriate agency.

13.42.130 Requirement to Test, Monitor Or Mitigate.

A. The Director of Development Services may require that any person engaged in any activity and/or owning or operating any facility which may cause or contribute to storm water pollution or contamination, illicit discharges, and/or discharge of non-storm water to the storm water conveyance system, undertake such monitoring activities, including physical and chemical monitoring, and/or analyses and furnish reports as the City may specify. Specific monitoring requirements shall bear a reasonable relationship to the types of pollutants which may be generated by the person's activities or the facility's operations.

B. The City, in cooperation with local wastewater programs, may require a person, or facility owner or operator, to install or implement storm water pollution reduction

or control measures, including but not limited to, process modification to reduce the generation of pollutants or a pretreatment program approved by the Regional Water Board and/or the City. Specific monitoring requirements shall bear a reasonable relationship to the types of pollutants which may be generated by the person's activities or the facility's operations.

C. If testing, monitoring or mitigation required pursuant to this chapter are deemed no longer necessary by the Director of Development Services, then any or all of the above requirements will be discontinued.

13.42.140 Storm Water Facilities Maintenance Agreement.

As a condition of development, the owner of PDPs must, prior to occupancy of the development, enter into a Storm Water Facilities Maintenance Agreement with the City. The agreement shall be recorded to run with the land and shall be binding upon the owner, and their heirs, and successors in interest to the project and to any real property developed in conjunction with the project in perpetuity. The agreement shall include an annual requirement that verification of the effective operation and maintenance of each approved treatment control BMP be conducted by the owner. Maintenance shall be performed by the owner and certified to the City prior to each rainy season. The agreement shall also include a right of entry on the part of the City for the purpose of inspecting and confirming the condition of permanent storm water BMPs and to perform maintenance or repairs where operation and maintenance is not conducted in a proper or timely fashion.

13.42.145 Response Plans

Enforcement of this chapter shall be consistent with the provisions of the Enforcement Response Plan developed by the City which sets forth enforcement procedures and actions to address repeat and continuing violations of this chapter. The enforcement official may develop, amend, and implement the Enforcement Response Plan, a Spill Response Plan setting forth the procedures, roles and responsibilities for investigating, cleaning up and reporting spills, an Illicit Discharge Response Plan setting forth the procedures and responsibilities for investigating and abating illicit discharges, and other plans required by or convenient to comply with the municipal permit.

13.42.150 Violations Constituting Misdemeanors.

The violation of any provision of this chapter, failure to comply with any of the mandatory requirements of this chapter, and the provision of false testimony or falsification of any statement made in accordance with this chapter shall constitute a violation of this chapter and such violations are declared to be misdemeanors; except not withstanding any other provisions of this chapter, any such violation constituting a misdemeanor under this chapter may, in the discretion of the City Attorney, be charged and prosecuted as an infraction.

13.42.160 Penalties For Violation.

A. Civil Penalties. Any person who violates any of the provisions of this chapter shall be liable for a civil penalty not to exceed one thousand dollars per violation per day in which such a violation exists, and all pollution detection and mitigation costs, if applicable.

B. Criminal Penalties. Any person who knowingly or intentionally violates any provision of this chapter or falsifies any record or statement required by this chapter shall be guilty of a misdemeanor punishable by imprisonment in the County Jail for a period not to exceed one year, or a fine not to exceed ten thousand dollars for each day such a violation exists, or both.

C. Monetary Penalties. Any violation of any provision or failure to comply with any of the mandatory requirements of this chapter may also be subject to an Administrative Citation and/or fine issued under chapter 1.14 of this Code. Any monetary penalties collected by the City pursuant to violations of this chapter, shall be used for storm water pollution prevention and program management.

D. Cost Recovery. Any person who violates any provision of this chapter shall be liable for all costs incurred by the City to investigate, remedy, and prosecute such violation, including, but not limited, to attorneys' fees.

E. Permit Revocation and Denial. Any person who violates any provision of this chapter may be subject to denial or revocation of a City-issued permit or license in accordance with chapter 5.02 of this code.

F. Notice of Ineligibility for Land Development. Any person who fails to perform work on a priority development project, construction project, or land disturbing activity obtaining and complying with a Standard SWQMP, PDP SWQMP, SWPPP, or other plan as required by this chapter may be ineligible to continue development or construction activities. A notice of intent to file a notice of ineligibility for land development and an eligibility hearing shall be held as follows:

1. The notice of intent must:

a. Be served on the owner personally or mailed by certified mail and first class mail to the address shown on the most recent tax assessment roll and be posted on the property;

b. State the City's intent to fil a notice of ineligibility for land development.

c. Fix a location, time and date, which shall be not less than 15 days after delivery of the notice, at which a hearing will occur and at which the owner may submit written or oral comments or reasons why a notice of ineligibility should not be filed.

2. The eligibility hearing must:

a. Be held at the appointed time, or at a time agreed to by all parties,

b. Provide the owner an opportunity to present written or oral comments or reasons why a notice of ineligibility should not be filed; and

c. Result in a determination of whether a violation occurred, whether it has been remedied, and whether to file a notice of ineligibility for land development.

3. A notice of ineligibility filed in accordance with this section shall remain in effect until the enforcement official files a "Release of Notice of Ineligibility for Land Development." A Release of Notice of Ineligibility for Land Development may be filed when the owner implements all required plans and BMPs and remedies any noncompliant site conditions to the Director's satisfaction. During the effective dates of any notice of ineligibility filed in accordance with this section, no application for a building permit, administrative permit, site plan, use permit, variance, tentative parcel map, tentative map, parcel map, or final map or any other permit for the development of the property, on which the violation occurred and which resulted in the notice of ineligibility shall be approved.

13.42.170 Continuing Violation.

Unless otherwise provided, a person, a firm, corporation or organization shall be deemed guilty of a separate offense for each and every day during any portion of which a violation of this chapter is committed, continued or permitted by the person, firm, corporation or organization and shall be punishable accordingly as provided in Section 13.42.160 of this chapter.

13.42.180 Concealment.

Causing, permitting, aiding, abetting or concealing a violation of any provision of this chapter shall constitute a violation of such provision.

13.42.190 Violations Deemed a Public Nuisance.

A. In addition to any other penalties provided in this chapter, any condition caused or permitted to exist in violation of any of the provisions of this chapter that is a threat to the public health, safety and welfare or is declared and deemed a public nuisance and impacts storm water quality, may be summarily abated and/or restored by any authorized enforcement official, and/or civil action to abate, enjoin or otherwise compel the cessation of such nuisance may be taken by the City Attorney or a designated representative.

B. The cost of such abatement and restoration shall be borne by the owner of the property and the cost thereof shall be a lien upon and against the property and such lien shall continue in existence until the same shall be paid. If the lien is not satisfied by the owner of the property within three months after the completion by the authorized enforcement official of the removal of the nuisance and the restoration of the property to its original condition, the property may be sold in satisfaction thereof in a like manner as other real property is sold under execution.

13.42.200 Administrative Enforcement Powers.

In addition to the other enforcement powers and remedies established by this code, any authorized enforcement official has the authority to utilize the following administrative remedies:

A. Notice of Violation. When an authorized enforcement official finds that a discharge has taken place or is likely to take place in violation of this chapter, the official may issue a Notice of Violation and direct that those persons not complying shall:

1. Comply with the requirement to cease and desist such discharge, or practice, or operation likely to cause such discharge;

2. Comply with a time schedule for compliance; and/or

3. Take appropriate remedial or preventative action to prevent the violation from recurring.

B. Referral to the Regional Water Board. A violation of this chapter may be referred to the Regional Water Board for enforcement action in accordance with the requirements of the municipal permit or plans adopted pursuant to the municipal permit.

C. Whenever an authorized enforcement official finds any oil, earth, dirt, grass, weeds, dead trees, tin cans, rubbish, refuse, waste or any other material of any kind, in or upon the sidewalk abutting or adjoining any parcel of land, or upon any parcel of land or grounds, which may result in an increase in pollutants entering the City's storm water conveyance system or a non-storm water discharge to the City's storm water conveyance system, the enforcement official may issue orders and give written notice to remove such material without causing a discharge to the storm drain system. The recipient of such notice shall undertake the activities as described in the notice within the prescribed timeframe.

13.42.210 California Code of Civil Procedure Section 1094.6.

The provisions of Section 1094.6 of the California Code of Civil Procedure are applicable to judicial review of the City decisions pursuant to this chapter.

13.42.220 Civil Actions.

A. In addition to any other remedies provided in this chapter, any violation of this section may be enforced by civil action brought by the City. In any such action, the City may seek, without limitation, and the court shall grant, as appropriate, any or all of the following remedies:

1. Injunctive relief;

2. Assessment of the violator for the costs of any investigation, inspection, or monitoring survey which led to the establishment of the violation, and for the reasonable costs of preparing and bringing legal action under this subsection;

3. Costs incurred in removing, correcting, or terminating the adverse effects resulting from the violation;

4. Compensatory damages for loss or destruction to water quality, wildlife, fish and aquatic life. Assessments under this subsection shall be paid to the City to be used exclusively for costs associated with monitoring and establishing storm water discharge pollution control systems and/or implementing or enforcing the provisions of this chapter, or for implementing water quality improvement projects.

13.42.230 Remedies Not Exclusive.

Remedies under this chapter are in addition to and do not supersede or limit any and all other remedies, civil or criminal. The remedies provided for herein shall be cumulative and not exclusive.

13.42.240 Severability and Validity.

If any portion of this chapter is declared invalid, the remaining portions of this chapter shall be considered valid.

CITY OF SANTEE

STORM WATER
ENFORCEMENT RESPONSE PLAN

Prepared By:

City of Santee
Department of Development Services

TABLE OF CONTENTS

CITY OF SANTEE
STORM WATER
ENFORCEMENT RESPONSE PLAN

I. INTRODUCTION

A. Storm Water Management Program

The City of Santee (City) enforces compliance with the requirements of its Storm Water Management Ordinance (Santee Municipal Code Chapter 13.42)("Ordinance"), including the BMP requirements outlined in the City's Guidelines for Surface Water Pollution Prevention included as Appendix C of the City's Jurisdictional Runoff Management Program (JRMP) document. In accordance with Section E.6 of the Regional Water Quality Control Board, San Diego Region (Regional Water Board) Order No. R9-2013-0001, as amended by Order R9-2015-0001 (Municipal Permit or Permit), compliance with the City's ordinances will be assessed through a variety of means, including inspections, responses to hotline calls, and routine outfall monitoring. Where violations are observed, the enforcement actions and procedures described in this Enforcement Response Plan (ERP) will be employed to enforce the requirements.

The City typically employs a tiered, escalating enforcement system. However, the City reserves the right to use whatever tools the enforcement official deems most appropriate for a given situation, as dictated by the specifics of each case.

Enforcement actions, including escalated enforcement actions, are described in the following sections. It should be noted that experience and professional judgment of City staff are important in guiding the appropriate response to a violation. Escalated enforcement actions will continue to increase in severity, pursuant to City protocols, to compel compliance as soon as possible.

B. ERP Objectives

This ERP works in conjunction with the Ordinance to effectively administer the City's storm water quality control programs. The ERP establishes progressive enforcement measures in response to instances of noncompliance and is designed to meet the following objectives:

1. Identify and investigate instances of noncompliance;
2. Establish enforcement responses appropriate to the nature and severity of the violation and the overall degree of noncompliance;
3. Provide a guide to encourage uniform application of enforcement responses for comparable types of violations; and
4. Ensure adequate, consistent, and timely enforcement actions for the protection of the environment and public health, safety and welfare.

II. OVERVIEW OF THE ENFORCEMENT RESPONSE PLAN

This ERP describes how the City will investigate instances of noncompliance with the Ordinance and the types of enforcement responses available to address noncompliance. It establishes a guide for determining the appropriate enforcement response based on the nature, magnitude, effect, duration, and frequency of a violation and any efforts to maintain compliance or eliminate noncompliance. The goal of this ERP is to achieve compliance with the Ordinance for the protection of the environment and the public health, safety, and welfare.

A. Investigations

The City has adopted investigation and monitoring programs for Municipal, Industrial and Commercial, Residential, and Construction facilities, and for all development projects, as part of its Storm Water Management Program. The City also investigates and monitors illicit discharges. The City ensures that pollution prevention methods and BMPs are implemented by enforcing its Ordinance. City inspectors and staff members properly document each observed violation at facilities failing to comply with storm water requirements, and enforcement action is taken where necessary to bring about compliance. Inspectors seek to resolve non-compliance promptly and establish appropriate compliance time frames on a case-by-case basis.

As required by the Municipal Permit, City inspectors will seek to resolve incidents of observed non-compliance within 30 calendar days, or prior to the next rain event, whichever is sooner. In cases where the violation cannot be resolved within the appropriate timeframe, the reason additional time was needed for case resolution will be documented and kept on file.

Discharges related to non-compliance deemed to pose a threat to human or environmental health will be reported will be reported to the Regional Water Board verbally within 24 hours and in writing within five (5) days, as required by Attachment B of the Municipal Permit. Section 3.3.2.5 of the City's JRMP document provides more information on reporting requirements.

The City will notify the Regional Water Board in writing within five (5) calendar days of issuing escalated enforcement to a construction site that poses a significant threat to water quality as a result of violations or other non-compliance with its permits and applicable local ordinances, as required by the Municipal Permit.

1. Municipal Enforcement

During routine municipal facility inspections, City or contract staff will assess facility areas and activities to ensure all are maintained in accordance with City regulations, ordinances, and BMP requirements. If BMPs are found to be deficient or otherwise ineffective, the responsible party or

department will be provided with required corrective actions. If the inspector notes that specific areas of a leased facility require additional BMPs, the City can require the implementation of BMPs in addition to the required minimum for the specific area/activity. If a leased facility continues to be out of compliance, the City may choose to discontinue the lease, which would remove the tenant from that particular site.

If the responsible City staff member or department/division does not perform the necessary corrective actions in response to the direction of their immediate superior, escalated enforcement action will be taken by involving higher ranking representatives within the responsible department or division, who may enact internal disciplinary procedures, until the deficiencies are resolved.

2. Industrial and Commercial Enforcement

a. <u>Fixed Facility Enforcement</u>

The City conducts inspections in accordance with Permit requirements. If the City inspector observes a significant and/or immediate threat to water quality, action will be taken to require the facility owner and/or operator to immediately cease and correct the discharge or activity. Conditions that would warrant such action may include observations of runoff from the industrial site that are not reasonably controlled by the protective measures or observation of a failure in BMPs resulting in or potentially resulting in a release of pollutants to a degree that may substantially degrade water quality. Escalated enforcement measures are used as needed to ensure compliance. The City maintains the authority to require facilities to prepare Storm Water Pollution Prevention Plans or to conduct sampling and analysis where deemed necessary by the City.

b. <u>Mobile Business Enforcement</u>

Most violations associated with mobile businesses are anticipated to be related to illicit discharges. The City's enforcement approach to such discharges will require the discharge to be stopped and the area cleaned of discharged materials when applicable and feasible. Education may also be provided to operators who are not aware of the City's storm water requirements. Businesses that do not possess the materials necessary to implement the required BMPs will likely be required to demonstrate to the City that they have obtained such materials and can properly use them before the City allows such businesses to resume operations in the City. Mobile businesses that do not have City business licenses will be required to obtain them.

3. Residential Enforcement

There are two methods of discovering residential activities contributing to urban runoff. One is through complaint/referral process. Complaints may be received through direct contact with City, contract staff, or through calls to the City's Reporting Hotline. The other route is through observations made by City staff during residential area inspections, during scheduled dry weather outfall monitoring, and during routine City activities such as storm water conveyance system maintenance. Additional, focused investigations of areas upstream of outfalls with obvious pollutants present during the Dry Weather Outfall Monitoring Program and complaint response investigations provide further information about potential problem areas. The City believes that the combination of monitoring, public reporting, direct observations by City staff that are routinely in the field, and targeted additional investigations where necessary provide sufficient oversight of residential areas and activities.

During investigations of incidents reported to the hotline, or discovered during routine MS4 outfall monitoring, that are associated with a residential source, City staff will address issues of storm water concern where feasible, and provide education where appropriate. Violations to the City's Municipal Code will be investigated by authorized enforcement staff. Violations are documented and depending on the nature and severity of the violation, enforcement may consist of any of the enforcement measures described in this Enforcement Response Plan.

Follow-up inspections conducted as a result of residential BMP deficiencies will be performed. Violations will continue to be investigated by City personnel with enforcement authority within a reasonable timeframe.

4. Construction Management Enforcement

The City conducts inspections in accordance with Permit requirements and works closely with all development projects prior to the commencement of construction activities. All construction sites are expected to be aware of the City's BMP requirements. The City seeks to resolve violations as quickly as possible, including prior to rain events where feasible. In cases of significant or repeated non-compliance, the City may hire an outside contractor to implement required BMPs at a construction site when there is at least a 50% chance of rain within the next 72 hours.

When a site is subject to the Construction General Permit (CGP), City staff may also collaborate with Regional Water Board staff on enforcement actions. The City will notify the Regional Water Board in writing within five calendar days of issuing escalated enforcement to a construction site that poses a significant threat to water quality as a result of violations of other noncompliance. Written notification may be provided to the appropriate Regional Water Board staff member by email. The City will also notify the Regional Water Board of any construction sites required to obtain coverage under the CGP that, to the City's knowledge, have not filed NOIs, within five calendar days from the time the City became aware of the circumstances. At minimum, the construction project location and name of owner or operator will be provided to the Regional Water Board. Written notification may be provided electronically by email to Nonfilers_R9@waterboards.ca.gov.

