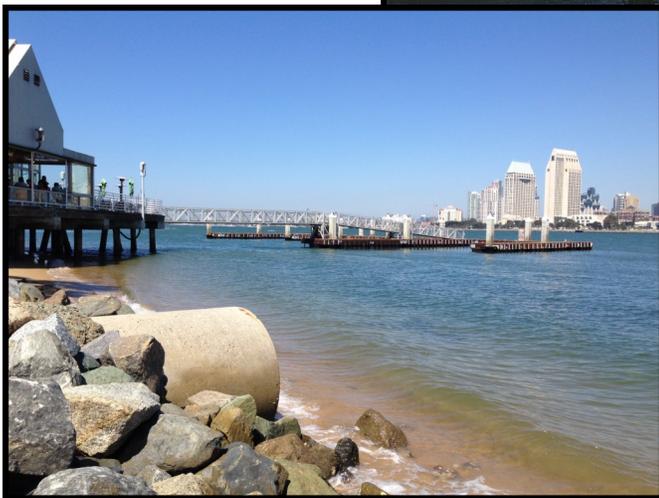
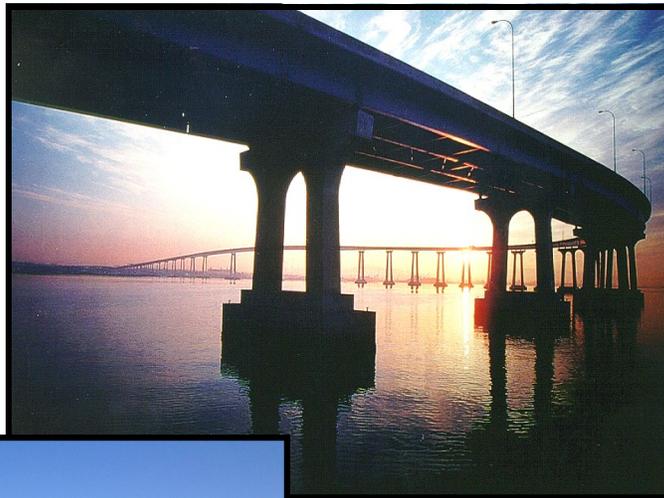


City of Coronado



Jurisdictional Runoff Management Plan

June 2015



**Municipal Storm Water Permit
San Diego Regional Water Board
NPDES Order No. CAS0109266**

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Acronyms

City of Coronado Storm Water Division

AMAL	Average Monthly Action Level
Basin Plan	Water Quality Control Plan for the San Diego Basin
BMP	Best Management Practice
BPJ	Best Professional Judgment
CASQA	California Stormwater Quality Association
CEQA	California Environmental Quality Act
CGP	Construction General Permit
CIP	Capital Improvement Project
City	City of Coronado
CMC	Coronado Municipal Code
County	County of San Diego
CWA	Clean Water Act
EPA	United States Environmental Protection Agency
ERP	Enforcement Response Plan
ESA	Environmentally Sensitive Area
HSA	Hydrologic Sub-Area
HU	Hydrologic Unit
IDDE	Illicit Discharge Detection and Elimination
JRMP	Jurisdictional Runoff Management Plan
LID	Low Impact Development
MAP	Monitoring and Assessment Plan
MDAL	Maximum Daily Action Level
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer Systems
NAL	Numeric Action Level
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
O&M	Operation and Maintenance
PDP	Priority Development Project
Permit	California Water Quality Control Board San Diego Region, National Pollutant Discharge Elimination System Permit No. CAS0109266, Order No. R9-2013-0001, dated May 8, 2013



San Diego Water Board	California Water Quality Control Board San Diego Region
SIC	Standard Industrial Classification
SOP	Standard Operating Procedure
SSO	Sanitary Sewer Overflow
State Water Board	State Water Resources Control Board
SWMP	Storm Water Management Plan
TMDL	Total Maximum Daily Loads
TRACKiT	City of Coronado's permit tracking system
WDID	Waste Discharge Identification
WDRs	Waste Discharge Requirements
WMA	Watershed Management Area
WQIP	Water Quality Improvement Plan
WQSA	Water Quality Sensitive Area



Section 1 Introduction

City of Coronado Storm Water Division

This document describes the City of Coronado's Jurisdictional Runoff Management Plan (JRMP) in accordance with Provision E – Jurisdictional Urban Runoff Management Programs and Provision F – Reporting in the California Water Quality Control Board San Diego Region (San Diego Water Board) National Pollutant Discharge Elimination System (NPDES) Permit No. CAS0109266 (Permit), Order No. R9-2013-0001 dated May 8, 2013. The Permit outlines waste discharge requirements (WDRs) for discharges from Municipal Separate Storm Sewer Systems (MS4) draining the watersheds within the San Diego region. A copy and/or link to the Permit is found in the Storm Water Standards Manual, Section 1-A.

The signed JRMP certification statement required by Standard Permit Provision 1.k found in Permit Attachment B is provided in Section 1-B of the Storm Water Standards Manual and also as part of the San Diego Bay Water Quality Improvement Plan (WQIP) submittal of June 2015.

