

Lemon Grove's ninth annual report, submitted pursuant to the San Diego Municipal Stormwater Permit (NPDES Order 2007-01, "Permit"), represents the City's continued efforts to document and assess a full year of program implementation (July 1, 2009 through June 30, 2010). We are confident that the report demonstrates success in the continued development of a program that meets and often exceeds Permit requirements. At the same time, the annual reporting process presents a cumbersome challenge to City staff when combined with participation in the WURMP reporting process, the annual RURMP report, and the Dry Weather reporting process. The City strongly supports the concept of an all encompassing City and Regional program that increases effectiveness and efficiency to the maximum extent practicable. The myriad of reports causes disconnects between programs that should run seamlessly together. The City also feels a stronger regional program could help alleviate the cost burden the current program forces on the City. The end result would be a maximization of severely scarce funds and funding. The City is currently experiencing, as are many others, serious financial hardship due primarily to the economy and the State raids on local funds to support its own programs. The loss of revenue in the past year has forced the City to redistribute General Funds to maintain even basic service levels, such as pothole repair. The City feels the current program meets regulatory requirements, but is leery of program expansion without a secure revenue source. The unfunded mandate aspect of this program continues to stress the City's already stretched thin General Fund. The City encourages the Regional Board to take a stronger leadership role in facilitating more cooperation with State agencies in obtaining long-term funding for this program. The City hopes that in future reporting periods, some of these challenges can be met with more cooperation between the Copermitees and the Regional Board.

This report continues to demonstrate several programmatic changes in response to regulatory feedback received from the Regional Water Quality Control Board (RWQCB) and the Environmental Protection Agency (EPA). In particular, the March 2005 SUSMP audit performed by the RWQCB and the EPA prompted a reassessment of the City's SUSMP requirements and plan check procedures. The City chose to focus its improvement efforts in the SUSMP area. The City implemented a construction site inspection database to allow for future assessment strategies. The City's construction and BMP databases continue to evolve as more information is gathered and tracked. Water Quality staff continues active involvement with environmental legislation affecting CEQA requirements and green house gas emission standards. The City believes in a comprehensive and collaborative approach for environmental concerns and solutions. The City is working on a strategy to map its waterways and drainage channels for a future GIS map layer. The City is actively exploring its GIS options and hopes to have GIS capabilities in the next 5 years. The City began developing a basic needs assessment and schedule for the implementation of a

city-wide GIS program. The City is currently working on implementing initial GIS programs and layers through the Sanitation District. These initial layers will include the mapping of our sewer mains and City maintained laterals, as well as the tracking of maintenance activities. All further implementation is dependant on budgetary restrictions. The City and the Copermittees are moving toward a more quantitative and qualitative approach to reporting and operations, while faced with sever economic challenges both on a local and state level.

At the jurisdictional level, the city has taken important steps in putting newly developed strategies in motion. The City continued to enhance its BMP implementation process. The City continued to improve the assessment tools through inspection databases and the plan check process. The City continues to explore effective assessment options that fit within the budgetary confines and meet the requirements of the Permit. The City continues to explore its existing systems to better track water quality data. Current financial restraints limit the implementation of new programs and software. Though the tools are often imperfect and must continue to evolve, we have already found their use to be quite instructive in many ways.

The City believes the programs described in this report to be significantly expanded and improved over past efforts. Some accomplishments of particular note include the following:

- ❖ Use of community events for public outreach
- ❖ Improved code enforcement process for water quality
- ❖ A new in-house water quality inspector and code enforcement officer
- ❖ Participation in regional workshops pertaining to new and pending environmental legislation
- ❖ Increased involvement in WURMP programming
- ❖ A burgeoning sustainability program of which stormwater is a key element

This report is organized according to the general outline agreed upon by the Copermittees. Sections 2.0 through 7.0, each corresponding to a different category of pollutant sources (i.e. Municipal, Commercial, Residential), are organized as follows:

- ❖ Priority Sources
- ❖ BMP Requirements
- ❖ BMP Implementation
- ❖ Compliance and Enforcement

Where possible, all applicable data and information are consolidated into the sections to which they best apply so as to present a more holistic and self-contained description of each program area. For example, section 5.0 discusses every program element related to the City's commercial and industrial component (e.g. outreach to commercial audiences, inspections of businesses, responses to

public complaints involving commercial dischargers, and enforcement actions taken against non-compliant businesses).

Sections 8.0 through 10.0 are intended only to summarize key statistics, and to address topics not covered in previous sections. Section 11.0 provides a consolidated assessment of key program data and information. Much of this data is also presented in greater detail in sections 2.0 through 8.0. Section 12.0 provides an analysis of the City's projected expenditures for FY 2009-10. Section 13.0 discusses the City's conclusions and recommendations based on its assessment of this year of implementation under the Permit.

Overall, this report demonstrates, in a clear and well-organized way, the considerable thought and energy that went into developing and implementing a complex and rigorous program. The City looks forward to continued progress in future years.