5. Development Planning Enforcement

The City conducts inspection in accordance with Permit requirements. The City's current plan check process includes steps to enforce the implementation of development requirements during construction. Since all structural BMPs are required to be shown on the project's plans, inspectors check to make sure these BMPs have been correctly installed during their routine inspections. If any mistakes in BMP installation are noted during plan checks, the City requires the project to promptly correct these errors until BMP installation is consistent with the specification on the project's approved plans.

Once a project has been completed, ongoing operation and maintenance is verified through inspections or through review of submitted maintenance verification certifications. If an inspector finds maintenance deficiencies with any structural BMPs at a site, he or she first attempts to explain the deficiencies and necessary corrective actions to the responsible party, if the responsible party is present. If the responsible party performs all necessary corrective actions promptly in response to the verbal explanation from the inspector, the case is closed, and the resolution is documented. Otherwise, a written notice is issued to the responsible party. The notice indicates the type and location of each BMP and describes the deficiencies observed by the inspector as well as the required corrective actions. Responsible parties are required to perform the corrective actions and demonstrate that all necessary maintenance activities were completed through a re-inspection with the City inspector or through providing photographs of corrections. The inspector may also request additional documentation or perform a re-inspection at their discretion.

The maintenance condition of structural BMPs are determined through an annual self-certification program where the City requires reports from authorized parties demonstrating proper maintenance and operation of BMPs. If the responsible party fails to provide the annual report, the City will issue a written notice requiring the responsible party to provide the report within a given timeframe.

If a responsible party fails to sufficiently respond to a notice from the City by the response deadline, the inspector may issue a written warning. If the responsible party still fails to perform the necessary corrective actions, the inspector may issue an administrative citation.

Follow-up inspections conducted as a result of structural or treatment control BMP deficiencies will be performed. All enforcement actions will be documented appropriately in the development project's database file. If a development site receives frequent citations or is not responsive to previously issued enforcement actions, more severe actions, such as court actions, will be used as necessary.

6. Illicit Discharge Detection and Elimination Enforcement

The City implements and enforces its ordinances, orders, or other legal authority to prevent illicit discharges and illicit connections to its storm water conveyance system. If the City identifies the

source as a controllable source of non-storm water or as an illicit connection or an illicit discharge (IC/ID), administrative and judicial enforcement measures are used to eliminate IC/IDs.

If a complaint is received that indicates an IC/ID, City staff will conduct a field investigation for complaints with details suggesting an actual or potential discharge to the storm water conveyance system or receiving water body. If investigators find evidence of a violation with the potential to release pollutants or an actual IC/ID, every effort is made to find the responsible party and inform them of the complaint or issue a written warning. Parties found to be responsible for a violation or IC/ID are required to clean up or remove pollutants to the maximum extent practicable. Any refusal by the responsible party to perform cleanup of a violation or discharge will be handled by Code Compliance staff and appropriate enforcement actions will be taken.

The nature of the City's enforcement approach is determined on a case-by-case basis and is based on factors such as the severity of the violation, the threat to human or environmental health, site-specific circumstances, and past compliance history. If the situation is determined to pose an immediate risk to public health or the environment, the City may coordinate with other agencies or teams that are specially trained to assess and mitigate emergency situations as necessary (e.g., those involving hazardous wastes/materials, etc.). The discharge is also reported to the Regional Water Board as required by the Municipal Permit.

Additionally, water observed at major MS4 outfalls and traced to an anthropogenic source(s) is considered an illicit discharge. If the anthropogenic source(s) is/are found to be from a(n) industrial/commercial site, an inspection of the industrial/commercial facility will be performed in a timely manner to investigate the discharge. The inspection report will include a note describing that the inspection was prompted due to recent IC/ID discovery associated with MS4 outfall monitoring. If the anthropogenic source is found to be from a residential area, City staff may provide education and/or a written notification informing the responsible party of the illicit discharge and their responsibility to eliminate it. Follow-up inspections are conducted as necessary to ensure the discharge has been eliminated.

If the anthropogenic source is traced a municipal source, the enforcement actions discussed in Section 4 of the JRMP document is taken.

Any IC/ID observed to have potential to immediately impact human health or the environment is immediately reported to Code Compliance staff and the Fire Department, if necessary, and associated enforcement action(s) will be handled by Code Compliance staff.

B. Determining Enforcement Response to Noncompliance

When the City identifies any violation of the Municipal Code, NPDES permit, compliance order or other regulatory action, City personnel will determine the appropriate enforcement response on the basis of the type, frequency, magnitude, and duration of the violation, as well as on the violation's

potential impact to water quality and public health, safety or welfare, and any good faith efforts to comply with all regulations.

1. Types of Noncompliance

Violations of the Municipal Code, NPDES permits, orders and other regulatory actions may be characterized as administrative violations, monitoring violations, or discharge violations. The magnitude of each type of violation may be characterized as minor or major.

a. Administrative Violation

Administrative violations are generally a failure to provide any required report in a timely manner. Administrative violations may be minor or major.

i. Minor Administrative Violations

Minor administrative violations include, but are not limited to, a *single* instance of any of the following:

- Submitting an incomplete report or application;
- Submitting a late report or other required document;
- Failing to maintain or submit required records;
- Failing to conduct inspections, sampling or monitoring when required;
- Failing to report any spill or other required information; and
- Failing to pay required fees, penalties, or charges within forty-five calendar days from the due date.

ii. Major Administrative Violations

Major administrative violations are generally those violations related to recurring or prolonged noncompliance with reporting requirements or payment of required fees. Examples of major administrative violations include the following:

- Failing to respond to requests for information or administrative orders;
- Failing to meet a compliance date by more than forty-five (45) days;
- Falsifying documents or attempting to mislead the City in any manner;
- Engaging in a pattern of minor administrative violations;
- Refusing entry to authorized City personnel in the course of performing their assigned duties;
- Failing to produce records or accurately report noncompliance;
- Failing to pay any required fees, penalties, or charges within sixty (60) days from the due date; and
- Failing to obtain a required permit for any discharge.

b. Monitoring Violation

Monitoring violations are generally failures to sample or monitor, as required. Monitoring violations may be minor or major.

i. Minor Monitoring Violations

Minor monitoring violations include, but are not limited to, a *single* instance of any of the following:

- Failing to sample or resample within required timeframes;
- Improperly sampling, collecting, locating or analyzing;
- Failing to monitor for all required parameters;
- Failing to properly maintain monitoring equipment; and
- Failing to submit complete and accurate reports.

ii. Major Monitoring Violations

Major monitoring violations include, but are not limited to, the following:

- Repeated minor monitoring violations;
- Intentional tampering with or disabling monitoring equipment.

c. Discharge Violation

Discharge violations generally occur when a discharge fails to comply with any requirement set forth in an Ordinance, permit, order, or other regulatory mechanism. Discharge violations may be minor or major.

i. Minor Discharge Violations

Minor discharge violations are those that, either alone or in combination with other violations, pose no significant threat to any of the following: (A) the public health, safety or welfare, including any City employee or contractor, (B) the City's storm drain system, or (C) the environment. If the following violations do not pose a significant threat, they may be considered minor discharge violations:

- Failing to inform the City of a change in ownership.

ii. Major Discharge Violations

Major discharge violations are those that, either alone or in combination with other violations, pose a threat to any of the of the following: (A) the public health, safety or welfare, including any City

employee or contractor, (B) the City's storm drain system, or (C) the environment. Major discharge violations include, but are not limited to, the following:

- Any discharge that causes or contributes to damage to the storm drain system;
- Any discharge that causes or contributes to a violation of the Permit or any receiving water limitation;
- Any discharge made without a required permit;
- Any discharge made with an expired, suspended or revoked permit;
- Any discharge made in violation of compliance order, cease and desist order or other order or agreement;
- Any discharge that does not comply with a current discharge permit or plan;
- Failing to repair or replace any defective control device, as required by the City;
- Failing to implement any BMP or control device; and
- Failing to correct a minor discharge violation within a specified time period.

d. Unclassified Violation

The City Manager may, in his or her sole discretion, treat any violation that is not otherwise classified herein, as a minor or major violation. The City Manager will consider the type, frequency, magnitude, and duration of the violation, as well as the violation's potential impact to water quality and public health, safety or welfare, and any good faith efforts to comply with all regulations.

2. Types of Enforcement Responses

The City uses a range of enforcement responses to ensure compliance with the Ordinance. Three types of enforcement responses – administrative, civil, and criminal – range from an informal conversation to civil and criminal actions. Some intentional violations may constitute criminal violations of federal, state, and local laws, and the City Manager may seek the assistance of the Environmental Protection Agency or the City Attorney to implement an appropriate enforcement action. This section describes the range of available enforcement responses. Nothing in this ERP limits the City's authority to issue any other order or take any other enforcement action deemed necessary to protect the storm drain system, public health, safety and welfare, or the environment.

a. Administrative Enforcement Responses

The various administrative enforcement measures employed by the City include both verbal and written courtesy notices and warnings, Notices of Violation (NOVs), compliance orders, cease and desist orders, permit revocation, nuisance abatement, stop work orders, enforcement of contracts, administrative citations and monetary penalties, cost recovery, referral to the Regional Water Board, and ineligibility for land development.

i. Written and Verbal Warnings

A written or verbal warning is typically the City's first level of enforcement action when a violation of the Ordinance is observed such as a prohibited non-storm water discharge or a direct connection to the City's storm water conveyance structures. The intent is to point out a problem and encourage compliance without taking a formal enforcement action. Written warnings can be given using a variety of methods including cleanup orders, NOVs, cease and desist orders, and notices and orders to clean, test, or abate.

When written warnings are issued, the violation is noted, a time frame to correct the violation is given, and a follow-up date is scheduled. City staff follow-up with violations as necessary to determine whether or not compliance has been achieved.

ii. Notice of Violation

An NOV may be issued in response to any violation of the Ordinance, any permit, or any order issued by the City. An NOV identifies the provision of any ordinance, permit, or order which has been violated and establishes a compliance date. (SMC § 13.42.200.)

If it is determined by an authorized enforcement staff, meaning any City employee or contractor hired by the City who is assigned to duties involving permits and other City approvals, inspections, or enforcement, that the public interest requires the posting of bond or other security to assure the violation is corrected, such bond or security may be required by the authorized enforcement staff.

iii. Compliance Order

A compliance order may be issued in response to any violation of the Ordinance, any permit, or any order issued by the City. A compliance order specifies the provision of any ordinance, permit, or order which has been violated and establishes a compliance date or schedule. (SMC § 13.42.200.) A compliance order may direct that treatment facilities, devices, or monitoring equipment be installed, that best management practices be utilized, or that self-monitoring and reporting or other actions necessary and appropriate to assure timely compliance with the City's Ordinance be undertaken. A compliance order may contain a compliance schedule with milestones, action plans, compliance meetings, or other measures necessary to achieve and maintain compliance.

iv. Cease and Desist Order

A cease and desist order may be issued to gain immediate compliance when a violation poses a threat to the storm drain system, environment, or public health, safety and welfare. (SMC § 13.42.200.) A cease and desist order may also be issued to any person who violates any ordinance, permit, or order

and may order immediate cessation of impermissible activities, immediate resolution of any source or cause of a continuing violation, and immediate cleanup of any area affected by a violation.

v. Permit Revocation

Violations of the City's Municipal Code may be grounds for permit and/or other city license suspension or revocation in accordance with Santee Municipal Code Chapter 5.02. (SMC § 13.42.160.) City permits, licenses, or other approvals may be suspended or revoked after notice and an opportunity for a hearing. For instance, in severe cases of non-compliance, or significant discharges relating to development and/or construction activities, the City may revoke the building or grading permits that a contractor is working under for the project or deny future permits on the project. The responsible party will then need to re-apply for permits and meet the requirements the City may have placed on the project before resuming the project.

vi. Public Nuisance Abatement

Violations that are deemed to be a threat to public health, safety, and welfare may be identified as a public nuisance and abated by the City. (SMC § 13.42.190.) The City is authorized to abate a declared nuisance that is not completely abated by the owner, lessee, occupant or person having charge or control of the property within the time prescribed by the City. (SMC § 8.60.140.) Violations which create an immediate threat to the public health, safety and welfare may be summarily abated. City costs for pollution detection and abatement, if not paid in full by the discharger in addition to any other penalties, may be made a lien against the property in accordance with the abatement procedure. Costs for pollution detection and abatement may be recovered from the discharger in addition to any other penalties. (SMC § 13.42.190).

vii. Stop Work Orders

Whenever any work is being done contrary to the City's Municipal Code, or other laws or ordinances, an authorized enforcement official or authorized enforcement staff may order the work stopped by notice in writing to any person engaged in doing or causing such work to be done. (SMC § 15.58.950.) Any person receiving a Stop Work Order is required to immediately stop such work until approved by the authorized enforcement official or authorized enforcement staff to proceed with the work.

The City can issue a Stop Work Order for enforcement of required BMPs at construction or industrial/commercial sites. Stop Work Orders are typically given if written warnings have been issued and the violation has not been corrected, or if an observed violation poses a significant threat to water quality. Stop Work Orders prohibit further activity until the problem is resolved. The Stop Work Order will describe the infraction and specify what corrective action must be taken. A copy of the Stop Work Order will be given to the owner or contractor and placed in the site's active inspection file.

To restart work once a Stop Work Order has been issued, the responsible party must request that a City inspector re-inspect the site to verify that the deficiencies have been satisfactorily corrected. Once the inspector or authorized enforcement official verifies that the appropriate corrections have been implemented, activities may resume. (SMC § 15.58.950.)

viii. Enforcement of Contracts

If a contractor is performing work for the City, leasing City property, or otherwise contracts with the City, then the City may use the provisions within the contract for enforcement of non-compliance. Such contract provisions may allow the City to refuse payment, stop work (without time penalties), and/or revoke contracts if contractors performing activities do not comply with all appropriate permits, laws, regulations, and ordinances.

ix. Administrative Citations and Monetary Penalties

The City's authorized enforcement staff may issue storm water field citations for violations of the Ordinance or the Municipal Permit. Violations may be subject to administrative citation and/or fine issued under Municipal Code Chapter 1.14. (SMC § 13.42.160.)

Administrative penalties assessed pursuant to Santee Municipal Code section 13.42.160 shall be assessed at a maximum rate of $100 for a first violation. The maximum rate shall not exceed $1,000 per violation per day. The fine amounts shall be cumulative where multiple citations are issued. Administrative citations may be appealed in accordance with Santee Municipal Code Chapter 1.14.

When an administrative citation is issued, the responsible party may request a hearing to contest the enforcement official's determination that a violation of the City's storm water requirements has occurred. Details on the City's hearing and appeals process can be found in section 1.14.060 of the Santee Municipal Code.

x. Cost Recovery

Any person who violates any provision of the Ordinance is liable for all costs incurred by the City to investigate, remedy, and prosecute such violation, including but not limited to attorneys' fees. (SMC § 13.42.160(D).)

xi. Referral to the Regional Water Board

The City refers violations of the Ordinance to the Regional Water Board for enforcement action in accordance with the requirements of the Municipal Permit or plans adopted pursuant to the Municipal Permit. (SMC § 13.42.200(B).)

xii. Ineligibility for Land Development

Any person who fails to perform work on a priority development project, construction project, or land disturbing activity obtaining and complying with a standard storm water quality management plan, storm water pollution prevention plan, or other plan as required by the Ordinance may be ineligible to continue development or construction activities.

In such a case, the City will serve the owner with a notice of intent to file a notice of ineligibility for land development, and a hearing will be held pursuant to the process outlined in Santee Municipal Code section 13.42.160(F). During the effective dates of a notice of ineligibility, no application for a building permit, administrative permit, site plan, use permit, variance, tentative parcel map, tentative map, parcel map or final map or any other permit for the development of the property on which the violation occurred and which resulted in the notice of ineligibility will be approved.

A notice of ineligibility will remain in effect until the enforcement official files a "Release of Notice of Ineligibility for Land Development." The Release may be filed when the owner implements all required plans and BMPs and remedies any noncompliant site conditions to the Director's satisfaction. (SMC § 13.42.160(F).)

b. Civil Enforcement Responses

The City Attorney is authorized to file civil actions and to seek civil penalties and/or other remedies to enforce the City's ordinances. The penalty for a storm water infraction will be relatively minor for a first offense, but repeated violations will result in escalating fines or misdemeanor charges. There is no requirement that administrative enforcement procedures be pursued before such actions are filed.

i. Injunctive Relief

The City may pursue enforcement by judicial action for preliminary or permanent injunctive relief for any violation of the Storm Water Management Ordinance. (SMC § 13.42.220.)

ii. Civil Action

Civil actions include, but are not limited to, civil abatement actions, injunctions, cost recovery, compensatory damages. (SMC § 13.42.220.) These remedies may be used in addition to other remedies do not limit any other remedies, civil or criminal. (SMC § 13.42.230.)

iii. Arrest or Field Citation

Authorized enforcement staff may arrest without a warrant any person whenever the authorized enforcement staff member has reasonable cause to believe that the person has committed a violation of

the Municipal Code, including the Ordinance, or applicable state codes in his or her presence. Pursuant to California Penal Code Section 836.5 the authorized enforcement official can only arrest a person by issuing a misdemeanor field citation.

c. Criminal Enforcement Responses

The City Attorney is authorized to file criminal actions to enforce the Ordinance. It is unlawful for any person, firm, corporation, or other responsible entity to violate any provision or fail to comply with any of the restrictions or requirements of the Municipal Code, including the Storm Water Ordinance. Notwithstanding any other provisions of the Santee Municipal Code, any person who knowingly or intentionally violates any provision of the Storm Water Management Ordinance is guilty of a misdemeanor punishable by imprisonment in the County Jail for a period not to exceed one year, or a fine not to exceed ten thousand dollars for each day a violation exists, or both. (SMC § 13.42.160(B).)