1.1 Background

1.1.1 Overview of the City of Coronado

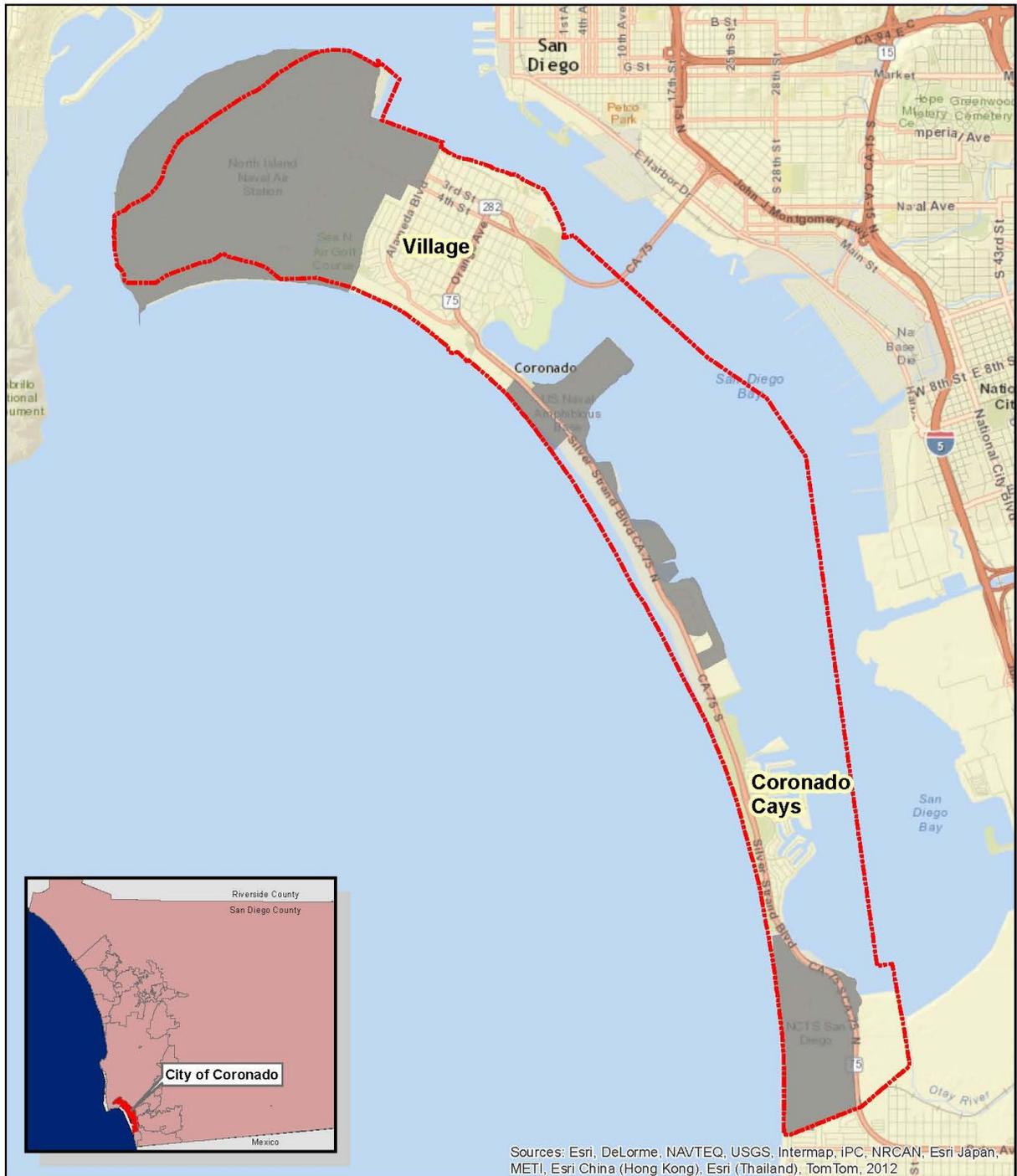
The City of Coronado (City) was incorporated in 1890. Coronado has a population of 24,697 (SANDAG 1/1/2010). Approximately 19,321 residents live in two geographically distinct areas referred to as the “Village” and the “Cays.” Approximately 4,595 residents are military personnel and their dependents (group quarters category), housed on the military base(s) and at Navy housing on the Silver Strand. With no increase in “buildable” area, population in the Village and the Cays is projected to increase, although at a slow phase, to approximately 28,000 by 2050. The City is composed of 9,562 housing units with 3,902 detached single family, 1,533 multiple unit single family, and 4,127 multi-family. There are no mobile homes in Coronado.

Additionally, Coronado's daytime population more than doubles with commuters who are employed by businesses, the local government and the military.

The City is almost entirely surrounded by water. Bordered by the Pacific Ocean, and the San Diego Bay, Coronado's 28 miles of coastline supports a variety of recreational activities, environmental habitats and resources, military activities, and residential and visitor activities (Figure 1-1). The City exercises an influence over this entire area; however, its authority to regulate storm water and non-storm water activity is limited to 7.8 square miles of land. Within this 7.8 square mile area, Coronado has the lead authority, cooperates and in some cases shares regulatory responsibilities with Caltrans for SR75 and SR282, the San Diego Unified Port District for the areas (Tidelands) within their District on and adjacent to San Diego Bay and Glorietta Bay and the State of California is the operator of the Silver Strand State Beach.



Figure 1-1
City of Coronado Jurisdictional Boundaries



Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, iPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2012

<p>Legend</p> <p> City Boundary</p> <p> Military Owned</p>	<p>FIGURE 1-1</p> <p>City of Coronado</p> <p>Storm Water Program</p>	<p style="text-align: center;">N W—+—E S</p> <p style="text-align: center;">1 inch = 6,500 feet</p> <p style="text-align: center;">0 0.25 0.5 1 Miles</p>
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Compass Rose GIS, 12/20/2014



The City works closely with these agencies in implementing storm water programs. The remaining approximately 5.7 square miles are Navy installations under the control of the United States government.

Coronado's topography is relatively flat, with its highest elevation approximately 60 feet, and an average elevation of approximately 20 feet above sea level. Over time, numerous landfill, dredging and diking projects have altered Coronado's size, shoreline and elevation. Most of these projects created areas for residential, military and recreational uses.

Visitors, residents, and those who work in the community enjoy the natural beauty and the charming ocean village atmosphere. Coronado is proud of its image as a picturesque, pristine small town. The quality of Coronado's surrounding waters plays a vital part in its community lifestyle and economy. Coronado's coastline (surrounding waters and beaches) is its most important asset; as such, Coronado is committed to protecting, maintaining and enhancing its coastal resources and water quality.

1.1.2 Regulatory Setting

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was significantly reorganized and expanded in 1972 [33 U.S.C. §1251 et seq. (1972)]. "Clean Water Act" became the Act's common name with amendments in 1972.

Under the CWA, the United States Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry. The EPA has also set water quality standards for contaminants or pollutants in surface waters.

The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's NPDES permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters.

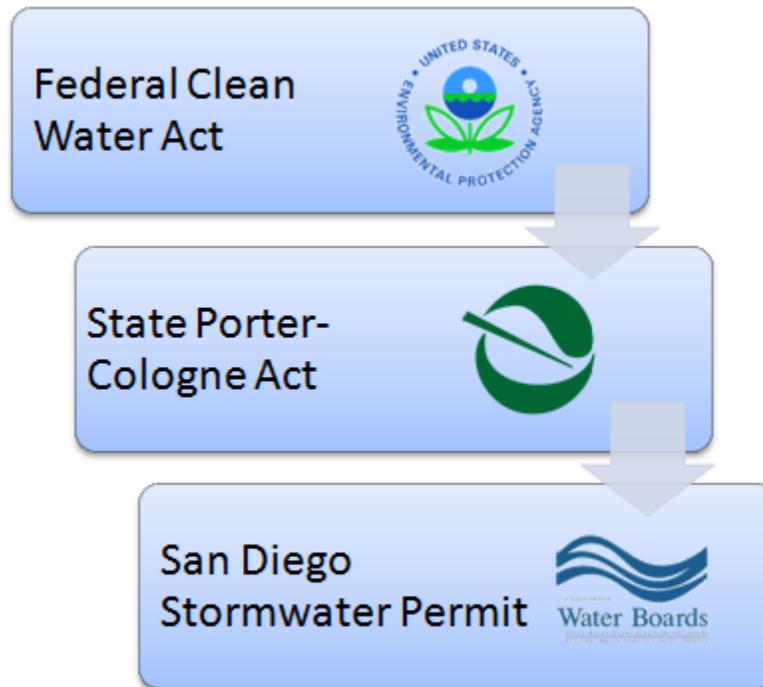
The primary objective of the CWA is to restore and maintain the chemical, physical and biological integrity of the nation's waters. This objective is comprised of two fundamental goals: 1) eliminate the discharge of pollutants into the nation's waters, and 2) achieve water quality levels that are fishable and swimmable.

