

Executive Summary

The City's eighth Annual Report submitted pursuant to the San Diego Municipal Stormwater Permit (NPDES Order 2007-01, "Permit") represents an opportunity to further explore and develop effectiveness assessment measures as well as re-vamp existing programs to better reflect the new Permit.

Several programmatic changes reflected in this year's report have been made in response to regulatory feedback received from the Regional Water Quality Control Board (RWQCB) and the Environmental Protection Agency (EPA). In particular, the RWQCB and the EPA's review of the Lemon Grove Standard Urban Stormwater Mitigation Plan (SUSMP) prompted a more focused effort on plan reviews, development and re-development strategies, and construction site management.

To respond to their comments and the new Permit, the City is implementing various methods to further assist in long-term effectiveness assessments. The methods are currently under revision and in a state of flux through participation in regional standardization efforts. The City will maintain existing standards, while the regional efforts continue to take shape and develop further.

Through a collaborative workgroup process with the Copermittees, the City has significantly improved our assessment strategies and analysis methods. The Copermittees worked extensively on the completion of the Report of Waste Discharge (ROWD) during FY 2004-05. The ROWD is a collaborative effort discussing the Copermittees requests and findings for the issuance of the 2006 Permit. The Copermittees also collaborated with an independent contractor to create a formal effectiveness assessment. Both the ROWD and the long-term effectiveness assessment documents were submitted to the RWQCB separately from the Annual Reports. However, the Copermittees worked extensively on these projects during FY 2004-05 and the City's participation is worthy of notice. The documents provided valuable information that the Copermittees will be using during the next reporting period to fine tune effectiveness assessment and program focus. In 2008, the City updated its JURMP and Municipal Codes to reflect the requirements of the new Permit, Order 2007-01. The Model SUSMP was completed by the Copermittees and submitted for Regional Board approval during this reporting period and will be added to the City's Municipal Code in the next reporting period. In FY 2009-10, the City continued its extensive involvement in joint Copermittee workgroups. The City feels the collaboration is necessary to develop and maintain a well-rounded, effective program and ensure regional stability for water quality improvements.

The City continues to improve and develop its own program effectiveness assessment strategies. The ROWD and the long-term effectiveness assessment have been extremely useful tools in helping not just the City, but the Copermittees, in analyzing the current available data. The documents have

helped identify areas of improvement and program focus. The long-term effectiveness document will be critical in the City's and the Copermittee's development of regional activities to address improved water quality and pollution prevention.

The City has taken important steps in putting newly developed strategies in motion. In particular, the City has continued to develop its BMP implementation strategy for construction sites and development proposals. During FY 2005-06, the City focused on improving its SUSMP checks, the tracking of construction site inspections, and the development of consistent standards in the Planning and Engineering Departments. The City continues these efforts into FY 2009-10. Employee training continued to focus on SUSMP implementation and those departments directly affected by the document through regularly scheduled inter-departmental meetings. In FY 2009-10, the City continues to make significant steps toward the implementation of a City-wide GIS program, including the beginning of service contract to install GIS layers for the sanitary sewer system. Other departments and layers will be added as the budget allows. Currently the budget does not allow for other layers, but the City hopes this will change in future reporting periods, although perhaps not until the next permit cycle. The implemented Code Enforcement program continues to improve in efficiency and effectiveness, including a new staff member, who functions as a water quality inspector and code enforcement officer. The City realizes that many of these new approaches are in their infancy, some still in exploration, but future reporting periods will further demonstrate the new concepts and ideals discussed in this report.

In FY 2005-06, the City created an independent funding source to help fund its program. However, the funding source only funds a small portion of the program, requiring the City's strapped General Fund to finance this increasingly expensive program. This shortage of steady funding is even more prevalent this reporting period and in the short-term future, due to cuts in State funding and a lack of reimbursements from the State. Proposition 218 and the current economy make it even more difficult to obtain funding for the water quality program and future environmental legislation. It is even more important now, that the City take into account effectiveness and efficiency in its programs, especially its environmental programs. The City appreciates the Regional Boards understanding in these times of fiscal hardship.