3. Criteria for Determining Response to Noncompliance

The previous sections described the types of violations likely to occur and the types of enforcement responses available to the City. This section presents the criteria for determining the most appropriate response to each type of violation. In general, the appropriate enforcement response is determined by the following criteria: (a) the frequency and duration of the violation; (b) the nature, magnitude and potential impact of a violation on water quality or public health, safety or welfare; and (c) good faith efforts to maintain compliance or eliminate noncompliance.

a. Nature, Magnitude, and Effect of the Violation

Violations are evaluated against the potential or actual threat to the environment, to public health, safety and welfare, or to the storm drain system, created by the noncompliance. Any violation which poses a significant potential or actual threat may be considered a major violation. Some violations may be isolated and pose no potential or actual threat. These may be considered minor violations. Some violations, although isolated, may pose a significant potential or actual threat. These may be considered major violations.

b. Duration and Frequency of the Violation

The duration and frequency of a violation are independent factors in determining the appropriate enforcement response. Escalating enforcement actions are available to discourage or correct repeated, frequent, or long-standing violations.

c. Good Faith Efforts to Maintain Compliance or Eliminate Noncompliance

Efforts to maintain compliance or eliminate noncompliance may be considered when determining the appropriate enforcement response. Good faith efforts are prompt and vigorous control measures undertaken with extraordinary effort, rather than a "business-as-usual" approach. A history of compliance may include a person's efforts in maintaining equipment, utilizing best management practices, and developing and implementing programs to reduce waste and the discharge of pollutants. After assessing the nature, magnitude, effect, duration and frequency of a violation, the City may elect to mitigate an enforcement response on the basis of a person's good faith efforts to maintain compliance or eliminate noncompliance. In no case, however, will an enforcement response be mitigated to such an extent as to permit any harm or threat to the public health, safety or welfare, the environment, or the storm drain system.

C. Enforcement Response Timelines

As required by the Municipal Permit, City staff will seek to resolve incidents of observed non-compliance within 30 calendar days, or prior to the next rain event, whichever is sooner. The City will notify the Regional Water Board in writing within five (5) calendar days of issuing escalated enforcement to a construction site that poses a significant threat to water quality as a result of violations or other non-compliance with its permits and applicable local ordinances, as required by the Municipal Permit.

The City endeavors to respond within twenty-four (24) hours to major violations posing a threat to public health, safety or welfare, the environment, or the storm drain system. The actual response time may be shorter or longer, depending on any emergent or mitigating circumstances. In cases where the violation cannot be resolved within the appropriate timeframe, the reason additional time was need for case resolution will be documented and kept on file.

D. Personnel Responsibilities and Abbreviations

Specific personnel determine and implement appropriate enforcement responses. The following abbreviations are used in the ERP Guide to indicate personnel responsible for each enforcement response:

CM	City Manager or authorized designee
PW	Public Works Director or authorized designee
CA	City Attorney, at the direction of the City Manager or City Council

The following abbreviations are used in the ERP Guide to indicate type of enforcement response:

W	Warning
NOV	Notice of Violation
CO	Compliance Order

CDO	Cease and Desist Order
PR	Permit Revocation
MP	Monetary Penalty
CR	Cost Recovery
RWB	Referral to Regional Water Board
ILD	Ineligibility for Land Development
PNA	Public Nuisance Abatement
SNA	Summary Nuisance Abatement
SWO	Stop Work Order
EC	Enforcement of Contracts
Civ	Civil Enforcement
Crim	Criminal Enforcement

III. ENFORCEMENT RESPONSE PLAN – GUIDE

A. Administrative Violations

Type of Violation	Nature, Magnitude, Frequency, Duration, Effect of Violation	Enforcement Response(s)	Responsible Person
Submitting an incomplete report or application	1st violation	W, NOV	PW, PW
	2nd violation	CO, NOV, MP, EC	PW, PW, CM, PW
	Major violation	CO, MP, Civ, CR, EC	PW, CM, CA, CA, PW
Submitting a late report or other required document	1st violation	W, NOV	PW, PW
	2nd violation	CO, NOV, MP, EC	PW, PW, CM, PW
	Major violation	CO, MP, Civ, CR, EC	PW, CM, CA, CA, PW
Failing to submit or maintain required records	1st violation	W, NOV	PW, PW
	2nd violation	CO, NOV, MP, EC	PW, PW, CM, PW
	Major violation	CO, MP, Civ, CR, EC	PW, CM, CA, CA, PW
Failing to conduct inspections, sampling or monitoring when required	1st violation	W, NOV	PW, PW
	2nd violation	CO, NOV, MP, CR, EC	PW, PW, CM, CA, PW
	Major violation	CO, MP, Civ, CR, EC	PW, CM, CA, CA, PW
Failing to report any spill or other required information	1st violation	W, NOV	PW, PW
	2nd violation	CO, NOV, MP, EC	PW, PW, CM, PW
	Major violation	CO, MP, Civ, CR, EC	PW, CM, CA, CA, PW
Failing to pay required fees, penalties, or charges within forty-five calendar days from the due date	1st violation	W, NOV	PW, PW
	2nd violation	CO, NOV, MP, CR, EC	PW, PW, CM, CA, PW
	Major violation	CO, MP, Civ, CR, EC	PW, CM, CA, CA, PW
Failing to respond to requests for information or administrative orders	1st violation	W, NOV	PW, PW
	2nd violation	CO, NOV, MP, EC	PW, PW, CM, PW
	Major violation	CO, MP, Civ, CR, EC	PW, CM, CA, CA, PW
Failing to meet a compliance date by more than forty-five (45) days	1st violation	W, NOV	PW, PW
	2nd violation	CO, NOV, MP, CR, EC	PW, PW, CM, PW
	Major violation	CO, MP, Civ, CR, EC	PW, CM, CA, CA, PW
Falsifying documents or attempting to mislead the City in any manner	1st violation	CO, CDO, PR	PW, PW, CM
	2nd violation	PR, MP, EC	CM, CM, PW
	Major violation	Civ, Crim, CR, EC	CA, CA, CA, PW
Refusing entry to authorized City personnel in the course of performing their assigned duties	1st violation	CO, CDO, PR	PW, PW, CM
	2nd violation	PR, MP, EC	CM, CM, PW
	Major violation	Civ, Crim, CR, EC	CA, CA, CA, PW
Failing to produce records or accurately report noncompliance	1st violation	W, NOV	PW, PW
	2nd violation	CO, NOV, MP, EC	PW, PW, CM, PW
	Major violation	CO, MP, Civ, CR, EC	PW, CM, CA, CA, PW
Failing to pay any required fees, penalties, or charges within sixty (60) days from the due date	1st violation	W, NOV	PW, PW
	2nd violation	CO, NOV, MP	PW, PW, CM
	Major violation	CO, MP, Civ, CR	PW, CM, CA, CA

Failing to obtain a required permit for any discharge	1st violation 2nd violation Major violation	CO, CDO, PR, RWB PR, MP, RWB, EC Civ, Crim, RWB, CR, EC	PW, PW, CM, PW CM, CM, PW, PW CA, CA, PW, PW
Major violation: repeated minor violation or <u>any</u> violation that harms or threatens the public health, safety or welfare, the environment, or the storm drain system.			

B. Monitoring Violations

Type of Violation	Nature, Magnitude, Frequency, Duration, Effect of Violation	Enforcement Response	Responsible Person
Failing to sample or resample within required timeframes	1st violation 2nd violation Major violation	CO, CDO, PR, EC PR, MP, EC Civ, Crim, CR, EC	PW, PW, CM, PW CM, CM, PW CA, CA, CA, PW
Improperly sampling, collecting, locating or analyzing	1st violation 2nd violation Major violation	CO, CDO, PR, EC PR, MP, EC Civ, Crim, CR, EC	PW, PW, CM, PW CM, CM, PW CA, CA, CA, PW
Failing to monitor for all required parameters	1st violation 2nd violation Major violation	CO, CDO, PR, EC PR, MP, ILD, EC Civ, Crim, ILD, CR, EC	PW, PW, CM, PW CM, CM, PW, PW CA, CA, PW, CA, PW
Failing to submit complete and accurate monitoring reports	1st violation 2nd violation Major violation	W, NOV, EC CO, NOV, MP, ILD, EC CO, MP, Civ, ILD, CR, EC	PW, PW, PW PW, PW, CM, PW, CA, PW PW, CM, CA, PW, CA, PW
Intentional tampering with or disabling monitoring equipment or BMPs.	1st violation 2nd violation Major violation	NOV, CDO, CO, EC PR, PNA, SNA, ILD, CR, EC PR, PNA, SNA, Civ, Crim, CR, EC	PW, PW, PW, PW CM, CM, CM, PW, CA, PW CM, CM, CM, CA, CA, CA, PW
Major violation: repeated minor violation or <u>any</u> violation that harms or threatens the public health, safety or welfare, the environment, or the storm drain system.			

C. Discharge Violations

Type of Violation	Nature, Magnitude, Frequency, Duration, Effect of Violation	Enforcement Response	Responsible Person
Failing to inform the City of a change in ownership	1st violation 2nd violation Major violation	W, NOV, EC CO, NOV, MP, EC CO, MP, Civ, CA, EC	PW, PW, PW PW, PW, CM, PW PW, CM, CA, CA, PW
Discharge causes or contributes to damage to the storm drain system	1st violation 2nd violation Major violation	NOV, CDO, CO, RWB, ILD, EC PR, PNA, SNA, RWB, ILD, EC PR, PNA, SNA, Civ, Crim, RWB, ILD, CR, EC	PW, PW, PW, PW, PW, PW CM, CM, CM, PW, PW CM, CM, CM, CA, CA, PW, PW, CA, PW
Discharge causes or contributes to a violation of the Permit or any receiving water limitation	1st violation 2nd violation Major violation	NOV, CDO, CO, RWB, EC PR, PNA, SNA, RWB, ILD, EC PR, PNA, SNA, Civ, Crim, RWB, ILD, CR, EC	PW, PW, PW, PW, PW CM, CM, CM, PW, PW, PW CM, CM, CM, CA, CA, PW, PW, CA, PW
Discharge made without a required permit or plan	1st violation 2nd violation Major violation	CO, CDO, PR, RWB, EC PR, MP, RWB, ILD, EC Civ, Crim, RWB, ILD, CR, EC	PW, PW, CM, PW, PW CM, CM, PW, PW, PW CA, CA, PW, PW, CA, PW
Discharge made with an expired, suspended or revoked permit	1st violation 2nd violation Major violation	CO, CDO, PR, RWB, EC PR, MP, RWB, ILD, EC Civ, Crim, RWB, ILD, CR, EC	PW, PW, CM, PW CM, CM, PW, PW, PW CA, CA, PW, PW, CA, PW
Discharge does not comply with a current discharge permit or plan	1st violation 2nd violation Major violation	CO, CDO, PR, RWB, EC PR, MP, RWB, ILD, EC Civ, Crim, RWB, ILD, CR, EC	PW, PW, CM, PW, PW CM, CM, PW, PW, PW CA, CA, PW, PW, CA, PW
Failing to implement spill control, best management practices, or other plans required by the City	1st violation 2nd violation Major violation	CO, CDO, PR, RWB, EC PR, MP, RWB, ILD, EC Civ, Crim, RWB, ILD, CR, EC	PW, PW, CM, PW, PW CM, CM, CM, PW, PW, PW CA, CA, CM, PW, PW, CA, PW
Discharge in violation of compliance order, cease and desist order or other order or agreement	1st violation 2nd violation Major violation	NOV, CDO, CO, RWB , EC PR, PNA, SNA, RWB, ILD, EC PR, PNA, SNA, Civ, Crim, RWB, ILD, CR, EC	PW, PW, PW, PW, PW CM, CM, CM, PW, PW, PW CM, CM, CM, CA, CA, CA PW, PW, CA, PW
Failing to correct a minor discharge violation within a specified time period	1st violation 2nd violation Major violation	CO, CDO, PR, EC PR, MP, EC Civ, Crim, CR, EC	PW, PW, CM, PW CM, CM, PW CA, CA, CA, PW
Failing to implement any required BMP or control	1st violation 2nd violation Major violation	CO, CDO, PR, RWB, EC PR, MP, RWB, ILD, EC Civ, Crim, RWB, ILD, CR, EC	PW, PW, CM, PW , PW CM, CM, PW, PW, PW CA, CA, PW, PW, CA,

			PW
Failing to repair or replace defective control device, as required by City	1st violation 2nd violation Major violation	CO, CDO, PR, EC PR, MP, EC Civ, Crim, CR, EC	PW, PW, CM, PW CM, CM, CM, PW CA, CA, PW
Major violation: repeated minor violation or <u>any</u> violation that harms or threatens the public health, safety or welfare, the environment, or the storm drain system.			

City of Santee

Guidelines for Surface Water Pollution Prevention

June 2015

10601 Magnolia Avenue, Department of Development Services, Building 4

www.santeeh2o.org

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Table of Contents

Tables

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1 Introduction

1.1 Guidelines for Surface Water Pollution Prevention

The City of Santee (City) Guidelines for Surface Water Pollution Prevention (hereafter, "Manual") supports the City's Storm Water Management and Discharge Control Ordinance (Storm Water Ordinance), codified as Santee Municipal Code Chapter 13.42. The Manual also supports as the water quality protection provisions of Municipal Code Chapters 15.58, Excavation and Grading. Moreover, the Manual is not a stand-alone document but must be read with applicable parts of the aforementioned chapters of the Municipal Code (collectively, "Ordinances"). In general, this Manual categorically and explicitly establishes what dischargers must do to comply with the Ordinances and to receive permits for projects and activities that are subject to them. The Manual and the Ordinances have been prepared to provide the City with the respective legal authority and administrative actions necessary to comply with the requirements of California Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 (Municipal Permit).

1.2 Purposes and Use

The Manual establishes minimum storm water management requirements and controls to address the highest priority water quality condition (HPWQC) in the Water Quality Improvement Plan (WQIP) for the San Diego River Watershed Management Area (WMA). Further, the Manual supports the following objectives stated in Section 13.42.020 of the Storm Water Ordinance:

1. Effectively prohibiting non-storm water discharges to the storm water conveyance system.
2. Eliminating illicit discharges and illicit connections to the storm water conveyance system.
3. Reducing the discharge of pollutants from the storm water conveyance system, to the maximum extent practicable in order to achieve applicable water quality objectives for surface waters in San Diego County.
4. Achieving compliance with Total Maximum Daily Load regulations.

In the San Diego River WMA, bacteria has been identified as the HPWQC. During dry weather conditions, non-storm water flows transport bacteria and other pollutants. For this reason, the City has minimum requirements to effectively prohibit non-storm water discharges and will implement activities to reduce them. The requirements described in the Manual are primarily in the form of BMPs to be used to reduce the amount of pollutants discharged to the City's STORM WATER CONVEYANCE SYSTEM. The Manual is intended to provide direction to

residents, businesses, contractors, developers, and City staff about what is necessary to meet the City's storm water requirements. All terms used in the Manual have the same meaning as defined in Municipal Code Chapter 13.09, unless otherwise noted.

2 Other Applicable Regulations

The Manual describes storm water BMPs required by the City of Santee. Some actions and activities associated with storm water BMP requirements may be subject to additional requirements or approvals, such as other City departments or non-municipal agencies. Other agencies, such as the RWQCB, the US Army Corps of Engineers, and the County of San Diego Department of Environmental Health, may also have applicable requirements. Complying with the BMPs described in the Manual does not ensure compliance with all other regulatory requirements, including requirements of other agencies. Dischargers are responsible for determining what other requirements may apply, if any, and taking actions as necessary to comply with them.

Discharges to the sanitary sewer system may require approval from the City's Community Services Department's Public Services Division. Call (619) 258-4195 for more information. Structural improvements to properties, such as building an overhead canopy, may require City permits. Contact Development Services Department's Building Division at (619) 258-4100 (x155) for more information.

3 Minimum BMP Requirements

This section presents minimum BMP requirements for the following land uses, activities, and projects within the City:

- Industrial, commercial, and municipal facilities or areas
- Residential areas
- Construction sites
- Development projects (post-construction BMPs)

These are the minimum BMP requirements that must be implemented for applicable activities. However, additional consideration should be given to the following:

- Due to site-specific conditions, some BMP requirements reference terms such as "where applicable" or "where feasible." These terms require that BMPs be implemented at the discretion and with the final determination made by City personnel or their designees (i.e., contract staff). City staff or their designees also have the authority to require additional BMPs, if necessary, to comply with the Storm Water Ordinance and/or the Municipal Permit.

- References to "CASQA Factsheets" refer to factsheets in manuals prepared by the California Stormwater Quality Association (CASQA). CASQA materials can be accessed at www.casqa.org. Some materials may not be viewable without a paid subscription.

3.1 Industrial, Commercial, and Municipal

Minimum BMP requirements for industrial, commercial, and municipal sites and activities are provided in Table 1. These BMPs have been developed, and are supported by, factsheets adopted by the CASQA[1]. City exceptions to the procedures described in the CASQA factsheets are identified in footnotes. Where any conflict may exist between CASQA factsheets and requirements in the Manual or the Municipal Code, the requirements of the Manual and the Municipal Code shall prevail. Complying with the BMPs described in the Manual does not ensure compliance with all other regulatory requirements, including requirements of other agencies. See Section 2 for more information about other potentially applicable requirements.

[1] CASQA (2015). *Stormwater Best Management Practice Portal: Industrial and Commercial*. www.casqa.org.