In 1987, Congress amended the CWA and established new schedules for industrial and municipal storm water discharges to be regulated by NPDES permits. The NPDES permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States.



In California, the CWA and NPDES permit program is implemented by the State Water Resources Control Board (State Water Board) through nine Regional Water Boards. The San Diego Water Board implements this and other programs, regulations and compliance in San Diego County (County). Figure 1-2 shows the overall storm water program regulatory framework.

**Figure 1-2
Storm Water Program Regulatory Framework Schematic**



The 2013 Municipal Storm Water Permit (Permit) is the 4th term permit issued by the San Diego Water Board pursuant to Section 402 of the CWA and implementing regulations (Code of Federal Regulations [CFR] Title 40, Part 122 [40 CFR § 122]) adopted by the EPA, and Chapter 5.5, division 7 of the California Water Code commencing with Section 13370. This Permit serves as an NPDES permit for discharges from MS4s to surface waters and serves as WDRs pursuant to Article 4, Chapter 4, Division 7 of the California Water Code commencing with Section 13260.

The regional nature of this Permit aims to ensure consistency of regulation within watersheds in the County and is expected to result in overall cost savings for the Copermitees and the San Diego Water Board.

The federal regulations make it clear that the Copermitees need only comply with permit conditions relating to discharges from the MS4s for which they are operators (40 CFR § 122.26(a)(3)(vi)). The Permit does not require the Copermitees to manage storm water outside



of their jurisdictional boundaries, but rather to work collectively to improve storm water management within watersheds.

NPDES permits for storm water discharges from MS4s must include requirements to effectively prohibit non-storm water discharges into MS4s, and require controls to reduce the discharge of pollutants in storm water to the Maximum Extent Practicable (MEP), and to require other provisions as the San Diego Water Board determines are appropriate to control such pollutants.

The Permit prescribes conditions to assure compliance with the CWA requirements for owners and operators of MS4s, such as the City of Coronado, to effectively prohibit non-storm water discharges into the MS4s, and require controls to reduce the discharge of pollutants in storm water from the MS4s to the MEP.

Nevertheless, non-storm water discharges into and from the MS4s continue to be reported to the San Diego Water Board by the Copermittees and other persons. Monitoring conducted by the Copermittees, as well as information supporting the 303(d) list of water quality limited water bodies, have identified dry weather, non-storm water discharges from the MS4s as a source of pollutants causing or contributing to receiving water quality impairments in the San Diego Region. The federal regulations (40 CFR § 122.26(d)(2)(iv)(B)(1)) require the Copermittees to have a program to prevent illicit discharges to the MS4.

The federal regulations, however, allow for specific categories of non-storm water discharges or flows to be addressed as illicit discharges only where such discharges are identified as sources of pollutants to waters of the U.S. The Permit lists the specific categories of non-storm water discharges consider illicit discharges in the San Diego Region.

The term *pollutant* is defined very broadly by the NPDES regulations and litigation and includes any type of industrial, municipal, and agricultural waste discharged into water. For regulatory purposes, pollutants have been grouped into three general categories under the NPDES Program: *conventional*, *toxic*, and *non-conventional*. Section 304(a)(4) of the CWA designated the following as *conventional pollutants*: 1) five day biochemical oxygen demand (BOD₅); 2) total suspended solids (TSS); 3) pH; 4) fecal coliform; and 5) oil and grease (O&G) (added in 1979 in 40 CFR § 401.16). *Toxic pollutants*, or *priority pollutants*, are those defined in Section 307(a)(1) of the CWA and include metals and manmade organic compounds. *Non-conventional pollutants* are those that do not fall under either of the above categories, and include such parameters as ammonia, nitrogen, phosphorus, chemical oxygen demand (COD), and whole effluent toxicity (WET).

Point sources are discrete conveyances such as pipes or man-made ditches. Typical point source discharges include discharges from publicly owned treatment works, discharges from industrial facilities, and discharges associated with urban runoff and storm water.



The EPA's definition of the term *waters of the United States* has become more complex and in some cases confusing following Supreme Court decisions and ongoing rulemaking by the EPA and U.S. Army Corps of Engineers. Generally the term includes:

- Navigable waters,
- Tributaries of navigable waters,
- Interstate waters,
- Wetlands (new)
- Intrastate lakes, rivers, and streams (revised to include ephemeral streams) which are:
 - used by interstate travelers for recreation and other purposes;
 - sources of fish or shellfish sold in interstate commerce; or
 - utilized for industrial purposes by industries engaged in interstate commerce.