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Table 1. Minimum Best Management Practices (BMPs) for Industrial, Commercial, and Municipal Sites/Sources

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
These best management practices (BMPs) are applicable to all industrial, commercial, and municipal facilities and activities. The BMPs listed in this table are the minimum required BMPs; however, additional tools and education may be necessary to facilitate BMP implementation onsite. Additional BMPs may include 1) developing a written BMP plan, 2) conducting regular training on BMP implementation, and 3) stenciling storm drains. A BMP plan is a site-specific or mobile activity-specific written plan that identifies applicable BMPs and provides clear instructions on proper BMP implementation. Staff should be regularly trained on the minimum BMP requirements and how they are met for a particular facility or activity. Storm drain stenciling promotes storm water awareness and may include concrete stamps, painted stencils, signs, and the installation of ceramic or plastic tiles. Storm drain signage should include a message similar to "No Dumping – Drains to Ocean".			
Discharge Control			
1	Eliminate illicit connections to the MS4.	Illicit connections are man-made physical connections to the municipal separate storm sewer system (MS4) that convey an illicit discharge. Find and abate all illicit connections to the MS4 through properly approved procedures, permits, and protocols.	SC-10, SC-44
2	Eliminate illicit non-storm water discharges.	Non-storm water (water other than rain) shall not be discharged to the City of Santee's (City) MS4. To eliminate illicit discharges, do not allow any solid or liquid material except uncontaminated storm water to enter City storm drains, curb gutters along City streets, or any other part of the City's MS4. Non-storm water discharged to the MS4 as a result of emergency or non-emergency firefighting activities, both emergency and non-emergency activities, is considered an illicit discharge if the City or the California Regional Water Quality Control Board, San Diego Region (RWQCB) identifies the discharge as a significant source of pollutants to receiving waters. Other limited exceptions may apply. During emergency situations, priority of efforts is directed toward life, property, and the environment (in descending order). The City's minimum BMPs should be implemented, but should not interfere with immediate emergency response operations or impact public health and safety.	SC-10, SC-11, SC-44

Table 1. Minimum Best Management Practices (BMPs) for Industrial, Commercial, and Municipal Sites/Sources (continued)

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
3	Properly dispose of process and wash water.	All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer or removed by an appropriate waste hauler. Wash water which does not contain chemicals or oil/grease, may be discharged to landscaping or other pervious surfaces.	SC-10, SC-41[2]
4	Eliminate the discharge of vehicle and equipment wash water.	This BMP is applicable to all industrial, commercial, and municipal facilities and activities, regardless of whether the activity is conducted by the facility owner/operator, lessee, contractor, or other persons. Water associated with washing activities shall not be allowed to enter City storm drains, curbs and gutters, or any other part of the City's MS4. When washing is conducted outside permanent designated wash areas, all wash water must be contained, captured, and disposed of appropriately. Designated washing areas may consist of a container, a berm, or a liner to collect and contain liquids and prevent runoff. Use of a control nozzle or similar mechanism is required to maximize control over the quantity of water used. Allowing contained water to evaporate is an acceptable method of disposal only if any remaining residue is removed to prevent future pollutant discharges. Captured wash water may be disposed through the sanitary sewer system with the approval of the City's Community Services Department's Public Services Division. Contact the Public Services Division at (619) 258-4195 for approval of any discharges to the sanitary sewer system; businesses are responsible for obtaining necessary permits. Wash water containing oil, paint, or other hazardous waste should be disposed of properly in accordance with applicable regulations. If only biodegradable soaps and uncontaminated water are used, wash water may be directed to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the MS4 or any adjacent property. This can be accomplished by washing the vehicle on a landscaped area or using a berm to direct wash water to a landscaped area.	SC-10, SC-21

[2] Factsheet SC-41 - Building & Grounds Maintenance, states (in regards to pressure washing), "If soaps or detergents are not used, and the surrounding area is paved, wash runoff does not have to be collected but must be screened. Pressure washers must use filter fabric or some other type of screen on the ground and/or in the catch basin to trap the particles in wash water runoff." Non-storm water discharges of this nature, even if filtered, are not allowed to enter the MS4. Wash water must be contained, collected, and disposed of properly.

Table 1. Minimum Best Management Practices (BMPs) for Industrial, Commercial, and Municipal Sites/Sources (continued)

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
5	Properly dispose of water from fire sprinkler maintenance activities.	Fire sprinkler system discharges often contain corrosion inhibitors, fire suppressants, or antifreeze shall be disposed through the sanitary sewer system, not the MS4. Fire sprinkler system discharges without corrosion inhibitors, fire suppressants, or antifreeze shall be disposed through the sanitary sewer, if practicable. When not practicable to discharge to the sanitary sewer system due to the presence of prohibited contaminants, the water shall be collected and disposed of by an appropriately certified party. When not practicable to discharge to the sanitary sewer system for reasons other than the presence of prohibited contaminants, the water may be discharged to an impervious or landscaped area as long as it does not create erosion, or run off from the area. Adequate precautions must be taken to prevent the transport of pollutants to the MS4.	SC-10, SC-41
6	Eliminate irrigation runoff.	Irrigation runoff to the MS4 shall be eliminated through proper landscape maintenance and watering practices. All irrigation water and associated pollutants from nurseries, garden centers, and similar facilities shall be prevented from reaching City storm drains, curb gutters along City streets, or any other part of the City's MS4.	SC-10[3], SC-41
7	Eliminate air conditioning condensation discharges.	Air conditioning condensation discharges shall be controlled from reaching City storm drains, curb gutters along City streets, or any other part of the City's MS4 and are prohibited from entering the City's MS4	Ordinance
8	Eliminate floor mat cleaning discharges.	Floor mats shall be cleaned in a manner such that there is no discharge to City storm drains, curb gutters along City streets, or any other part of the City's MS4. Indoor wash areas, mop sinks, or indoor floor drains may be designated as wash areas for floor mats if these areas drain to the sanitary sewer system.	SC-10, SC-21

[3] Factsheet SC-10 – Non-Stormwater Discharges states that "landscape irrigation drainage and landscape watering" may be discharged to the storm drain with conditions; however, in accordance with the Municipal Permit, no irrigation runoff may be discharged to the City's MS4.

Table 1. Minimum Best Management Practices (BMPs) for Industrial, Commercial, and Municipal Sites/Sources (continued)

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
9	Eliminate pumped groundwater, foundation, and footing drain discharges.	Pumped groundwater, including water from crawl space pumps is prohibited unless a separate National Pollutant Discharge Elimination System (NPDES) permit has been obtained to cover the discharge, or the RWQCB has determined in writing that no permit is needed. Discharges from foundation and footing drains that are at or below the groundwater table are also prohibited, unless covered by an NPDES permit, or the RWQCB has determined in writing that no permit is needed.	SC-10
10	Minimize rising groundwater, diverted stream flows, uncontaminated groundwater infiltration, springs, riparian habitat/wetland flows, potable water sources, and foundation/ footing drain discharges.	Discharges from rising groundwater, diverted stream flows, riparian habitat and wetlands, uncontaminated groundwater infiltration to the MS4, springs, and potable water sources are exempt unless they are identified as a source of pollutants to receiving waters by the City or the RWQCB.	SC-10
11	Direct runoff from pavement, rooftops, and other impervious surfaces to landscaped areas.	Runoff from pavement, rooftops, and other impervious surfaces shall be directed to landscaped or pervious area(s) to infiltrate or evaporate, where suitable areas exist onsite. Energy dissipation and erosion control measures shall be used to prevent erosion and sediment transport. Where possible, divert runoff collected on roofs, canopies, and other coverings from discharging into areas of potential pollutant use or storage. Downspouts should be directed to avoid critical areas such as loading/unloading areas, fueling, fabrications, lead tool, and dye storage of hazardous waste storage areas. If possible, divert run-on generated by neighboring facilities or adjacent properties before it can enter the site grounds. This should be done in such a manner as to prevent flooding of adjacent property. Berming, diversion ditches, and dikes can direct flow away from the site.	SC-10

Table 1. Minimum Best Management Practices (BMPs) for Industrial, Commercial, and Municipal Sites/Sources (continued)

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
12	Regularly clean and maintain structural BMPs, including LID installations, to ensure proper performance.	BMPs implemented, including Low Impact Development (LID) and structural BMPs, must be inspected at a minimum annually, and properly operated and maintained. All installed LID or structural BMPs shall be inspected at a minimum of once annually for proper function and maintained to confirm the BMP is serving the purpose for which it was intended.	SC-44
Erosion and Sediment Control			
13	Protect unpaved areas, including landscaping, from erosion using vegetative or physical stabilization.	Exposed soils that are actively eroding or prone to erosion due to disturbance shall be protected from erosion. Significant accumulations of eroded soil shall be removed or contained to prevent sediment transport in runoff to the MS4.	SC-40, SC-42
Good Housekeeping			
14	Regularly clean parking areas.	Paved parking lots, roads, and driveways located on the property shall be cleaned as needed to prevent pollutants from entering the City's MS4, including the curb and gutter. Sweeping is the preferred method of cleaning. Wet cleaning methods, such as mopping or power washing, may be substituted for sweeping if all wash water is contained, captured, and disposed of appropriately.	SC-41, SC-43, BG-62[4]
15	Implement good housekeeping to keep site free of trash and debris.	Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris.	SC-41

[4] Factsheet BG-62 – Mobile Cleaning – Surface Cleaning, states (in regards to pressure washing) that screened, or filtered, wash water can be discharged to a gutter, street, or storm drain. Non-storm water discharges of this nature, even if filtered, are not allowed to enter the MS4, which includes the streets and gutters. Wash water must be contained, collected, and disposed of properly.

Table 1. Minimum Best Management Practices (BMPs) for Industrial, Commercial, and Municipal Sites/Sources (continued)

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
16	Keep storm drain inlets and under drains free of sediment, trash, and debris.	Accumulated materials shall be removed from on-site storm drains and under drains at least once per year.	SC-44
Material Storage and Handling			
17	Provide and maintain secondary containment to catch spills if storing liquid pollutants in outdoor areas.	Drums and other containers shall be kept in good condition and securely closed when not in use. Effective secondary containment shall be provided and maintained for all containers of liquid with the potential to leak or to spill onto outdoor areas to prevent leaks or spills from discharging pollutants to the MS4. Secondary containment shall also be provided for all liquids during transport to prevent spills due to leaks or punctures. A variety of methods are available, including but not limited to: containers, curbs, and vendor products. To maintain the effectiveness of secondary containment, regularly remove and appropriately dispose of spills, precipitation, or other liquids that accumulate in the secondary containment. Provide liquid storage containers with covers to prevent precipitation from accumulating in or causing overflows from the secondary containment. If evidence of spills due to inadequate containment is observed, the City enforcement official may specify a minimum required containment capacity. Other applicable regulations may apply to the use of secondary containment, especially for hazardous materials, which are regulated by the County of San Diego Department of Environmental Health.	SC-20, SC-31
18	Cover, contain, and/or elevate materials stored outside that may become a source of pollutants in storm water or non-storm water.	Materials stored outdoors shall be covered, contained, and/or elevated to prevent storm water and non-storm water from contacting and/or transporting materials and pollutants to the MS4. Some examples of cover are roofs, awnings, and tarps. Where coverage is not feasible or is cost prohibitive, alternative approaches such as installing berms around the stored materials, directing runoff to pervious areas, or installing treatment devices may be allowed. Note that installing structural coverage will usually require obtaining permits from the City prior to installation. To determine applicable regulations and whether a permit would be required, contact the Development Services Department's Building Division at (619) 258-4100 (x155).	SC-20, SC-33

Table 1. Minimum Best Management Practices (BMPs) for Industrial, Commercial, and Municipal Sites/Sources (continued)

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
19	Properly store and dispose of hazardous materials.	Hazardous materials and wastes shall be stored, managed, and disposed in accordance with federal, state, and local laws and regulations. Hazardous materials and wastes and their primary storage containers shall also be stored such that they will not come into contact with storm water, even if leaks or spills occur. Hazardous materials and wastes generated by business activities are additionally regulated by the County of San Diego Department of Environmental Health. Disposal of hazardous wastes using an authorized hazardous waste collection service is required. Store hazardous materials and wastes, and their primary storage containers, with sufficient cover and/or containment to prevent contact with storm water. See BMPs 18 and 19 for additional details regarding storage.	SC-20, SC-31, SC-33
20	Label containers to prevent mishandling of hazardous materials and other potential pollutants.	Outdoor containers and storage areas of pollutants shall be labeled to facilitate proper material handling and spill response. Hazardous materials and wastes shall be clearly labeled in accordance with all applicable regulations.	SC-31
21	Minimize the amount of liquid cleaning agents and solvents used.	Reduce potential for pollution from cleaning agents such as soaps and detergents used in any maintenance operations including vehicles, equipment, aircraft or ship cleaning, metal work, and painting practices. Use products other than liquid cleaning agents to the maximum extent practicable; Substitute cleaning methods such as wire brush scraping or using a bake oven. Reuse solvents and use sparingly; pre-soak parts in "dirty" solvents before placing in fresh solvent to reduce volume of solvent used.	SC-22
22	Protect storage containers from being damaged by vehicles.	Prevent vehicle impact damage to storage containers by installing bollards, traffic barriers, fences, and curbs to protect containers stored in locations accessible to vehicles. Vehicles may damage storage containers leading to ruptures and cracks that may lead to significant spills and leaks.	SC-31

Table 1. Minimum Best Management Practices (BMPs) for Industrial, Commercial, and Municipal Sites/Sources (continued)

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
		Pesticide and Fertilizer Management	
23	Properly manage pesticides and fertilizers.	Pesticides and fertilizers shall be applied in strict accordance with manufacturer's label, as authorized by U.S. Environmental Protection Agency. Chemicals shall be stored safely in covered and contained areas. See BMPs 18 and 19 for additional details regarding storage. Waste products shall be disposed of in accordance with the manufacturer's label and applicable hazardous waste regulations. The use of integrated pest management (IPM) principles is encouraged to reduce or eliminate use of chemicals. For more information about integrated pest management, see the University of California Statewide IPM Program at http://www.ipm.ucdavis.edu.	SC-35, SC-41, BG-40
		Outdoor Work Areas	
24	Implement controls to minimize pollution from exposed outdoor work areas.	Activities that may generate pollutants shall be conducted in covered, contained areas, or equivalent measures taken to prevent the discharge of associated pollutants. In order to avoid contaminating storm water runoff, the following precautions shall be taken as appropriate: (1) move activities indoors;(2) cover areas where outdoor activities are performed, including building canopies; (3) protect areas where outdoor activities are performed from runoff from upstream areas, including building berms; (4) prevent spills or by-products from escaping contained areas; (5) do not conduct outdoor activities that may generate pollutants when it is raining; (6) protect storm drain inlets and ensure adequate spill response materials are readily available; and, (7) thoroughly clean outdoor work areas at least daily to remove accumulated sediment, debris, oil and grease, particulate matter, and other pollutants. Structural treatment devices shall also be installed to remove pollutants from contaminated runoff if source control BMPs are not effective.	SC-20, SC-30, SC-32, SC-34, SC-42
		Spill Prevention and Response	
25	Prevent or capture liquid leaks from vehicles and equipment.	Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles awaiting maintenance and during maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations.	SC-11, SC-22

Table 1. Minimum Best Management Practices (BMPs) for Industrial, Commercial, and Municipal Sites/Sources (continued)

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
26	Immediately contain and clean up spills.	Spills shall be cleaned up immediately and prevented from entering the MS4. Dry cleaning methods such as the use of rags and absorbents are preferred cleaning methods. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the City's Storm Water Hotline at (619) 258-4100 (x168).	SC-11
27	Maintain a readily accessible spill cleanup kit that is appropriate for the type of materials stored onsite.	Materials and equipment appropriate for the type and quantity of potential spills shall be kept onsite and with any mobile activities as a spill cleanup kit. Keep cleanup materials in close proximity to locations where spills may occur, with instructions for use clearly displayed.	SC-11, SC-22
28	Drain fluids from inoperable vehicles and store or dispose of appropriately.	Oil, antifreeze, and other fluids shall be drained from inoperable vehicles intended for recycling or long-term storage that are stored outside. Drained fluids shall be disposed of in accordance with applicable hazardous materials regulations.	SC-22
29	Temporarily protect storm drains from non-storm water discharges at and downstream of the work area while conducting activities that have the potential to result in a discharge.	If activities conducted cannot be fully contained or minor failures in containment would potentially result in discharges of non-storm water to the MS4, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the MS4 shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs).	SC-10, SC-44

Table 1. Minimum Best Management Practices (BMPs) for Industrial, Commercial, and Municipal Sites/Sources (continued)

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
Waste Management			
30	Keep trash/waste storage areas free of exposed trash, sediment, and debris.	Stored waste shall be protected from contact with storm water and non-storm water run-on and run-off. Disposal areas for trash and other wastes (e.g., waste cooking oil) shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. Dry cleaning methods such as sweeping, scraping off residue, using dry mop, or rags are preferred. If wet cleaning methods are used, all wash water must be contained, captured, and disposed of appropriately. See BMP 4 for information on appropriate wet cleaning practices.	SC-34, SC-41
31	Protect waste storage areas from contact with storm water and non-storm water flows onto the property.	Stored trash and other wastes shall be completely protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes.	SC-34
32	Properly store and dispose of green waste.	Green waste shall be properly removed, stored, and disposed of such that it will not be transported to the MS4 by storm water or non-storm water runoff, wind, or other means.	SC-34, BG-40
33	Manage animal waste and animal washing in a manner that prevents transport of wastes and wash water off-site.	Animals and animal waste shall be managed and stored in a manner that prevents animal waste and wash water from entering the MS4. Collect and dispose of animal waste to the trash or the sanitary sewer, as appropriate.	SC-34, BG-10

3.2 Residential

Table 2 below presents the minimum required BMPs for residential sites and sources. The City's BMP standards are based on the CASQA BMP factsheets. City exceptions to the procedures described in the factsheets are identified in footnotes. Where any conflict may exist between CASQA factsheets and requirements in the Manual or the Municipal Code, the requirements of the Manual and the Municipal Code shall prevail. Complying with the BMPs described in the Manual does not ensure compliance with all other regulatory requirements, including requirements of other agencies. See Section 2 for more information about other potentially applicable requirements.

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Table 2. Minimum Best Management Practices (BMPs) for Residential Sites/Sources[5]

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
Discharge Control			
1	Eliminate illicit connections to the MS4.	Illicit connections are man-made physical connections to the municipal separate storm sewer system (MS4) that convey an illicit discharge. Find and abate all illicit connections to the MS4 through properly approved procedures, permits, and protocols.	SC-10, SC-44
2	Eliminate illicit non-storm water discharges.	Non-storm water (water other than rain) shall not be discharged to the City of Santee's (City) MS4. To eliminate illicit discharges, do not allow any solid or liquid material except uncontaminated storm water to enter City storm drains, curb gutters along city streets, or any other part of the City MS4.	SC-10, SC-11, SC-44
3	Properly dispose of wash water.	All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces.	SC-10, SC-41[6]

[5] To the extent practicable, the City's established minimum BMPs for industrial, commercial, municipal sites/sources shall also be implemented for any industrial/commercial type of activities conducted at a residence where appropriate.

[6] Factsheet SC-41 - Building & Grounds Maintenance, states (in regards to pressure washing), "If soaps or detergents are not used, and the surrounding area is paved, wash runoff does not have to be collected but must be screened. Pressure washers must use filter fabric or some other type of screen on the ground and/or in the catch basin to trap the particles in wash water runoff." Non-storm water discharges of this nature, even if filtered, are not allowed to enter the MS4. Wash water must be contained, collected, and disposed of properly.

Table 2. Minimum Best Management Practices (BMPs) for Residential Sites/Sources (continued)

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
4	Properly dispose of vehicle and equipment wash water.	Water associated with washing activities are not allowed to enter City storm drains, curbs and gutters, or any other part of the City's MS4. When washing vehicles, boats or other equipment in an area that may reach the MS4, the following BMPs must be employed. • Use of a control nozzle or similar mechanism is required to minimize the quantity of water used. • Wash areas should not be located near any drains that connect to the MS4. Designated washing areas may consist of a container, a berm, or a liner to collect and contain liquids and prevent runoff. • When washing is conducted all wash water must be contained, captured, and disposed of appropriately. Allowing contained water to evaporate is an acceptable method of disposal only if, after the water has evaporated, any remaining residue on pavement or other impervious areas is removed and properly disposed to prevent future pollutant discharges. Captured wash water may be disposed through the sanitary sewer system. • Wash water containing oil, paint, or other hazardous waste shall be disposed of properly in accordance with applicable regulations. • If only biodegradable soaps and uncontaminated water are used, wash water may be directed to onsite landscaped or pervious area(s) to infiltrate into the ground or evaporate, without resulting in erosion or runoff to the MS4 or any adjacent property. This can be accomplished by washing the vehicle on a landscaped area or using a berm to direct wash water to a landscaped area.	SC-10, SC-21
5	Properly dispose of water from fire sprinkler maintenance activities.	Fire sprinkler system discharges are likely contain corrosion inhibitors, fire suppressants, antifreeze, corroded materials, and bacteria from stagnant water and therefore, shall be disposed through the sanitary sewer system, not the MS4. Fire sprinkler system discharges without corrosion inhibitors, fire suppressants, or antifreeze may be disposed through the sanitary sewer, if practicable. When not practicable to discharge to the sanitary sewer system due to the presence of prohibited contaminants, all discharged water shall be collected and disposed of by an appropriately certified party. When not practicable to discharge to the sanitary sewer system for reasons other than the presence of prohibited contaminants, the water may be discharged to a landscaped area, so long as it does not create erosion, or runoff from the landscaped area.	SC-10, SC-41

Table 2. Minimum Best Management Practices (BMPs) for Residential Sites/Sources (continued)

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
6	Eliminate irrigation runoff.	Irrigation runoff to the MS4 shall be eliminated through proper landscape maintenance and watering practices. All irrigation water and associated pollutants from nurseries, garden centers, and similar facilities shall be prevented from reaching City storm drains, curb gutters along City streets, or any other part of the City's MS4.	SC-10[7], SC-41
7	Eliminate air conditioning condensation discharges.	Air conditioning condensation discharges shall be controlled from reaching City storm drains, curb gutters along City streets, or any other part of the City's MS4 and are prohibited from entering the City's MS4. The following BMPs are recommended: 1. Evaluate AC system to ensure it is operating properly. There should not be constant runoff from the system. 2. Air conditioning condensation can be directed to the sanitary sewer where feasible. 3. Air conditioning condensation discharges can be directed to onsite landscaped or pervious area to infiltrate or evaporate, without resulting in erosion or runoff to the MS4 or any adjacent property. Directing discharges to landscaping immediately adjacent to a building foundation is not recommended.	SC-10, SC-42
8	Eliminate pumped groundwater, foundation, and footing drain discharges.	Pumped groundwater, including water from crawl space pumps is prohibited unless a separate National Pollutant Discharge Elimination System (NPDES) permit has been obtained to cover the discharge, or the California Regional Water Quality Control Board, San Diego Region (RWQCB) has determined in writing that no permit is needed. Discharges from foundation and footing drains that are at or below the groundwater table are also prohibited, unless covered by an NPDES permit, or the RWQCB has determined in writing that no permit is needed.	SC-10

[7] Factsheet SC-10 – Non-Storm Water Discharges states that "landscape irrigation drainage and landscape watering" may be discharged to the storm drain with conditions; however, in accordance with RWQCB Order No. R9-2013-0001 (Municipal Permit), no irrigation runoff may be discharged to the City's MS4.

Table 2. Minimum Best Management Practices (BMPs) for Residential Sites/Sources (continued)

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
9	Minimize rising groundwater, diverted stream flows, uncontaminated groundwater infiltration, springs, riparian habitat/wetland flows, potable water sources, and foundation/ footing drain discharges.	Discharges from rising groundwater, diverted stream flows, riparian habitat and wetlands, uncontaminated groundwater infiltration to the MS4, springs, and potable water sources are exempt unless they are identified as a source of pollutants to receiving waters by the City or the RWQCB.	SC-10
10	Direct runoff from pavement, rooftops, and other impervious surfaces to landscaped areas.	Runoff from pavement, rooftops, and other impervious surfaces shall be directed to landscaped or pervious area(s) to infiltrate or evaporate, where suitable areas exist onsite. Energy dissipation and erosion control measures shall be used to prevent erosion and sediment transport.	SC-10
11	Regularly clean and maintain BMPs, including LID installations, to ensure proper performance.	All BMPs require maintenance, including Low Impact Development (LID) and structural BMPs. At a minimum, BMPs must be inspected annually, and properly operated and maintained. All installed LID or structural BMPs shall be inspected at a minimum of once annually for proper function and maintained to confirm the BMP is serving the purpose for which it was intended.	SC-44

Table 2. Minimum Best Management Practices (BMPs) for Residential Sites/Sources (continued)

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
		Erosion and Sediment Control	
12	Protect unpaved areas, including landscaping, from erosion using vegetative or physical stabilization.	Exposed soils that are actively eroding or prone to erosion due to disturbance shall be protected from erosion. Significant accumulations of eroded soil shall be removed or contained to prevent sediment transport in runoff to the MS4.	SC-40, SC-42
		Good Housekeeping	
13	Regularly clean parking areas.	Paved parking lots, private roads, and driveways located on the property shall be cleaned as needed to prevent pollutants from entering the City's MS4, including the curb and gutter. Dry sweeping, or a street sweeper which vacuums up debris and water, are the preferred method of cleaning. Wet cleaning methods, such as mopping or power washing, may be substituted for sweeping if all wash water is contained, captured, and disposed of appropriately.	SC-41, SC-43
14	Implement good housekeeping to keep site free of trash and debris.	Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris.	SC-41
15	Keep storm drain inlets and under drains free of sediment, trash, and debris.	Accumulated materials shall be removed from on-site storm drains as needed to keep them free of trash, sediment, litter, and other debris.	SC-44
		Material Storage and Handling	
16	Reduce the amount of liquid cleaning agents and solvents used.	Reduce potential for pollution from cleaning agents such as soaps and detergents used in any maintenance operations. Use products other than liquid cleaning agents to the maximum extent practicable. Substitute non-toxic or less-toxic cleaning agents.	SC-22

Table 2. Minimum Best Management Practices (BMPs) for Residential Sites/Sources (continued)

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
		Pesticide and Fertilizer Management	
17	Properly manage pesticides and fertilizers.	Pesticides and fertilizers shall be applied in strict accordance with manufacturer's label, as authorized by U.S. Environmental Protection Agency. Chemicals shall be stored safely in covered and contained areas. Waste products shall be disposed of in accordance with the manufacturer's label and applicable hazardous waste regulations. The use of integrated pest management (IPM) principles is encouraged to reduce or eliminate use of chemicals. For more information about integrated pest management, see the University of California Statewide IPM Program at http://www.ipm.ucdavis.edu.	SC-35, SC-41
		Spill Prevention and Response	
18	Prevent or capture liquid leaks from vehicles or equipment.	Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles while stored and during any maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations.	SC-11, SC-22
19	Immediately clean up spills.	Spills shall be cleaned up immediately and prevented from entering the MS4. Dry cleaning methods such as the use of rags and absorbents are preferred cleaning methods. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the City's Storm Water Hotline at (619) 258-4100 (x168).	SC-11
20	Drain fluids from inoperable vehicles and store or dispose of appropriately.	Oil, antifreeze, and other fluids shall be drained from inoperable vehicles intended for recycling or long-term storage that are stored outside. Drained fluids shall be disposed of in accordance with applicable hazardous materials regulations.	SC-22
21	Temporarily protect storm drains from non-storm water discharges while conducting any activities that has the potential to runoff.	If activities conducted cannot be fully contained or minor failures in containment would potentially result in discharges of non-storm water to the MS4, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the MS4 shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs).	SC-10, SC-44

Table 2. Minimum Best Management Practices (BMPs) for Residential Sites/Sources (continued)

No.	BMP Title	BMP Description	CASQA BMP Factsheet Reference
		Waste Management	
22	Keep trash/waste storage areas free of exposed trash, sediment, and debris.	Stored waste shall be protected from contact (both run-on and run-off) with storm water and non-storm water. Disposal areas for trash and other wastes shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, liquid residue, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. Dry cleaning methods such as sweeping are preferred. If wet cleaning methods are used, all wash water must be contained, captured, and disposed of appropriately. See BMP 3 for information on appropriate wet cleaning practices.	SC-34, SC-41
23	Protect waste storage areas from contact with storm water and non-storm water flows on to the property.	Stored trash and other wastes shall be protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes.	SC-34
24	Properly store and dispose of green waste.	Green waste shall be properly stored and disposed of such that it will not be transported to the MS4 by storm water or non-storm water runoff. Contact Waste Management to request a free recycling bin.	SC-34
25	Manage animal waste and animal washing in a manner that prevents transport of wastes and wash water off-site.	Animals and animal waste shall be managed and stored in a manner that prevents animal waste and wash water from entering the MS4. Collect and dispose of animal waste to the trash or the sanitary sewer, as appropriate.	SC-34

3.3 Construction

Table 3 presents the minimum BMPs required for construction sites within the City's jurisdiction. The City's BMP standards are based on the CASQA BMP factsheets. Where any conflict may exist between CASQA factsheets and requirements in the Manual or the Municipal Code, the requirements of the Manual and the Municipal Code shall prevail. Complying with the BMPs described in the Manual does not ensure compliance with all other regulatory requirements, including requirements of other agencies. See Section 2 for more information about other potentially applicable requirements.

Construction site BMPs are required to be implemented in an effective combination of BMPs that are site specific, construction phase appropriate, and seasonally appropriate. Dry season (May 1 through September 30) BMP implementation must plan for and address rain events that may occur in the dry season. BMP implementation for ground disturbing activities should include an effective combination of both erosion and sediment control BMPs. The City emphasizes erosion control BMPs as the primary approach to reducing pollution in storm water discharges from construction sites.

Because site conditions change over time and from phase to phase, site owners and operators should regularly evaluate BMP implementation to verify continued effectiveness. City staff also assess BMP implementation during construction, most commonly during site inspections. City staff have the authority to require BMPs that are appropriate to the observed condition and phase of a construction site to ensure discharges of pollutants are reduced to the MEP, even if those BMPs are not explicitly shown on the approved plans.

Construction sites also must adhere to the requirements of all applicable additional SWRCB or RWQCB general or site-specific NPDES permits for construction activities (see Section 2) at the time of construction.

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Table 3. Minimum Best Management Practices (BMPs) for Construction Sites

BMP Categories	Required, Where Applicable[1]	CASQA BMP Factsheet No.	CASQA BMP Factsheet Name	Municipal Permit BMP Categories							CASQA BMP Objectives					
				Project Planning	Erosion Control	Run-on & Runoff Control	Sediment Control	House-keeping	Non-Storm Water Management	Active/ Passive Sediment Treatment	Erosion Control	Sediment Control	Tracking Control	Wind Erosion	Non-Storm Water Management	Waste Management
Project Planning	Yes	EC-1	Scheduling	x							P	S	S	S		
Erosion Control	Yes, Select Effective Combination[2,]	EC-2	Preservation of Existing Vegetation	x	x						P					
		EC-3	Hydraulic Mulch		x						P			S		
		EC-4	Hydroseeding		x						P			S		
		EC-5	Soil Binders		x						P			S		
		EC-6	Straw Mulch		x						P			S		
		EC-7	Geotextiles and Mats		x						P			S		
		EC-8	Wood Mulching		x						P			S		
		EC-14	Compost Blankets		x						P					
	Yes, Select Effective Combination[2]	EC-9	Earth Dikes and Drainage Swales			x					P					
		EC-10	Velocity Dissipation Devices			x					P					
		EC-11	Slope Drains			x					P					
	Yes	EC-12	Stream Bank Stabilization		x						P	S			S	
	Potential Alternative[3]	EC-15	Soil Preparation Roughening		x						P	S				
		EC-16	Non-Vegetative Stabilization		x						P	S			S	

Table 3. Minimum Best Management Practices (BMPs) for Construction Sites (continued)

BMP Categories	Required, Where Applicable[1]	CASQA BMP Factsheet No.	CASQA BMP Factsheet Name	Municipal Permit BMP Categories							CASQA BMP Objectives					
				Project Planning	Erosion Control	Run-on & Runoff Control	Sediment Control	House-keeping	Non-Storm Water Management	Active/ Passive Sediment Treatment	Erosion Control	Sediment Control	Tracking Control	Wind Erosion	Non-Storm Water Management	Waste Management
Sediment Control	Yes, Select Effective Combination[2, 4]	SE-1	Silt Fence[5]				x					P				
		SE-2	Sediment Basin[6]				x					P				
		SE-3	Sediment Traps[6]				x					P				
		SE-4	Check Dam				x				S	P				
		SE-5	Fiber Rolls[5]				x				S	P				
		SE-6	Gravel Bag Berm				x				S	P				
	Yes	SE-7	Street Sweeping and Vacuuming				x	x				S	P			
	Yes	TC-1	Stabilized Construction Entrance/Exit				x				S	S	P			
	At Discretion of City[7]	TC-2	Stabilized Construction Roadway				x				S	S	P			
	At Discretion of City[7]	TC-3	Tire Wash				x					S	P			
	Yes	SE-10	Storm Drain Inlet Protection				x					P				
	Potential Alternative[8]	SE-12	Manufactured Linear Sediment Controls				x				S	P				P
		SE-13	Compost Socks and Berms				x				S	P				
		SE-14	Biofilter Bags				x					P				
	At Discretion of City[7]	WE-1	Wind Erosion Control				x					S		P		
	At Discretion of City[7, 9]	SE-11	Active Treatment Systems[10]							x	P					

Table 3. Minimum Best Management Practices (BMPs) for Construction Sites (continued)

BMP Categories	Required, Where Applicable[1]	CASQA BMP Factsheet No.	CASQA BMP Factsheet Name	Municipal Permit BMP Categories							CASQA BMP Objectives					
				Project Planning	Erosion Control	Run-on & Runoff Control	Sediment Control	House-keeping	Non-Storm Water Management	Active/ Passive Sediment Treatment	Erosion Control	Sediment Control	Tracking Control	Wind Erosion	Non-Storm Water Management	Waste Management
Waste Management and Good Housekeeping	Yes	NS-1	Water Conservation Practices						x		S	S			P	
	Yes	NS-2	Dewatering Operations						x			S			P	
	Yes	NS-3	Paving and Grinding Operations						x						P	S
	Yes	NS-4	Temporary Stream Crossing						x		S	S	S		P	
	Yes	NS-5	Clear Water Diversion						x						P	
	Yes	NS-6	Illicit Connection/Discharge						x						P	
	Yes	NS-7	Potable Water/Irrigation[10]						x						P	
	Yes	NS-8	Vehicle and Equipment Cleaning					x	x						P	
	Yes	NS-9	Vehicle and Equipment Fueling					x	x						P	
	Yes	NS-10	Vehicle and Equipment Maintenance					x	x						P	
	Yes	NS-11	Pile Driving Operations						x						P	
	Yes	NS-12	Concrete Curing						x						P	P
	Yes	NS-13	Concrete Finishing						x						P	P
	Yes	NS-14	Material Over Water						x						P	P
	Yes	NS-15	Demolition Adjacent to Water						x							P
	Yes	NS-16	Temporary Batch Plants						x							P
	Yes	WM-1	Material Delivery & Storage					x								P
	Yes	WM-2	Material Use					x								P
	Yes	WM-3	Stockpile Management					x			S	S				P
	Yes	WM-4	Spill Prevention & Control					x								P
	Yes	WM-5	Solid Waste Management					x								P