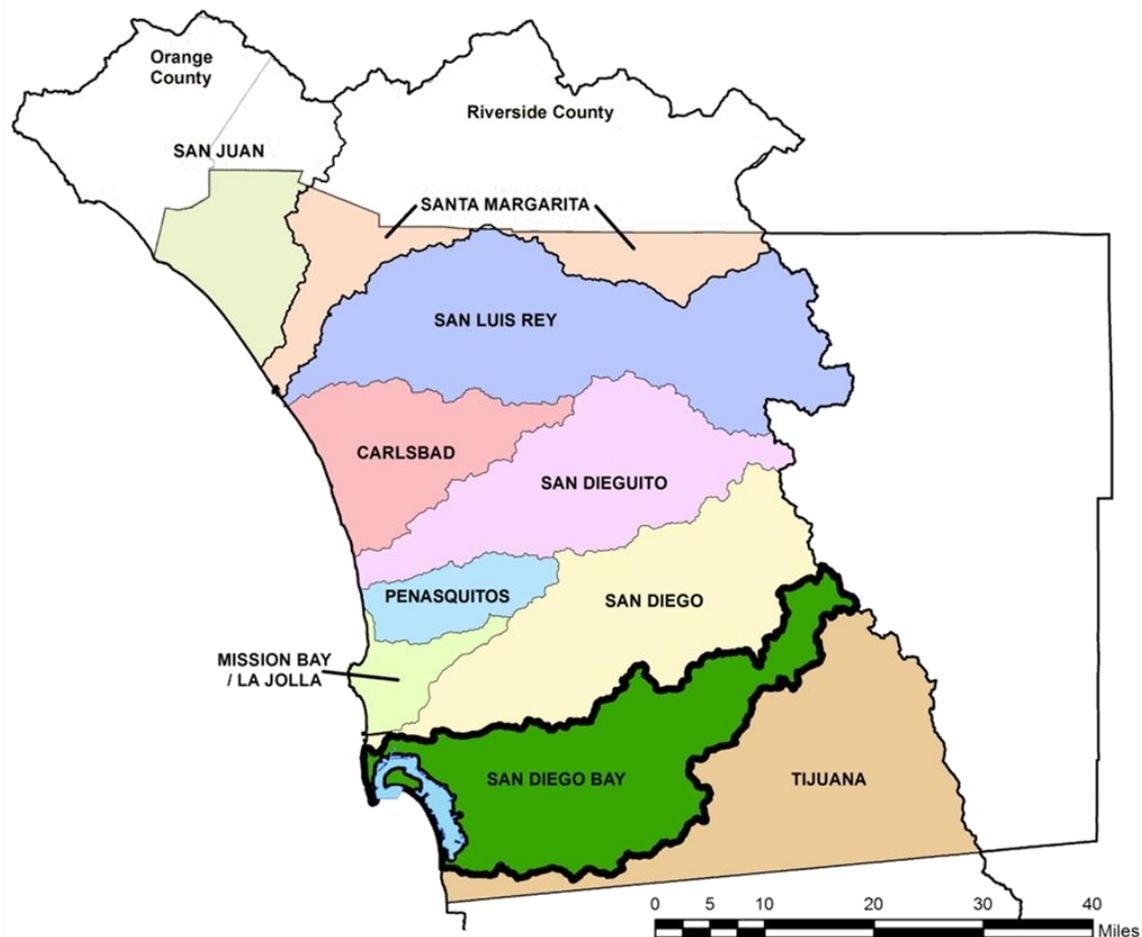
Since the introduction of the NPDES permit program, the quality of rivers, lakes and bays has improved and the listing of impaired waters clearly established as a result of cooperative efforts by federal, state, tribal and local governments.

1.2 Watershed Management Area

The San Diego Bay Watershed Management Area (WMA) is one of nine watersheds in the County regulated by the San Diego Water Board. The San Diego Bay WMA encompasses a 444-square-mile area (approximately 284,500 acres) extending eastward from the San Diego Bay for more than 50 miles to the Laguna Mountains as shown in Figure 1-3.



Figure 1-3
San Diego Bay Watershed within San Diego County



The WMA ranges in elevation from sea level at San Diego Bay to a maximum elevation of approximately 6,000 feet above sea level at the eastern boundary. Most of the WMA land area lies north of the Tijuana River WMA, south of the San Diego River WMA, west of the Anza Borrego WMA, and east of the Pacific Ocean.



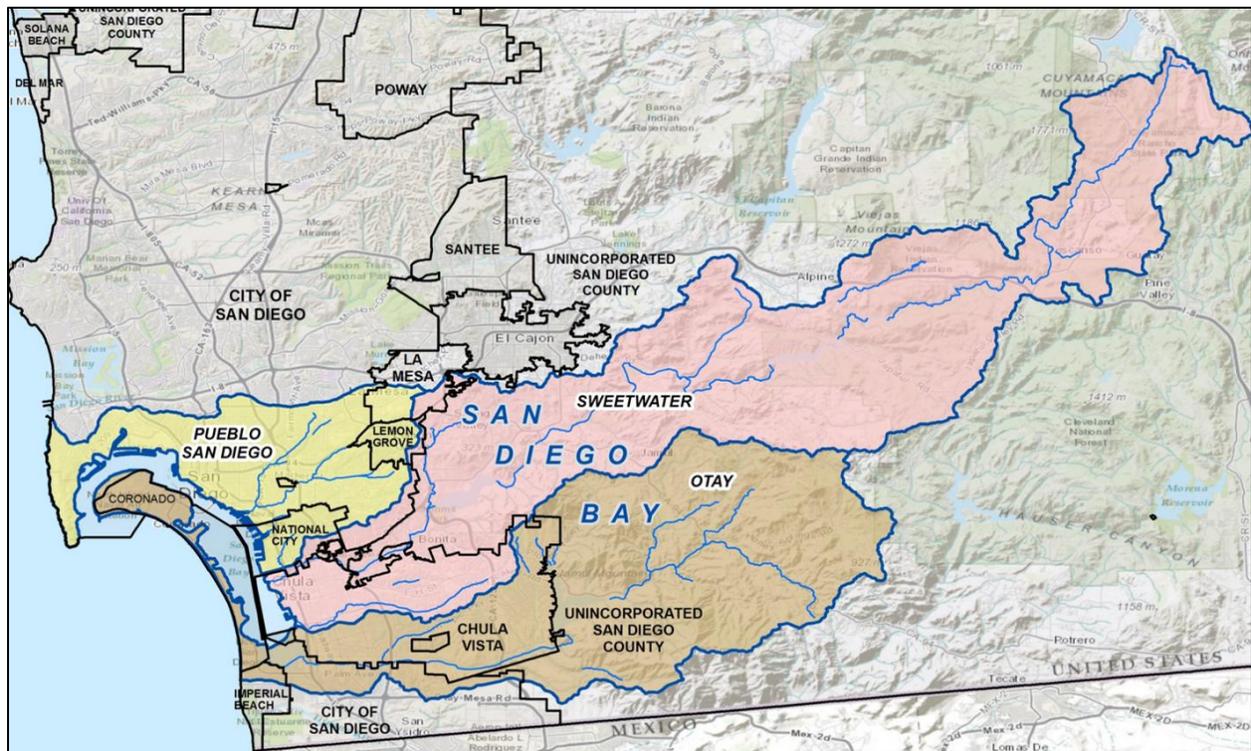
The Regional Water Board-prepared *Water Quality Control Plan for the San Diego Basin* (Basin Plan) (Regional Board, 1994) defines the San Diego Bay WMA as containing three hydrologic units (HU):



1. Pueblo San Diego
2. Sweetwater River
3. Otay River

The delineation of the HUs for the San Diego Bay WMA are shown in Figure 1-4, including city boundaries and blue lines the major upstream waterways.

Figure 1-4
Hydrologic Units of the San Diego Bay Watershed



Most freshwater input to the San Diego Bay is from surface runoff from urban areas and intermittent flow from rivers and creeks during rain events. Dams and extensive use of groundwater over the past century in the Sweetwater and Otay Rivers have significantly reduced the input from these rivers to the Bay (San Diego Bay WURMP, 2003).

The Otay River HU is the southernmost HU in the San Diego Bay WMA and includes the Port of San Diego, the County of San Diego, and the cities of Imperial Beach, Chula Vista and San Diego.