Table 3. Minimum Best Management Practices (BMPs) for Construction Sites (continued)

BMP Categories	Required, Where Applicable[1]	CASQA BMP Factsheet No.	CASQA BMP Factsheet Name	Municipal Permit BMP Categories							CASQA BMP Objectives					
				Project Planning	Erosion Control	Run-on & Runoff Control	Sediment Control	House-keeping	Non-Storm Water Management	Active/ Passive Sediment Treatment	Erosion Control	Sediment Control	Tracking Control	Wind Erosion	Non-Storm Water Management	Waste Management
Waste Management and Good Housekeeping (Continued)	Yes	WM-6	Hazardous Waste Management					x								P
	Yes	WM-7	Contaminated Soil Management					x								P
	Yes	WM-8	Concrete Waste Management					x	x						S	P
	Yes	WM-9	Sanitary/ Septic Waste Management					x	x							P
	Yes	WM-10	Liquid Waste Management					x	x							P

Notes

CASQA BMP Objectives: P – Primary, S - Secondary

1. BMPs marked as required do not need to be included in plans or implemented if demonstrated not to be applicable satisfactory to City staff.
2. A combination of the BMPs within these categories that will be effective, as determined by City staff, shall be proposed. Typically not all BMPs within the category will be necessary to provide an effective combination. In some cases only one BMP from the category may be necessary to be effective.
3. These BMPs may be included as part of the overall effective combination of erosion control BMPs if approved by City staff.
4. An effective combination of sediment control BMPs includes both full perimeter protection and sediment control within the boundaries of the site.
5. Silt fence and fiber rolls shall be staked into the ground as shown in the CASQA factsheet to be effective. Therefore, unless otherwise approved by City staff, they may not be used in paved areas or other areas where staking is not possible; gravel bags (SE-6) or compost socks (SE-13) shall be used instead.
6. Sediment basins and traps shall be sized per CASQA and City standards. Sediment basins and traps shall be maintained after storms in accordance with the CASQA factsheets unless otherwise directed by City staff. Due to site drainage patterns, sediment basins and traps are often located where permanent post-construction BMPs will eventually be installed. All accumulated sediment from the construction phase shall be removed prior to final installation of permanent post-construction BMPs to maintain the as-designed percolation rate.
7. These BMPs are not required to be included in plans or implemented unless specifically directed to be included by City staff to meet the MEP standard.
8. These BMPs may be included as part of the overall effective combination of sediment control BMPs if approved by City staff.
9. Active treatment systems are required for CGP Risk Level 3 sites. They may also be required for other sites at the discretion of City staff.
10. The CASQA factsheet implies some irrigation runoff may be acceptable. However, irrigation runoff discharges are considered illegal discharges and are prohibited per the City's Municipal Code.

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3.4 Development Projects

The City's BMP requirements for new and re-development projects are presented in the City's Standard Urban Stormwater Mitigation Plan, which is available on the City's website (www.ci.santee.ca.us). These BMPs include, but are not limited to, site design, source control, and post-construction structural BMPs (e.g., flow control or treatment control devices).

3.4.1 Notice of Upcoming Changes to Requirements

By 2016, the City anticipates adopting updated BMP requirements for new and re-development projects that will be consistent with the Municipal Permit adopted in 2013. The updated requirements and associated guidance document (referred to as the "BMP Design Manual" in the Municipal Permit) are being prepared cooperatively with staff from multiple San Diego County municipalities and other interested parties. The City will be publishing notices and informing the development community of these new requirements as they near coming into effect. Project proponents that anticipate acquiring City approvals for construction toward the end of 2015, or initiating construction near then, are advised to contact the City's Development Services Department's Engineering & Traffic Services Division at (619) 258-4100 (x186) to evaluate applicability of the new requirements.

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907.12

Legend

City Boundary

SW Structures

Type

- Inlet
- Clean Out
- Headwalls

SW Channels

Type

- Pipe
- Box Culvert
- Concrete Channel
- Concrete Ditch
- Earthen Channel
- 907.12
- 907.13
- Outfalls*

N

CARLTON HILLS
MAST
CUYAMACA
MAGNOLIA
WOODSIDE
MISSION GORGE
PROSPECT
SAN DIEGO RIVER
FORESTER CREEK
LOS COCHES

907.13

*The status of major outfalls marked as having persistent flow, and the subset of those outfalls selected for additional analytical monitoring, will change in the future as the City collects more data from outfall monitoring and as sources of flow are eliminated. More details about the additional analytical monitoring, including which outfalls have been selected for monitoring, is included in the San Diego River WQIP. Updates will be provided through the WQIP annual reporting process.

Retrofit and Rehabilitation Projects

1 Introduction

The Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001 (Municipal Permit or Permit) requires the 18 municipalities in San Diego County, the County of San Diego, the San Diego County Regional Airport Authority, and the San Diego Unified Port District, including the City of Santee (City) to develop a program that will retrofit areas of existing development and a program to rehabilitate streams, channels, and/or habitats within the City's jurisdiction. Addressing the highest priority water quality conditions (HPWQCs) for each Watershed Management Area (WMA), as established by the Water Quality Improvement Plans (WQIPs), is a key goal of this program. The City's retrofit and rehabilitation program may be modified through an adaptive management process over the course of the Permit term.

- In the San Diego River WMA, the City will focus its program on addressing bacteria

The following sections discuss the strategies the City will utilize to identify, prioritize, and implement potential projects that will address the HPWQCs listed above.

2 Program Organization

The City does not maintain one overarching retrofit and rehabilitation program. Rather, the City has several different programs that contribute to retrofits or stream, channel, and/or habitat rehabilitation efforts within areas of existing development, as summarized below:

- Alternative compliance provisions for development projects, which allow offsite retrofit or rehabilitation projects in lieu of meeting the relevant storm water requirements solely through onsite practices. Because this effort is currently under development, the processes for approving, implementing, maintaining, and reporting on such projects and the associated responsible departments will be identified in the future.
- Obtaining grants for storm water improvements.
- Implementing projects, typically green infrastructure or other structural water quality improvement BMPs, as part of the City's efforts to comply with applicable Total Maximum Daily Load (TMDL) requirements.

3 Candidate Projects

The Municipal Permit requires the City to identify candidate retrofit and stream rehabilitation projects. When resources to complete a retrofit or stream restoration project become available,

the list of candidate projects is a useful resource. Retrofit or rehabilitation projects that are not on the candidate project list may also be implemented; the presence of the candidate project list does not preclude projects that are not included on the list from being pursued.

Some candidate projects have been identified through the Watershed Management Area Analysis (WMAA) conducted in 2014 for San Diego River WMA as part of the development of WQIPs. The Permit provides Copermittees with an option to perform a WMAA in order to assist in the development of requirements for structural BMP implementation for PDPs in each WMA.

The WMAA included analysis and development of GIS maps through the collection of information pertaining to the physical characteristics of the WMA such as present and anticipated future land uses and locations of physical structures within streams and upland areas that affect the watershed hydrology (such as bridges, culverts, and flood management basins).

This initial candidate project list incorporates projects identified in the City's jurisdiction through the regional Watershed Management Area Analysis (WMAA) and in previous planning efforts, including its Comprehensive Load Reduction Plan documents, which were prepared in response to TMDLs. The purpose of the candidate project list is to identify potential projects. Most candidate projects have been identified only at a basic conceptual stage, and more detailed investigation may find that they are not feasible. Implementation of projects on the candidate project list is also contingent upon funding availability. Beyond these efforts, the City is also soliciting additional project recommendations from the public.

Projects may be added to or removed from the candidate project list as additional data becomes available in the future. Factors considered when identifying projects to be included as candidate projects are summarized in sections 3.1 (retrofits) and 3.2 (stream, channel, and/or habitat rehabilitation) below.

3.1 Identifying Retrofit Candidate Projects

As defined by the Municipal Permit, a retrofit is a "storm water management practice put into place after development has occurred in watersheds where the practices previously did not exist or are ineffective." Potential projects can include, for example, disconnecting roof downspouts and impervious surfaces and redirecting them to pervious areas, installing rain barrels, or implementing green streets. The following factors are considered when identifying candidate projects.

- **Directly targets the City's HPWQCs and helps make progress toward WQIP numeric goals.**

- **Feasibility of project.** The feasibility of the project is an important consideration that takes into account a project's likelihood of obtaining funding, constructability, ease of implementation and operation, and any potential impediments. The project's viability takes into account the amount of resources City staff are able to commit to the project. Candidates that may place a considerable administrative burden on City staff, or that may require significant City resources to maintain and operate are generally less desirable projects and may be entirely infeasible.
- **Total area of high threat to water quality (TTWQ) properties.** The total area of inventoried existing development (industrial, commercial, municipal, and residential) classified as having a high TTWQ draining to a candidate project will be considered. The facility's or area's TTWQ is based on the prioritization processes discussed in sections 6, 7, and 9 of the Jurisdictional Runoff Management Program (JRMP) document which takes into account the facility's or area's pollutant discharge potential and proximity to and sensitivity of the water body in which the area drains to.
- **Land use.** Land use of the area tributary to a potential retrofit project is an important consideration when selecting retrofit project candidates. Land uses commonly associated with the HPWQCs described above will be considered before other land uses. Commonly, agricultural areas and commercial nurseries are seen as likely sources of nutrients, since fertilizers are typically used during routine operations.
- **Multiple benefits of project.** Candidate projects with the potential to contribute to the overall enhancement of the local environment are preferred. Other benefits of retrofit projects can include, but are not limited to, the following:
    - Enhanced walkability or pedestrian safety and access
    - Community beautification, such as streetscape aesthetics or incorporating murals other features with significant artistic value.
    - Improved flood protection
    - Improved access to green spaces or recreational opportunities
    - Environmental justice
- **Land availability.** If there is development bordering a potential stream segment on both sides of the stream, it would be difficult to complete a retrofit project. Similarly, land ownership is another factor to consider when identifying areas for potential projects. If the City owns the property where a project is being considered, that is the best case scenario. If another public agency, like a school district, owns the property, then that is

second best, whereas, if the land is privately owned, especially if there are many land owners, the project could become more complicated to execute.

- **Amount of impervious area.** Projects that have the potential to treat a large area of impervious surfaces are ideal project candidates. Impervious surfaces are generally recognized as sources of common storm water pollutants such as oil and grease, heavy metals, and sediment (CASQA, 2003).
- **Cost effectiveness.** Projects that are able to remove the greatest unit of pollution for the lowest cost are preferred. Long term best management practice (BMP) maintenance cost will also be considered.
- **Opportunities for infiltration or retention.** Ideal candidates will incorporate structural BMPs suitable for infiltration or retention. The project's suitability is primarily determined by the soil type for the proposed project area, but also by depth to groundwater and proximity to neighboring buildings and infrastructure. Infiltration is the most effective BMP, since it has close to 100 percent pollutant removal efficiency and also reduces runoff volume, and requires relatively low maintenance (CASQA, 2003). Since there are few areas within San Diego County where infiltration is feasible, if a project is able to incorporate infiltration BMPs, it should be considered.

The City of Santee is identified as a responsible party of the Comprehensive Load Reduction Plan (CLRP) for the San Luis Rey River Watershed which was prepared in response to the watershed's bacteria Total Maximum Daily Load (TMDL). During the preparation of the CLRP, efforts were made by the City and the other responsible parties to identify higher priority storm drain catchments for retrofit, and in some cases specific locations for potential structure BMPs were identified. Catchments were prioritized in order to identify catchments within the watershed that have potential to generate the greatest pollutant load during a rain event. Candidates for potential structural BMP implementation were identified within high priority catchments based on factors such as parcel size, land ownership, and proximity to storm drains. Additional information on the catchment identification and prioritization process and the list of structural BMP candidate projects can be found in the *CLRP for the San Luis Rey River Watershed* (Geosyntec, 2012).

3.2 Identifying Stream, Channel, and/or Habitat Rehabilitation Candidate Projects

The Municipal Permit states that rehabilitation methods may include in-stream restoration, off-line storm water management practices installed in the system corridor or upland areas, or a combination of in-stream and out-of-stream techniques. Some of these techniques may include

riparian zone restoration, constructed wetlands, channel modifications, and daylighting of drainage systems. The following factors are considered when identifying candidate projects.

- **Directly targets the City's HPWQCs and helps make progress toward WQIP numeric goals.**
- **Feasibility of project.** The feasibility of the project is an important consideration that takes into account a project's likelihood of obtaining funding, constructability, ease of implementation and operation, and any potential impediments. The project's viability takes into account the amount of resources City staff are able to commit to the project. Candidates that may place a considerable administrative burden on City staff, or that may require significant City resources to maintain and operate are generally less desirable projects and may be entirely infeasible.
- **Multiple benefits of project.** Candidate projects with the potential to contribute to the overall enhancement of the local environment are preferred. Other benefits of rehabilitation projects can include, but are not limited to, the following:
    - Enhanced walkability or pedestrian safety and access
    - Community beautification, such as streetscape aesthetics or incorporating murals other features with significant artistic value
    - Improved flood protection
    - Improved access to green spaces or recreational opportunities
    - Environmental justice
- **Beneficial uses.** Stream segments with the following beneficial uses should be considered for rehabilitation before others. All beneficial use abbreviations and definitions are taken from the *Water Quality Control Plan for the San Diego Basin* (RWQCB 1994).
    - Biological Habitats of Special Significance (BIOL) – Includes uses of water that support designated areas or habitats, such as established refuges, parks, sanctuaries, ecological reserves, or Areas of Special Biological Significance), where the preservation or enhancement of natural resources requires special protection.
    - Cold Freshwater Habitat (COLD) – Includes uses of water that support cold water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish or wildlife, including invertebrates.

- Estuarine Habitat (EST) – Includes uses of water that support estuarine ecosystems including, but not limited to, preservation or enhancement of estuarine habitats, vegetation, fish, shellfish, or wildlife (e.g., estuarine mammals, waterfowl, shorebirds).
- Freshwater Replenishment (FRSH) – Includes uses of water for natural or artificial maintenance of surface water quantity or quality (e.g., salinity).
- Rare, Threatened or Endangered Species (RARE) – Includes uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened, or endangered.
- Inland Saline Water Habitat (SAL) – Includes uses of water that support inland saline water ecosystems including, but not limited to, preservation or enhancement of aquatic saline habitats, vegetation, fish or wildlife, including invertebrates.
- Spawning, Reproduction, and/or Early Development (SPWN) – Includes uses of water that support high quality habitats suitable for reproduction, early development, and sustenance of marine fish and/or cold freshwater fish.
- Warm Freshwater Habitat (WARM) – Includes uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish or wildlife, including invertebrates.

Stream or channel segments with multiple beneficial uses are desirable candidates.

- **Land availability.** If there is development bordering a potential stream segment on both sides of the stream, it would be difficult to complete a restoration project. Similarly, land ownership is another factor to consider when identifying candidate projects. If the City owns the property where a project is being considered, that is the best case scenario. If another public agency, like a school district, owns the property, then that is second best. Whereas, if the land is privately owned, especially if there are many land owners, the project could become more complicated to execute.
- **Amount of impervious area.** Projects that have the potential to treat a large area of impervious surfaces are ideal project candidates. Impervious surfaces are generally recognized as sources of common storm water pollutants such as oil and grease, heavy metals, and sediment (CASQA, 2003).

This summarizes the strategies the City will employ to facilitate the implementation or construction of retrofit and rehabilitation projects in accordance with the WQIPs. The City may

also consider partnering with other neighboring jurisdictions to install regional BMPs where retrofit projects are deemed to provide a greater net benefit to the City than projects implemented only by the City.

References

California Regional Water Quality Control Board, San Diego Region, 2013. Order No. R9-2013-0001. *Waste Discharge Requirements for Discharges of Urban Runoff from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds of the County of San Diego, the Incorporated Cities of San Diego County, the San Diego Unified Port District, and the San Diego County Regional Airport Authority.*

California Storm Water Quality Association, 2003. *California Storm Water BMP Handbook – New Development &Redevelopment.*

Geosyntec, 2012. *Comprehensive Load Reduction Plan for the San Luis Rey River Watershed.*

Dry Weather Major MS4 Outfall Discharge Monitoring Procedures

1 Introduction

In accordance with the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001 (Municipal Permit), the City Santee (City), along with other Copermittees, is required to monitor discharges from its major municipal separate storm sewer system (MS4) outfalls during dry weather. Weather is considered dry if the preceding 72 hours has been without measurable precipitation (> 0.1 inch).

The Municipal Permit defines a major MS4 outfall as a single pipe with an inside diameter of at least 36 inches or its equivalent (i.e., discharge from a single conveyance other than a circular pipe which is associated with a drainage area of more than 50 acres); or, as any outfall that discharges from a single pipe with an inside diameter of at least 12 inches or its equivalent (i.e., discharge from other than a circular pipe associated with a drainage area of at least 2 acres) that receives runoff from an area zoned for industrial activity (based on comprehensive zoning plans or equivalent).

This procedural document describes field protocols for conducting routine dry weather MS4 outfall monitoring and for investigations to identify sources of water observed during monitoring.