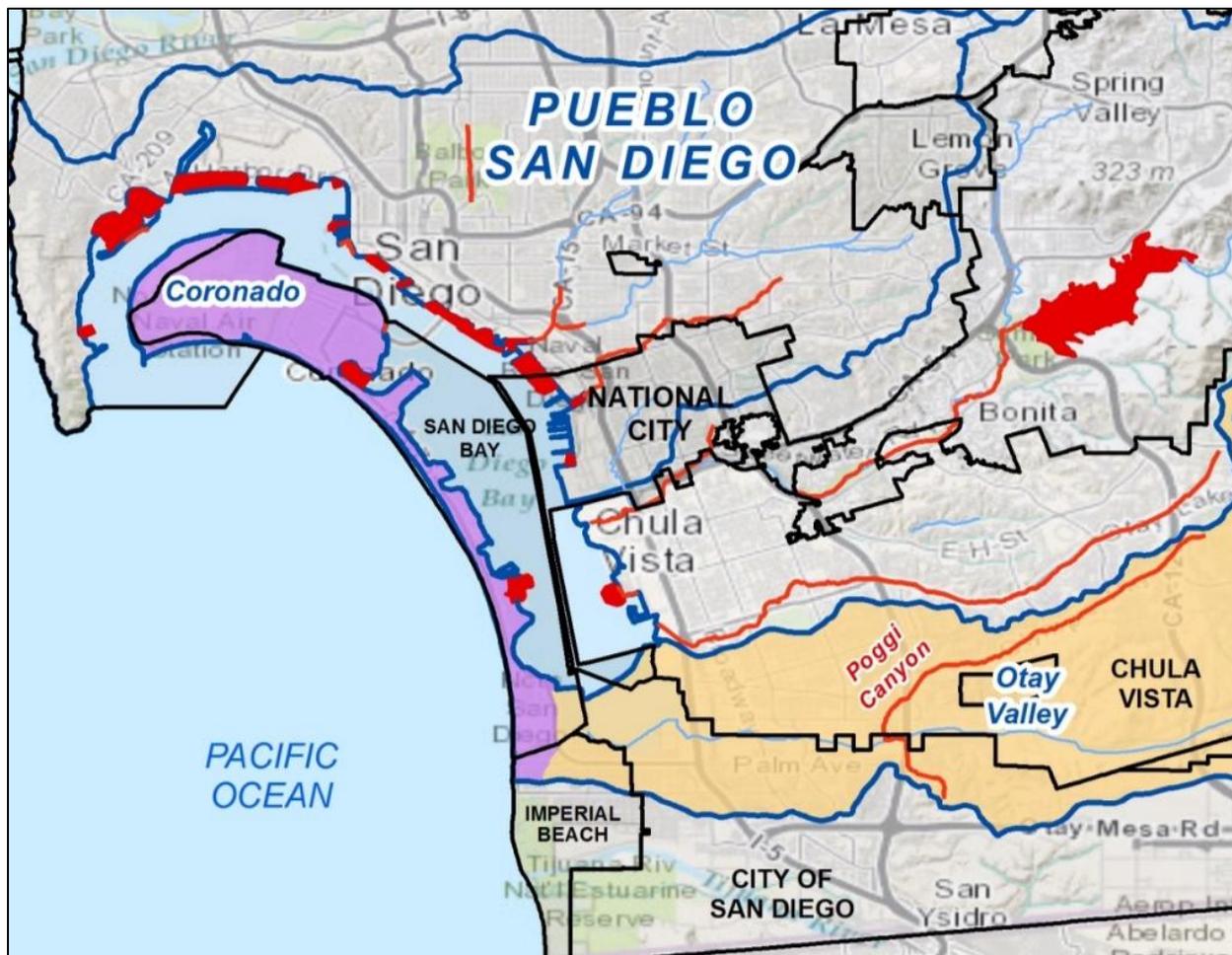


Provision B of the Permit designates the County's Hydrologic Units by Watershed Management Areas for the purpose of implementing Water Quality Improvement Plans and identifying the Copermittees charged with the development and implementation of both watershed and jurisdictional programs.

The City is located in the Coronado Hydrologic Sub-Area (HSA) that is part of the greater Otay River HU as shown in purple in Figure 1-5. The Coronado HSA includes the Port of San Diego and the cities of Coronado and Imperial Beach.

The San Diego Bay WMA Responsible Copermittees are shown by HSA in Table 1-1.

**Figure 1-5
Coronado Hydrologic Sub-Area**





**Table 1-1
San Diego Bay WMA Jurisdictional Breakdown by Hydrologic Sub-Area**

Responsible Copermittee	San Diego Bay WMA								
	Pueblo			Sweetwater River			Otay River		
	908.1	908.2	908.3	909.1	909.2	909.3	910.1	910.2	910.3
Airport Authority		✓							
City of Chula Vista				✓				✓	✓
County of San Diego		✓		✓	✓	✓		✓	✓
City of Coronado							✓		
City of Imperial Beach							✓	✓	
City of La Mesa		✓		✓					
City of Lemon Grove		✓		✓					
City of National City			✓	✓					
Port of San Diego	✓	✓	✓	✓			✓		
City of San Diego	✓	✓	✓	✓				✓	

1.2.1 303(d) Impaired Waters and Environmentally Sensitive Areas

Under Section 303(d) of the 1972 CWA, territories and authorized tribes are required to develop lists of impaired water bodies. These impaired waters do not meet water quality standards or support designated beneficial uses. The law requires that priority rankings be established for the impaired water bodies on the 303(d) list and that Total Maximum Daily Loads (TMDLs) be developed to improve water quality. The Ducheny Bill (AB 1740) requires the State Water Board and its nine Water Boards to post the 303(d) list water bodies and to provide an estimated completion date for each TMDL.

The State Water Board prepares revisions to the 303(d) list every two to four years. The 2010 303(d) list for the Otay River HU, included in Table 1-2 and illustrated in Figure 1-6, is the most recently available published with approval by EPA.

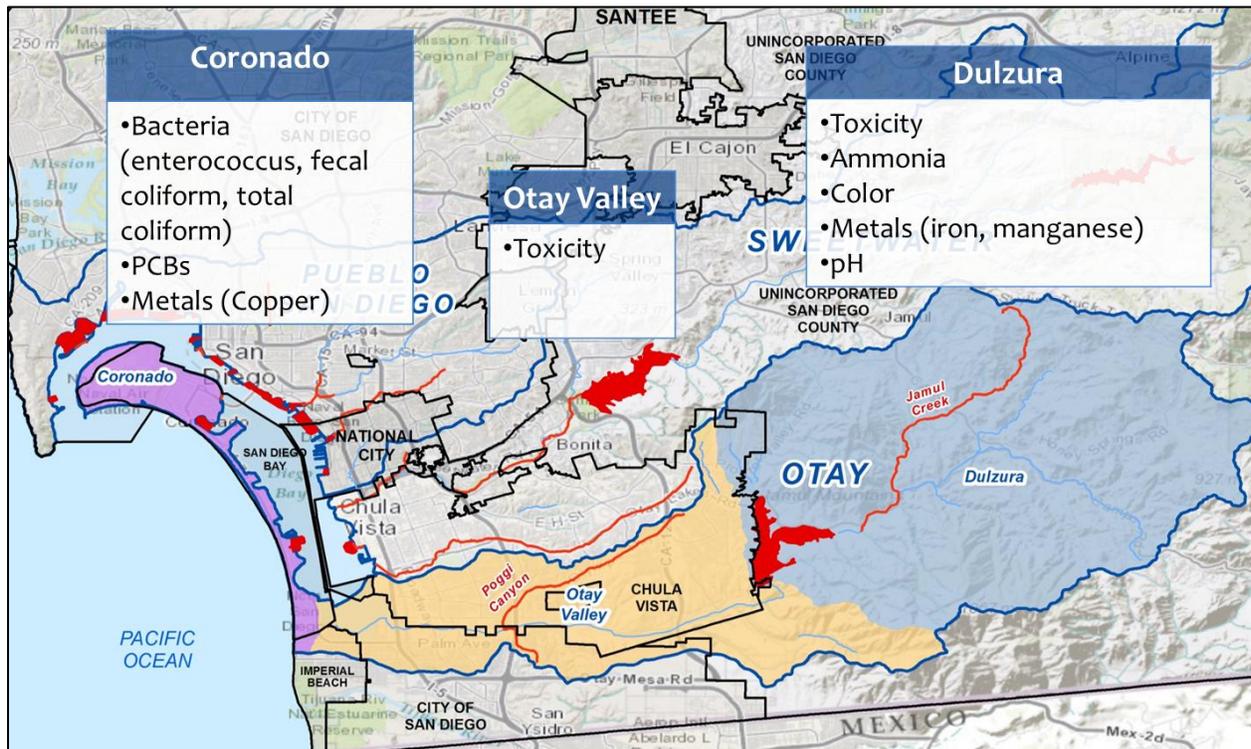


Table 1-2
2010 303(d) List for the Coronado Hydrologic Sub-Area

303(d) List Impairment of Stated Beneficial Use and Location	Potential Pollutant
Impairment of REC-1 at the Pacific Ocean Shoreline, Coronado HA, at Silver Strand (north end, Oceanside)	<i>Enterococcus</i>
Impairment of REC-1 at the Pacific Ocean Shoreline, Imperial Beach Pier	Total and fecal coliform
Impairment of COMM at the Pacific Ocean Shoreline, Imperial Beach Pier	Polychlorinated biphenyls (PCBs)
Impairment of REC-1 at the Pacific Ocean Shoreline, Otay Valley HA, at Carnation Ave and Camp Surf Jetty	Bacteria
Impairment of EST at the San Diego Bay Shoreline, at Coronado Cays	Copper
Impairment of EST at the San Diego Bay Shoreline, at Glorietta Bay	Copper
Impairment of REC-1 and SHELL at the San Diego Bay Shoreline, Tidelands Park	Bacteria
Preservation of special habitat at the San Diego County Wildlife Refuge-South San Diego Bay Unit	Special habitat

Bold corresponds to 303(d) listings within the City of Coronado or receiving discharges from the City's MS4.
Note: Beneficial use categories are: COMM = commercial and sport fishing; REC-1 = contact water recreation; SHELL = shellfish harvesting; and EST = estuarine habitat.

Figure 1-6
Impaired Waters in the Otay River Hydrologic Sub-Area





The City has approximately 28 miles of coastline and is bordered by the Pacific Ocean to the west and south and the San Diego Bay to the north and east. These receiving waters surrounding Coronado have certain areas that are characterized as Environmentally Sensitive Areas (ESAs). These ESAs have a lower threshold for withstanding pollutant loading either because of existing pollution problems or because of the sensitivity of the environment.

Environmentally Sensitive Areas are:

1. **Clean Water Act Section 303(d) Impaired Water Bodies.** 303(d) Impaired Water Bodies are those in which the State Water Board has recommended to the EPA and which the EPA has determined do not meet water quality standards, even after point sources of pollution have installed the minimum required levels of pollution control technology.

Coronado's waters off Glorietta Bay and Coronado Cays have been listed as 303(d) impaired water bodies for dissolved copper and San Diego Bay is listed for Polychlorinated biphenyls (PCBs) (2006). San Diego Bay at Tidelands Park (Port of San Diego) is listed for bacterial indicators.

2. **Areas of Special Biological Significance.** Areas of Special Biological Significance designated by the State Water Board and San Diego Water Board; the San Diego Basin Plan currently does not list any areas of Special Biological Significance in Otay HU which includes the Coronado HSA (910.10).
3. **State Water Quality Protected Areas.** As of October 2012, the State Water Board has not designated State Water Quality Protected Areas other than those designated as State Water Quality Protected Areas - Areas of Special Biological Significance.
4. **Water Bodies Designated with RARE Beneficial Use.** The RARE beneficial use includes Rare, Threatened, or Endangered Species Beneficial Use Water Bodies. The RARE beneficial use status applies to habitats necessary, at least in part, for the survival and successful maintenance of plant and animal species established under state or federal law as rare, threatened, or endangered. San Diego Bay and the Pacific Ocean have been designated as RARE Beneficial Use Water Bodies.
5. **Preserve Areas or Equivalent under the Natural Communities Conservation Program.** Not applicable to the City of Coronado.
6. **Other equivalent ESAs identified in the Coronado HSA.** An area south of the Coronado Cays is a wildlife preservation zone for the purposes of protecting and preserving the environmental resources in this area. This property is federally-owned and a military property. The City has no jurisdiction over this property.



1.2.1.1 Water Quality Sensitive Area (WQSA) Definition

The ESAs within the City, which include 303(d) listed water bodies, RARE water bodies and City designated sensitive areas to protect water quality. The City has designated the first 200 feet from the ESA as the WQSA as a tool to identify parcels and potential sources that are located just upstream of the ESA and to allow for verification of potential impacts from storm water runoff. The identification of the WQSA allows planners and storm water personnel to prioritize the review of projects and other programs designed to improve water quality. The City's WQSA map is provided in Figure 1-7. Additional, more detailed figure are also found in JRMP Section 4 – Development Planning.