2 Major MS4 Outfall Inventory

The City has identified the major outfalls within its jurisdiction and maintains an inventory of them as required by the Municipal Permit. In cases where a major outfall is permanently inaccessible (e.g., due to private property constraints, safety concerns, etc.), the nearest accessible upstream location within the MS4 is designated as a proxy for the monitoring site. The major MS4 outfall inventory includes the following information for each monitoring location:

- Latitude and longitude of major MS4 outfall (or the upstream proxy site)
- Watershed Management Area (WMA)
- Hydrologic subarea (HSA)
- Outfall size (inches)
- Accessibility (i.e. safety and without disturbance of critical habitat)
- Approximate drainage area (acres)
- Classification of whether the outfall is known to have persistent, transient, or no dry weather discharges. Persistent flow is defined in the Municipal Permit as the presence of flowing, pooled, or ponded water more than 72 hours after a measureable rainfall

event of 0.1 inch or greater during three consecutive monitoring and/or inspection events. All other flowing, pooled, or ponded water is considered transient.

3 Routine Dry Weather Major MS4 Outfall Site Visits

During each site visit, a field datasheet (Attachment 1) is completed. The steps involved in obtaining the information to complete the datasheet are listed in the following sections.

3.1 Site Location and Documentation

The first task in conducting a routine site visit is locating the site. This is achieved by using GPS coordinates and the location description provided by the major outfall monitoring site inventory. A hand-held GPS device is used in the field to verify or update coordinates. Once the site has been located and verified, photos are taken to document the condition of the site. Photos are taken facing upstream and downstream of the site and are taken such that they sufficiently display any water present and notable landmarks when possible.

3.2 Atmospheric Conditions

Weather conditions and rainfall information are recorded on the field datasheet. It is important to record the nature of the tide (i.e., incoming, outgoing, high) and its height if the outfall may be tidally influenced. Since monitoring is only permitted to be conducted during dry weather, it is important to document that the monitoring is being completed during dry weather conditions: >72 hours since the last rain, or <72 hours since the last ran and ≤0.1 inches of precipitation. If neither of those conditions are met, then dry weather monitoring cannot be conducted. The field team should then stop work until dry weather conditions apply again.

3.3 Flow Measurements

At each site, the outfall is assessed for the presence of water. If a site has flowing or ponded water, sampling staff will observe whether the flow reaches the receiving water body. If the sampling site is upstream of the outfall due to accessibility constraints, it is usually not possible to visually observe whether the flow reaches the receiving water body. In these cases, the "Unknown" option is selected on the datasheet.

At sites with flowing water, the flow rate is also measured and recorded on the field datasheet in gallons per minute (gpm). If the site location is within a manhole, width, depth and velocity measurements cannot be precisely determined and the flow rate must be estimated. If an outfall has ponded water, the flow is recorded as zero gpm. If an outfall is dry, the flow rate is recorded as "Dry".

There are several methods that can be used to measure the rate of flow, but the most commonly used is the velocity-area ("leaf float") method. This is done by using a stop watch or equivalent to measure the time it takes for a leaf or similar object to float across a pre-measured distance of

flowing water. The flow rate can then be calculated by using width, depth, and velocity measurements.

The three methods used to measure flow rate and a description of each are included below:

Velocity-area method ("leaf float") - The most common method for measuring the discharge of a channel is the velocity-area method. This method requires the physical measurement of the cross-sectional area and the velocity of the flowing water. Discharge is determined as the product of the area times the velocity:

Flow rate (ft^3/sec, or cfs) = Velocity (ft/sec) x Depth (ft) x Width (ft)

The leaf float method involves using a stop watch to measure the time (in seconds) it takes for a leaf or similar object to float across a pre-measured distance (in feet) of the surface of the flowing water. The flow rate can then be calculated by using the equation above. A correction factor between 0.5 and 0.8 should be applied to the flow rate calculation while in the field, based on the width and depth of the flow, as well as the roughness of the conveyance surface material. In general, the rougher the conveyance surface material, the lower the correction factor that must be applied to the flow rate.

Filling a bottle or known volume method - The rate can be determined by measuring the diameter of the outfall and the length of time it takes to fill a 1 liter bottle or any other container with a known volume. Dividing the volume by the time gives a flow rate. Appropriate conversion factors are then applied to convert that flow rate to gpm or cfs if needed. For example, 1 liter per second is equal to 15.85 gpm.

Partially filled pipe method - This method is applicable to discharges from circular pipes. All measurements should be converted to ft before calculation so that the final flow rate is given in cfs.

The water depth and inside pipe diameter are measured, then the following approach is applied using the partially filled pipe formula chart in Table 1.

- Calculate D/d
  - D = water depth (ft) and d = inside pipe diameter (ft)
- Find the tabulated (Ta) value on the partially filled pipe formula chart below using the D/d value (e.g., If D/d = 0.26 then Ta =0.1623)
- Find the area using the formula $a = Ta*d^2$
- Calculate flow: Q (flow, cfs) = a (ft^2) x Velocity (ft/sec)

If desired, convert to gpm as follows: 1 cfs = 448.8 gpm

Table 1. Calculating the Area (a) of the Cross Section of a Circular Pipe Flowing Partially Full

D/d	0.00	0.01	0.02	0.03	0.04	0.05	0.06	0.07	0.08	0.09
0.0	0.0000	0.0013	0.0037	0.0069	0.0105	0.0147	0.0192	0.0242	0.0294	0.0350
0.1	0.0409	0.0470	0.0534	0.0600	0.0668	0.0739	0.0817	0.0885	0.0951	0.1039
0.2	0.1118	0.1199	0.1281	0.1365	0.1440	0.1535	0.1623	0.1711	0.1800	0.1890
0.3	0.1982	0.2074	0.2187	0.2280	0.2355	0.2450	0.2540	0.2642	0.2780	0.2836
0.4	0.2934	0.3032	0.3130	0.3220	0.3328	0.3428	0.3527	0.3627	0.3727	0.3827
0.5	0.3980	0.4030	0.4130	0.4230	0.4330	0.4430	0.4520	0.4620	0.4720	0.4820
0.6	0.4920	0.5020	0.5120	0.5210	0.5310	0.5400	0.5500	0.5590	0.5690	0.5780
0.7	0.5870	0.5960	0.6050	0.6140	0.6230	0.6320	0.6400	0.6490	0.6570	0.6660
0.8	0.6740	0.6810	0.6890	0.6970	0.7040	0.7120	0.7190	0.7250	0.7320	0.7360
0.9	0.7450	0.7500	0.7560	0.7610	0.7660	0.7710	0.7750	0.7790	0.7820	0.7840

D = Depth of water a = area of water in partially filled pipe
d = diameter of the pipe Ta = Tabulated Value Then $a = Ta*d^2$

Source: County of San Diego, May 2011. *Dry Weather and MS4 Analytical and Field Screening Monitoring Procedures Manual*

3.4 Observations

Observations for odor, color, clarity, and floatables are assessed and recorded on a field datasheet. When the site is dry, the option "na (dry)" is marked, meaning "not analyzed" and/or "dry site".

Odor: Choose any of the following options that is most representative of the site conditions: none, sewage, sulfides, petroleum, manure, other. Note that "sulfides" indicates the distinct rotten egg smell associated with hydrogen sulfide gas. A petroleum odor usually refers to a smell of gasoline/diesel. Any time a sewage or petroleum odors are noted, some additional source investigation should be completed and/or the appropriate authorities (sewer agency or County of San Diego Department of Environmental Health) should be notified.

Color: Choose one of the following options most representative of the water when viewed *in situ*: none, yellow, brown (silty), white (milky), gray, other.

Clarity: If the water has minimal or no turbidity, mark "Clear." For more turbid water, the clarity options "Cloudy" and "Murky" are distinguished as follows:

- If the field team views the water at the site and can see more than 4" below the surface of the water, the clarity field is marked as "Cloudy (> 4" vis)." When visibility is limited to less than 4" below the surface of the water, it is marked as "Murky (<4" vis)."

Floatables: Select one or more of the following: none, trash, bubbles/foam, sheen, algae, biofilms, other. Only materials present on or very close to the surface of the water shall be included for this observation. For example, if trash is observed well below the water

surface or at a dry site, trash should not be marked as a floatable. However, trash would still be recorded in the trash assessment section in these cases.

Observations of deposits, vegetation, and biology noted at the site, and the structural condition of the outfall, are recorded for all sites, even if the site is dry.

Deposits: Select one or more of the following: none, coarse particulate, fine particulate, stains/minerals, oily deposit, other. Coarse particulates include particles such as sand or gravel and fine particulates include any particulates that are smaller than the coarse particulates, such as from the presence of clay sediment. Stains or oily deposits, if observed, may require upstream source investigations if they appear recent. Mineral deposits can result in orange/red deposits and oil deposits are black in color.

Vegetation: Sites within manholes will almost always have no vegetation, so "none" should be marked on the datasheet. If the vegetation is observed as less than what is typical for the site, due to excessive erosion or plant removal for instance, the site is considered to have "Limited" vegetation. Sites with vegetation that is overgrown and is impeding, or may impede, flow from the site, or that may contribute to other water quality issues, are considered to have "Excessive" vegetation. Sites observed with typical vegetation for the site are marked as "Normal".

Biology: Select all applicable options (more than one can be selected). Note that additional categories of organisms can also be notes by writing them in next to the "Other" option.

Structural Condition: "Damaged" means that the outfall structure is cracked, has partially collapsed, or is otherwise in need of repair. "Scour Pond" means an unpaved area just downstream of the outfall has been eroded by outfall discharges such that a depression that allows water to collect and pond has formed. Scour ponds may be sources of bacteria. "Erosion" means there is evidence of erosion at or downstream of an outfall that could either result in a blockage or to water quality issues. "Blockage" means the flow path through the outfall is significantly obstructed. Outfalls to which none of the above apply and that are in good structural condition are marked as "Normal".

3.5 Trash Assessments

Trash assessments are performed for a designated area around each outfall visited for field screening. The area of assessment is determined using the best professional judgment of the field team, and usually includes an area with a length and width of approximately five to fifteen feet. If observed trash, or other observed pollutants, at the site is determined to pose a threat to human health or the environment, the reporting and response procedures described in the Section 3 of the City's Jurisdictional Runoff Management Program (JRMP) document will be

followed. Site trash assessment is conducted utilizing the trash rating system summarized in Table 2, which was adopted by the Copermittees' Regional Monitoring Workgroup in 2013.

Table 2. Trash Assessment Ratings

Copermittee Data Sharing Format Trash Assessment Ratings
None (0 pieces observed)
Low (<50 pieces observed)
Medium (50-400 pieces observed)
High (>400 pieces observed)

4 Discharge Source Investigation

The discharge source is assessed for all sites that have ponded or flowing water. If a site has flowing water, an upstream investigation may be necessary to determine the source of the discharge. The discharge source is traced upstream with the assistance of the City's MS4 map. While the Municipal Permit requires source investigations for sites with ponded water, sources usually cannot be located since the upstream MS4 line is typically dry at the time of the upstream investigation. Observations and notes are recorded on the field datasheet for evidence of an IC/ID, discharge source, basis for source identification, and source elimination.

4.1 Evidence of Obvious IC/IDs

Evidence of an IC/ID is documented on the field datasheet by listing physical characteristics of the discharge, such as odor, color, clarity, floatables, deposits, high flow rate, non-standard connection, or anything else that may indicate an IC/ID. For example, murky water may indicate washing activity or discharge from a construction site upstream. Follow up investigations are conducted immediately in cases where obvious IC/IDs are observed.

4.2 Discharge Sources

Potential sources of non-storm water discharges include groundwater, seepage, irrigation runoff, vehicle washing, wet cleaning or power washing, construction, pool or spa discharge, tidal, water line break, NPDES permitted discharge, other, or unable to determine. Examples of NPDES permitted discharges include line flushing by local water utilities and groundwater dewatering conducted after obtaining a discharge permit from the RWQCB. More than one source may be recorded if observed during the upstream investigation. If the site is dry, then "na" (not applicable) should be checked on the field datasheet.

If the field crew identifies the source as a controllable source of non-storm water or illegal discharge or connection, the City's Enforcement Response Plan will be implemented to prohibit and eliminate the discharge or connection to the MS4. If the City suspects the source of the non-storm water discharge as natural in origin (i.e. non-anthropogenically influenced) and in

conveyance into the MS4, then the City will document and provide the data and evidence necessary to demonstrate to the RWQCB that it is natural in origin and does not require further investigation.

4.3 Basis for Source Identification

The basis for source identification is noted on the datasheet as an observed discharge, indirect evidence, historical data, or other. A definition of each basis is included below. If the site is dry, or the source is unable to be determined, "na" should be marked on the datasheet.

- Observed Discharge: During the upstream investigation, water is seen discharging to a structure which drains to the site. An example is irrigation runoff from landscaping flowing to a curb inlet upstream from the site.
- Indirect Evidence: An active discharge is not observed, but there is evidence of a recent discharge that may have contributed to water observed at the site. An example is a wet vehicle in a driveway and some ponded water with soap bubbles in a nearby gutter upstream from the site.
- Historical Data: Results of previous monitoring efforts can sometimes be useful in determining the source of the discharge, even when no direct (observed) or indirect evidence of discharge is noted at the time of the present site visit. Other useful historical data may include local groundwater monitoring well data or results from complaint investigations or inspections.

4.4 Discharge Elimination

If the source of the discharge is identified, the source elimination status on the datasheet is recorded as "Yes" if it was eliminated, "No" if it was not eliminated, or "na" if the site was dry. An example of discharge elimination includes discontinued washing activities from a business or resident after speaking with the responsible party. If multiple discharge sources were identified, and some, but not all sources were eliminated, "No" should be marked, and a full explanation of actions taken to eliminate any sources should be described in the comments.

4.5 Discharge Prioritization for Follow-Up Investigation

As part of the field screening, when flowing or ponded water is observed, the field team will review historical data and make observations in the immediate upstream vicinity of the site to see if the primary source or sources of water can be identified. Any identified or suspected specific sources of a discharge will be recorded and placed into one of the categories listed below. These categories differ slightly from the ones described in the County's *San Diego County Permittees Draft Investigation Procedures* manual. However, the categories listed below can be used to prioritize sources for follow-up and are listed in descending order of priority, with Category I being the highest priority.

1. **Category I**: Observed illegal discharges or illegal connections. Discharges in this category may also pose a threat to human or aquatic health.
2. **Category II**: Discharge type prohibited in 2013 Municipal Permit but allowed in the 2007 Municipal Permit. Examples include irrigation runoff and discharges from foundation or footing drains.
3. **Category III**: Source of discharge is unknown or unable to be determined. For instance, if seepage is observed but it is unknown if the water is from interflow or groundwater.
4. **Category IV**: Conditionally exempt discharges, such as individual residential car washing and air conditioning condensate. Note that if observation data, such as high turbidity or sewage smell, indicates that these discharges are significant sources of pollutants, they are classified under Category I instead.
5. **Category V**: Discharges from natural sources or NPDES permitted discharges, such as groundwater infiltration.

Whenever evidence of a Category I discharge is observed, the City's project manager is contacted immediately for direction about whether additional upstream investigation should be completed. Category V sources do not require any follow-up investigation, although detailed documentation should be collected directly or from past studies to prove that water observed in the MS4 is in fact a Category V discharge. For sources classified as Categories II, III, or IV, the following will also be considered, in order of importance and in combination with staff's best professional judgment, when prioritizing for further investigation:

1. **Flow rate:** Higher flow rates are typically placed at a higher priority.
2. **Flow reaches receiving water:** Discharges observed to reach a receiving water body or highly likely to reach a receiving water body should be higher priority than discharges that do not reach the receiving water body.
3. **Historical data:** Sites with that consistently have flowing water should usually be higher priority than sites that sometimes are flowing but sometimes are dry or ponded.

4.6 Additional Investigation Methods

If a discharge source cannot be identified using the typical investigation methods described above, and there is persistent flow or it is possible an IC/ID may be contributing flow to the site, the field team may use alternate methods for identifying the discharge source. Further details regarding different source constituents and follow-up procedures for each source category can be found in the County of San Diego's *San Diego County Permittees Draft Investigation Procedures* manual. A few of the more common alternate source investigation methods are summarized on the following page.

Review of Plans

As-built drawings for the area of concern may be obtained to verify connections. However, an illegal connection is likely to have occurred after the as-built drawings were created, so additional techniques should also be employed.

Dye Testing

Dye testing is useful to confirm hydraulic connections between the potential source and the location downstream. Fluorescent dye is discharged at the source of the potential IC/ID and is monitored downstream. This method is used only when necessary because the public and appropriate regulatory agencies in the surrounding area need to be informed of the cause of the water discoloration.

Smoke Testing

Smoke testing can be used only on underground storm water conveyance facilities, to determine potential hydraulic connections between the source and downstream location. Again, the public and appropriate agencies need to be informed of the cause for smoke coming from the MS4.

Video Monitoring

Mobile video cameras may be used to record observations in an underground storm water conveyance facility. The public and regulatory agencies generally do not need to be informed prior to initiating this kind of investigation.

Confined Space Entry

In some cases, underground conveyances are large enough that a crew trained in confined space entry may investigate the section of pipe or culvert in question instead of using video monitoring. All applicable health and safety regulations must be followed. The public and regulatory agencies, however, generally do not need to be informed prior to initiating a confined space entry.

Potential Sewage IC/IDs

Further testing of suspected sewage-related flows is conducted when visual and odor observations do not adequately confirm the presence of sewage.

- Ammonia - Sewage frequently contains ammonia levels of 30 mg/L or greater. This can be measured with an inexpensive field screening kit.
- Bacteria - Sewage generally has high levels of total and fecal coliforms and *Enterococci*. Sewage treatment plants and many laboratories routinely conduct these indicator analyses.
- When the discharge source is traced to a private property or other public entity, the City may require the responsible party to engage in their own additional investigation and report the findings to the City. Alternatively, the City may choose to perform a joint

investigation with the responsible party or other public entities in order to identify the discharge source.

Additional Field or Laboratory Testing

- Measuring the chlorine concentration and conductivity to assess whether a water line break or leak may be contributing to flow at the site.
- Measuring the conductivity at the site. Higher conductivity values may indicate the infiltration of groundwater into the MS4 pipe, and further investigation may be necessary to confirm this conclusion (e.g. analyzing local ground water monitoring well data if available, sending a camera through the MS4 line, etc).

5 Persistent Flow Outfall Monitoring

Pursuant to Section D.2.b.(2) of the Municipal Permit, if during transitional and routine MS4 outfall discharge monitoring, sites are found to have persistent flow, the City will determine which persistent non-storm water discharges contain pollutant concentrations in excess of the respective non-storm water action level (NAL) at a minimum of five of these sites within its jurisdiction and within each WMA.

The NALs for non-storm water discharges are included in Attachment 2 of this document. If there are less than five persistently flowing sites in a WMA, the City will monitor all of its major MS4 outfalls with persistent flows.

The highest priority sites will be monitored during dry weather at least semi-annually until one of the following occurs:

- The non-storm water discharges have been effectively eliminated (i.e. no flowing, pooled, or ponded water) for three consecutive dry weather monitoring events.
- The source(s) of the persistent flows has been identified as a category of non-storm water discharges that does not require an NPDES permit and does not have to be addressed as an illegal discharge because it was not identified as a source of pollutants (i.e. constituents in non-storm water discharge do not exceed NALs), and the persistent flow can be re-prioritized to a lower priority.
- The constituents in the persistent flow non-storm water discharge do not exceed NALs, and the persistent flow can be re-prioritized to a lower priority.
- The source(s) of the persistent flows has been identified as a non-storm water discharge authorized by a separate NPDES permit.

If none of the conditions listed on the following page are not met, but threat to water quality has been reduced, the site can be reprioritized as a lower priority. The City records removal or re-prioritization of the highest priority persistently flowing MS4 outfalls in the Water Quality Improvement Plan Annual Report.

5.1 Persistent Flow Outfall Discharge Analytical Monitoring

During each semi-annual monitoring event in which measurable flow is present, each Copermittee must collect and analyze samples from each of the highest priority persistent flow MS4 outfall monitoring stations within its jurisdiction. Analytes that are field measured are not required to be analyzed by a laboratory. Grab or composite samples are analyzed at a qualified laboratory for the following constituents:

- Constituents contributing to the highest priority water quality conditions identified in the Water Quality Improvement Plan
- Constituents listed as a cause for impairment of receiving waters in the WMA listed on the 303(d) list
- Constituents for implementation plans or load reduction plans (e.g. Bacteria Load Reduction Plans, Comprehensive Load Reduction Plans) developed for watersheds where the Copermittees are listed responsible parties under the TMDLs in Attachment E of the Municipal Permit
- Applicable NAL constituents
- Constituents listed in Table D-7 of the Municipal Permit (and included in the bulleted list below). The Copermittees may adjust the list of constituents for the WMA if historical data or supporting information can be provided that demonstrates or justifies the analysis of a constituent is not necessary.

Based on the criteria listed above, the City's non-storm water persistent flow outfalls will be monitored semi-annually for the following constituents.

- Total Dissolved Solids
- Total Suspended Solids
- Total Hardness
- Total Phosphorus
- Orthophosphate
- Nitrite
- Nitrate
- Total Kjeldahl Nitrogen
- Ammonia
- Cadmium
- Copper
- Lead
- Zinc
- Total coliform bacteria
- Fecal coliform bacteria (or E. Coli)
- *Enterococcus* bacteria

Additional parameters to be tested and the basis for including the parameter are presented in the table below.

Constituent	Basis for Testing
Chromium	Applicable NAL constituent
Chromium	Applicable NAL constituent

Constituent	Basis for Testing
Dissolved Oxygen	Applicable NAL constituent and 303(d) listed impairment for the San Diego River
Iron	Applicable NAL constituent
Manganese	Applicable NAL constituent and 303(d) listed impairment for the San Diego River
MBAS	Applicable NAL constituent
Nickel	Applicable NAL constituent
pH	Applicable NAL constituent and 303(d) listed impairment for Forester Creek
Selenium	303(d) listed impairment for Forester Creek
Silver	Applicable NAL constituent
Toxicity	303(d) listed impairment for the San Diego River
Turbidity	Applicable NAL constituent

Sampling, analysis and quality assurance/quality control are conducted in accordance with the Quality Assurance Management Plan for the State of California's Surface Water Ambient Monitoring Program, adopted by the State Water Resources Control Board. All chemical, bacteriological, and toxicity analyses will be conducted at a laboratory certified for such analyses by the California Department of Public Health or a laboratory approved by the RWQCB.

6 Enforcement

If the source of a discharge is identified as a category of non-exempt non-storm water discharges, and the discharge is in exceedance of NALs listed in the Water Quality Improvement Plan, then the City will determine if it is an isolated incident or a set of circumstances that will be addressed through its Enforcement Response Plan, or the category of discharge must be addressed and classified as a prohibited discharge.

7 Reporting

All field datasheets, reports, and data associated with the City's MS4 outfall monitoring program will be made available to the RWQCB in a standardized and compatible format. The City's JRMP Annual Report will also include the number of IC/IDs detected, identified, and eliminated within the reporting period. Reporting IC/IDs to other agencies such as the RWQCB and the County of San Diego Department of Environmental Health is discussed in the City's JRMP document.

8 References

California Regional Water Quality Control Board, San Diego Region. May 8, 2013. *Order No. R9-2013-0001.*

County of San Diego. May 2011. *Dry Weather and MS4 Analytical and Field Screening Monitoring Procedures Manual.*

County of San Diego. June 2013. *San Diego County Permittees Draft Investigation Procedures.*

Attachment 1
Dry Weather Major MS4 Outfall Discharge Monitoring Field Datasheet

City of Santee
Dry Weather Major MS4 Outfall Monitoring Field Datasheet

Visit Type: ☐ Visual ☐ Follow-Up ***Station Class:*** ☐ Field ☐ Removed,_____

Site ID:		**Latitude:**	**Outfall Size:**
Location:		**Longitude:**	
		HSA:	
		Observer(s):	
Date:	**Time:**		

Conveyance: (select only one) ☐ Outlet ☐ Manhole ☐ Concrete Channel ☐ Natural Creek ☐ Earthen Channel ☐ Other

Atmospheric Conditions

Weather: ☐ Clear ☐ Partly Cloudy ☐ Overcast ☐ Fog

Last Rain: ☐ > 72 hours ☐ < 72 hours but ≤ 0.1"

Flow

Water Flow: ☐ Flowing ☐ Ponded ☐ Dry **Flow reaches receiving water?:** ☐ Yes ☐ No ☐ Unknown

Flow Rate: _____ ☐ gpm ☐ cfs *Fill in flow rate calculation supporting information below if applicable.*

Flowing Pipe

Diameter		ft
Depth		ft
Velocity		ft/sec

*Flow rate(gpm) = area(ft^2)*velocity(ft/sec)*448.8*
*Area = Ta*diameter^2 (See tabulated values (Ta) chart)*

Filling a Bottle or Known Volume

Volume		mL
Time to Fill		sec

1 Liter/sec = 15.85 gpm

Velocity Area Method (Leaf Float)

Width		in
Depth		in
Velocity		ft/sec

*Flow rate(gpm) = width(ft)*depth(ft)*velocity(ft/sec)*448.8*
Use correction factor of 0.5 to 0.9 depending on conveyance surface roughness.

Observations

Odor:	☐ None	☐ Sewage	☐ Sulfides	☐ Petroleum	☐ Manure	☐ Other ☐ na (dry)
Color:	☐ None	☐ Yellow	☐ Brown	☐ White	☐ Gray	☐ Other ☐ na (dry)
Clarity:	☐ Clear	☐ Cloudy (> 4" vis)	☐ Murky (< 4" vis)			☐ Other ☐ na (dry)
Floatables:	☐ None	☐ Trash	☐ Bubbles	☐ Foam	☐ Oily Sheen	☐ Other ☐ na (dry)
Deposits:	☐ None	☐ Coarse Particulates	☐ Fine Particulates	☐ Stains	☐ Oily Deposits	☐ Other
Structural Condition: (select only one)	☐ Normal	☐ Damaged	☐ Scour Pond	☐ Erosion	☐ Blockage	☐ Other

Trash Assessment

Rating: ☐ High (>400 pieces) ☐ Medium (50 to 400 pieces) ☐ Low (<50 pieces) ☐ None

Evidence of Illegal Dumping: ☐ Yes *(describe in comments)* ☐ No **Potential Threat To:** ☐ Human Health ☐ Aquatic Health

Comments: _____

Source Identification and Elimination

Evidence of Obvious IC/ID: ☐ Odor ☐ Color ☐ Clarity ☐ Floatables ☐ High Flow ☐ Non-Standard Connection ☐ Other _____ ☐ No

Flow Source: ☐ Groundwater ☐ Seepage ☐ Irrigation Runoff ☐ Vehicle Washing ☐ Wet Cleaning ☐ Construction ☐ na (dry)
☐ Pool or Spa ☐ Water Line Break ☐ NPDES Permitted Discharge ☐ Other_____ ☐ Unable to Determine

Basis for Source Identification: ☐ Observed Discharge ☐ Indirect Evidence ☐ Historical Data ☐ Other_____ ☐ na (Not Determined/Dry)

If Identified, Was Source Eliminated? *(If yes, describe in notes below)* ☐ Yes ☐ No ☐ na (dry)

Source ID/Elimination Notes:

Field Screening Samples Collected? ☐ Yes ☐ No **Analytical Lab Samples Collected?** ☐ Yes ☐ No

Water Temp (°C)		NH3-N (mg/L)		NO3 (mg/L)		Ortho-PO4 (mg/L)	
pH (pH units)		Turb. (NTU)		NO3-N (mg/L)		Ortho-PO4 -P (mg/L)	
Cond. (mS/cm)		MBAS (mg/L)					

Attachment 2
Non-Storm Water Action Levels (NALs)

C. ACTION LEVELS

The purpose of this provision is for the Copermittees to incorporate numeric action levels in the Water Quality Improvement Plans. The goal of the action levels is to guide Water Quality Improvement Plan implementation efforts and measure progress towards the protection of water quality and designated beneficial uses of waters of the state from adverse impacts caused or contributed to by MS4 discharges. This goal will be accomplished through monitoring and assessing the quality of the MS4 discharges during the implementation of the Water Quality Improvement Plans.

1. Non-Storm Water Action Levels[7]

The Copermittees must develop and incorporate numeric non-storm water action levels (NALs) into the Water Quality Improvement Plan to: 1) support the development and prioritization of water quality improvement strategies for effectively prohibiting non-storm water discharges to the MS4s, 2) assess the effectiveness of the water quality improvement strategies toward addressing MS4 non-storm water discharges, required pursuant to Provision D.4.b.(1), and 3) support the detection and elimination of non-storm water and illicit discharges to the MS4, required pursuant to Provision E.2.[8]

a. The following NALs must be incorporated:

(1) Non-Storm Water Discharges from MS4s to Ocean Surf Zone

Table C-1. Non-Storm Water Action Levels for Discharges from MS4s to Ocean Surf Zone

Parameter	Units	AMAL	MDAL	Instantaneous Maximum	Basis
Total Coliform	MPN/100 ml	1,000	-	10,000/1,000[1]	OP
Fecal Coliform	MPN/100 ml	200[2]	-	400	OP
Enterococci	MPN/100 ml	35	-	104[3]	OP

Abbreviations/Acronyms
AMAL – average monthly action level
MDAL – maximum daily action level
OP – Ocean Plan water quality objective
MPN/100 ml – most probable number per 100 milliliters

Notes:
1. Total coliform density NAL is 1,000 MPN/100 ml when the fecal/total coliform ratio exceeds 0.1.
2. Fecal coliform density NAL is 200 MPN per 100 ml during any 30 day period.
3. This value has been set to the Basin Plan water quality objective for saltwater "designated beach areas."

[7] NALs incorporated into the Water Quality Improvement Plans are not considered by the San Diego Water Board to be enforceable effluent limitations, unless the NAL is based on a WQBEL expressed as an interim or final effluent limitation for a TMDL in Attachment E and the interim or final compliance date has passed.
[8] The Copermittees may utilize NALs or other benchmarks currently established by the Copermittees as interim NALs until the Water Quality Improvement Plans are accepted by the San Diego Water Board Executive Officer.

(2) Non-Storm Water Discharges from MS4s to Bays, Harbors, and Lagoons/Estuaries

Table C-2. Non-Storm Water Action Levels for Discharges from MS4s to Bays, Harbors, and Lagoons/Estuaries

Parameter	Units	AMAL	MDAL	Instantaneous Maximum	Basis
Turbidity	NTU	75	-	225	OP
pH	Units	Within limit of 6.0 to 9.0 at all times			OP
Fecal Coliform	MPN/100 ml	200[1]	-	400[2]	BP
Enterococci	MPN/100 ml	35	-	104[3]	BP
Priority Pollutants	µg/L	See Table C-3			

Abbreviations/Acronyms:
AMAL – average monthly action level
MDAL – maximum daily action level
OP – Ocean Plan water quality objective
BP – Basin Plan water quality objective
NTU – Nephelometric Turbidity Units
MPN/100 ml – most probable number per 100 milliliters
µg/L – micrograms per liter

Notes:
1. Based on a minimum of not less than five samples for any 30-day period.
2. The NAL is reached if more than 10 percent of total samples exceed 400 MPN per 100 ml during any 30 day period.
3. This value has been set to the Basin Plan water quality objective for saltwater "designated beach areas" and is not applicable to water bodies that are not designated with the water contact recreation (REC-1) beneficial use.

Table C-3. Non-Storm Water Action Levels for Priority Pollutants

		Freshwater (CTR)		Saltwater (CTR)	
Parameter	Units	MDAL	AMAL	MDAL	AMAL
Cadmium	µg/L	**	**	16	8
Copper	µg/L	*	*	5.8	2.9
Chromium III	µg/L	**	**	-	-
Chromium VI	µg/L	16	8.1	83	41
Lead	µg/L	*	*	14	2.9
Nickel	µg/L	**	**	14	6.8
Silver	µg/L	*	*	2.2	1.1
Zinc	µg/L	*	*	95	47

Abbreviations/Acronyms:
CTR – California Toxic Rule
µg/L – micrograms per liter
AMAL – average monthly action level
MDAL – maximum daily action level

Notes:
* Action levels developed on a case-by-case basis (see below)
** Action levels developed on a case-by-case basis (see below), but calculated criteria are not to exceed Maximum Contaminant Levels (MCLs) under the California Code of Regulations, Title 22, Division 4, Chapter 15, Article 4, Section 64431

The Cadmium, Copper, Chromium (III), Lead, Nickel, Silver and Zinc NALs for MS4 discharges to freshwater receiving waters will be developed on a case-by-case basis based on site-specific water quality data (receiving water hardness). For these priority pollutants, refer to 40 CFR 131.38(b)(2).

(3) Non-Storm Water Discharges from MS4s to Inland Surface Waters

Table C-4. Non-Storm Water Action Levels for Discharges from MS4s to Inland Surface Waters

Parameter	Units	AMAL	MDAL	Instantaneous Maximum	Basis
Dissolved Oxygen	mg/L	Not less than 5.0 in WARM waters and not less than 6.0 in COLD waters			BP
Turbidity	NTU	-	20	See MDAL	BP
pH	Units	Within limit of 6.5 to 8.5 at all times			BP
Fecal Coliform	MPN/100 ml	200[1]	-	400[2]	BP
Enterococci	MPN/100 ml	33	-	61[3]	BP
Total Nitrogen	mg/L	-	1.0	See MDAL	BP
Total Phosphorus	mg/L	-	0.1	See MDAL	BP
MBAS	mg/L	-	0.5	See MDAL	BP
Iron	mg/L	-	0.3	See MDAL	BP
Manganese	mg/L	-	0.05	See MDAL	BP
Priority Pollutants	µg/L	See Table C-3			

Abbreviations/Acronyms:
AMAL – average monthly action level
BP – Basin Plan water quality objective
COLD – cold freshwater habitat beneficial use
NTU – Nephelometric Turbidity Units
mg/L – milligrams per liter
MDAL – maximum daily action level
WARM – warm freshwater habitat beneficial use
MBAS – Methylene Blue Active Substances
MPN/100 ml – most probable number per 100 milliliters
µg/L – micrograms per liter

Notes:
1. Based on a minimum of not less than five samples for any 30-day period.
2. The NAL is reached if more than 10 percent of total samples exceed 400 MPN per 100 ml during any 30 day period.
3. This value has been set to the Basin Plan water quality objective for freshwater "designated beach areas" and is not applicable to water bodies that are not designated with the water contact recreation (REC-1) beneficial use.

b. If not identified in Provision C.1.a, NALs must be identified, developed and incorporated in the Water Quality Improvement Plan for any pollutants or waste constituents that cause or contribute, or are threatening to cause or contribute to a condition of pollution or nuisance in receiving waters associated with the highest priority water quality conditions related to non-storm water discharges from the MS4s. NALs must be based on:

(1) Applicable water quality standards which may be dependent upon site-specific or receiving water-specific conditions or assumptions to be identified by the Copermittees; or

(2) Applicable numeric WQBELs required to meet the WLAs established for the TMDLs in Attachment E to this Order.

c. For the NALs incorporated into the Water Quality Improvement Plan, the Copermittees may develop and incorporate secondary NALs specific to the Watershed Management Area at levels greater than the NALs required by Provisions C.1.a and C.1.b which can be utilized to further refine the prioritization and assessment of water quality improvement strategies for effectively prohibiting non-storm water discharges to the MS4s, as well as the detection and elimination of non-storm water and illicit discharges to and from the MS4. The