**Figure 1-7
Coronado WQSA and 303(d) Listed Water Bodies**



1.3 Purpose and Objectives

The City prepared this JRMP document pursuant to the Regional Water Board, Order R9-2013-0001, NPDES No. CAS0109266, Waste Discharge Requirements for Discharges of Urban Runoff from the MS4s draining watersheds of the County, the Incorporated Cities of San Diego County, the San Diego Unified Port District, and the San Diego County Regional Airport Authority, referred to in this document as the Permit.



The purpose of the JRMP is for the City to implement a number of jurisdictional runoff management programs to control the contribution of pollutants to and the discharges from the MS4 within its jurisdiction. The goal of the City’s jurisdictional runoff management programs is to implement strategies that effectively prohibit non-storm water discharges to the MS4 and reduce the discharge of pollutants in storm water to the MEP¹. This goal will be accomplished through implementing the JRMP in accordance with the strategies identified in the San Diego Bay WQIP and to meet additional City established storm water and runoff requirements in the Permit. The City’s list of jurisdictional strategies from the San Diego Bay WQIP (from Appendix I) is included in the Storm Water Standards Manual, Section 1-C. It will be updated in the JRMP as it is updated in the San Diego Bay WQIP. The City’s jurisdictional strategies are driven by the focused water quality condition to achieve and maintain swimmable waters by preventing and eliminating the discharge of bacteria at the source(s). See Section 1.3.2 for additional details.

Permit Requirement:	Provision F.2.a
Title:	Jurisdictional Runoff Management Programs Document Updates
Brief Description:	The City must update its JRMP document to incorporate all requirements of Permit Provision E – Jurisdictional Runoff Management Programs.
Permit Page Number:	114 of 127

The City must update its JRMP document, in accordance with Permit Provision F.2.a, to incorporate all the requirements of Permit Provision E – Jurisdictional Runoff Management Programs. In accordance with the Permit, updates are required to:

1. The City is encouraged to seek public and key stakeholder participation and comments, as early and often as possible during the process of developing updates to its JRMP document;
2. The City must update its JRMP document to incorporate the requirements of Permit Provision E concurrent with the submittal of the San Diego Bay WQIP. The City must correct any deficiencies in the JRMP document based on comments received from the San Diego Water Board in the updates submitted with the WQIP Annual Report;
3. The City must submit updates to its JRMP, with the supporting rationale for the modifications, either in the WQIP Annual Report [Permit Provision F.3.b.(3)], or as part of the Report of Waste Discharge due 180 days in advance of the expiration of the Permit or December 29, 2017 submitted by the Copermitees (Permit Provision F.5.b);

¹ MEP is set as the compliance standard in CWA Section 402(p)(3)(B)(iii).



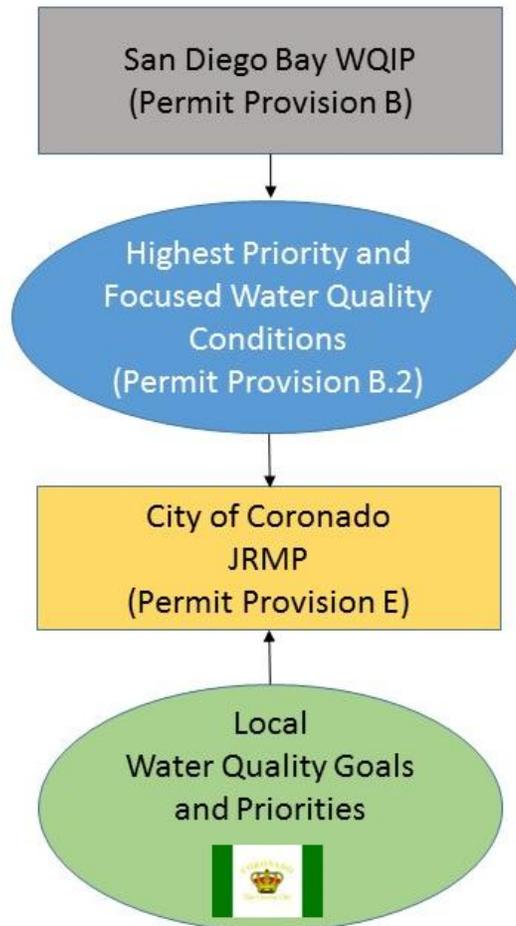
4. The City must revise proposed modifications to its JRMP as directed by the San Diego Water Board Executive Officer²; and
5. The updated JRMP document must be made available on the internet-based Regional Clearinghouse (Permit Provision F.4) at www.projectcleanwater.org developed by the Copermittees within 30 days of submitting the WQIP Annual Report.

In general, this document is a written account of the overall program to be conducted by the City to comply with JRMP requirements of the Permit from the date specified by the San Diego Water Board in the written notification of acceptance received from the San Diego Regional Board. However, all activities described in this document are subject to modification as the City determines necessary or adequate to comply with requirements of the Permit, or as may be clarified by the San Diego Water Board with the City based on interpretation, or minor modification to implementation strategies. The JRMP also includes program elements associated with highest or focused priority water quality conditions as established in the San Diego Bay WQIP. The relationship between the various Permit provisions, local water quality goals and objectives and the City's JRMP is shown in Figure 1-8.

² Per Permit Finding 35, "Executive Officer Delegation of Authority. The San Diego Water Board by prior resolution has delegated all matters that may legally be delegated to its Executive Officer to act on its behalf pursuant to CWC section 13223. Therefore, the Executive Officer is authorized to act on the San Diego Water Board's behalf on any matter within this Order unless such delegation is unlawful under CWC section 13223 or this Order explicitly states otherwise."



**Figure 1-8
Permit and Program Relationship**



1.3.1 Summary of Permit Requirements

Permit Requirement:	Provision B
Title:	Water Quality Improvement Plans
Brief Description:	This was developed as an adaptive planning and management process to identify the highest water quality conditions within a watershed through jurisdictional program strategies to improve water quality.
Permit Page Number:	17 of 127

The purpose of Provision B of the Permit is to develop WQIPs that guide the Copermittees' jurisdictional runoff management programs towards achieving the outcome of improved water quality in MS4 discharges and receiving waters. The goal of the WQIPs is to further CWA's



objective to protect, preserve, enhance, and restore the water quality and designated beneficial uses of waters of the state. The Permit is structured in such a way that this goal will be accomplished through an adaptive planning and management process that identifies the highest priority water quality conditions within a watershed and implements strategies through the jurisdictional runoff management programs to achieve improvements in the quality of discharges from the MS4s and in the receiving waters.

Permit Table B-1 lists the Responsible Copermittees for each WMA or HU, including San Diego Bay as summarized in Table 1-1.

Permit Requirement:	Provision E
Title:	Jurisdictional Runoff Management Programs
Brief Description:	This outlines the minimum required jurisdictional runoff management programs to be developed and implemented by the City to achieve the Permit goals and compliance.
Permit Page Number:	72 of 127

The purpose of the JRMP, per Section E of the Permit, is for the City to implement a program to control the contribution of pollutants to, and the discharges from, the MS4 within its jurisdiction. The goal of the jurisdictional runoff management programs is to implement strategies that effectively prohibit non-storm water discharges to the MS4 and reduce the discharge of pollutants in storm water to the MEP.

The implementation of the jurisdictional runoff management programs is described in the City's JRMP (this document) in accordance with the strategies identified in the San Diego Bay Water Quality Improvement Plan and the City's focus on strategies that align with its goals and priorities.

Provision B.3 of the Permit requires the Copermittees, including the City, to identify and develop specific water quality improvement goals and strategies to address the highest priority water quality conditions identified within a WMA. The water quality improvement goals and strategies must address the highest priority water quality conditions by effectively prohibiting non-storm water discharges to the MS4, reducing pollutants in storm water discharges from the MS4 to the MEP, and protecting the water quality standards of receiving waters.

The Permit directs the City to take appropriate actions to reduce discharge of pollutants and runoff during each of the three major phases of urban development: development planning, construction, and existing (or use) development. The City owns or operates the MS4, through which it discharges urban runoff and storm water into waters of the United States.



The City's JRMP contains the components listed in Table 1-3 as described in Provision E of the Permit and to comply with the Permit.

**Table 1-3
Permit Provisions Contained in the JRMP**

Permit Provision	Provision Number	General Description
Legal Authority Establishment and Enforcement	Provision E.1	The City must have adequate legal authority to control pollutant discharges into and from its MS4 through statute, ordinance, permit, contract, order, or similar means. Provision lists the minimum authority required
Illicit Discharge Detection and Elimination	Provision E.2	A program to actively detect and eliminate illicit discharges and improper disposal to the MS4
Development Planning	Provision E.3	A program implemented as part of the City's land use and planning authorities for all development projects to include best management practices (BMPs) for post-construction (land use) control of pollutants
Construction	Provision E.4	A program implemented to include BMPs for construction activities to control pollutants
Existing Development Management	Provision E.5	A program implemented to designate BMPs for specific existing development (land use) to control pollutants
Enforcement Response Plan	Provision E.6	Describes the approaches and options to enforce the City's legal authority to achieve compliance with Permit requirements
Public Education and Participation	Provision E.7	A program to promote and encourage the reduction of pollutant discharges to the MS4 and protect water quality
Fiscal Analysis	Provision E.8	A program to secure the resources necessary to meet Permit requirements

1.3.2 Monitoring and Assessment Program Requirements

The Permit includes extensive monitoring and assessment requirements found in Provision D. The purpose of this Permit provision is to require the City and Responsible Copermittees (as shown in Table 1-1) to monitor and assess the impact on the condition of receiving waters caused by discharges from the MS4 under wet weather and dry weather conditions. The goal of the monitoring and assessment program is to inform the City about the nexus between the health of receiving waters and the water quality condition of the discharges from the City's MS4.

1.3.2.1 Monitoring Programs

The overarching goal of the monitoring programs summarized below is to implement monitoring of the conditions of the receiving waters, discharges from the MS4, pollutant sources and/or stressors, and assessment the effectiveness of the water quality improvement strategies



implemented by the City per the San Diego Bay WQIP. The Permit includes multiple provisions for monitoring and assessment that are ultimately incorporated or linked by cross-referencing. The interpretation of the requirements is complicated, but as noted below, the City has obligations under Provisions B.4 and D for the watershed [San Diego Bay WQIP Monitoring and Assessment Plan (MAP)] and locally as part of the JRMP (Provision E.2). As shown in Table 1-3 several of the watershed level monitoring programs are implemented by the City, as part of the San Diego Bay WQIP, with the Copermittees in the watershed as detailed in the MAP included in the San Diego Bay WQIP document.

In addition, the Permit includes illicit discharge detection and elimination requirements in Permit Provision E.2 that are to be solely implemented by the City. The City must implement a program to actively detect and eliminate illicit discharges and improper disposal into the MS4, or otherwise require the discharger to apply for and obtain a separate NPDES permit. The illicit discharge detection and elimination program is included in this JRMP.

Permit Requirement:	Provision B.4
Title:	Water Quality Improvement Monitoring and Assessment Program
Brief Description:	This outlines the minimum required monitoring and assessment requirements mainly implemented at the watershed level as part of the San Diego Bay WQIP. It incorporates Provision D by reference and TMDLs (currently not applicable to Coronado).
Permit Page Number:	30 of 127

Permit Requirement:	Provision D
Title:	Monitoring and Assessment Program Requirements
Brief Description:	This outlines the minimum required monitoring and assessment requirements mainly implemented at the watershed level.
Permit Page Number:	38 of 127

Permit Requirement:	Provision E.2
Title:	Jurisdictional Runoff Management Programs – Illicit Discharge Detection and Elimination
Brief Description:	This outlines the minimum program requirements for the illicit discharge and detection of improper disposal or discharge into the MS4.
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The various monitoring programs implemented by the City and the City with the San Diego Bay WQIP Responsible Copermittees are shown in Table 1-4 and summarized in the Section below.



**Table 1-4
Permit Required Monitoring Programs³**

Monitoring Program	Permit Provision	Description	Implemented by
Water Quality Improvement Monitoring and Assessment Program	B.4.	Monitoring and assessment at the watershed level as part of the San Diego Bay WQIP	San Diego Bay WQIP Copermittees
Receiving Water Monitoring	D.1	Characterizes trends in the chemical, physical, and biological conditions of the receiving water to determine whether beneficial uses are protected, maintained, or enhanced. Includes participation in the Southern California Bight program and other related programs⁴	San Diego Bay WQIP Copermittees
1. Long-Term Receiving Water Monitoring Stations	D.1.b	In the San Diego Bay Watershed, the designated dry and wet weather long-term receiving water monitoring station is Sweetwater River. This site has been monitored historically since 2001	San Diego Bay WQIP Copermittees
2. Dry Weather Receiving Water Monitoring	D.1.c	Includes monitoring for chemistry, bacteria, toxicity, visual observations, field observations, hydromodification and bioassessment	San Diego Bay WQIP Copermittees
3. Wet Weather Receiving Water Monitoring	D.1.d	Includes monitoring for chemistry, bacteria, toxicity, field measurements and trash assessment	San Diego Bay WQIP Copermittees
MS4 Outfall Discharge Monitoring	D.2	Evaluates the potential contribution from MS4 discharges to receiving water quality	The City of Coronado as noted below
1. Dry Weather MS4 Outfall Discharge Monitoring	D.2.b	Includes seven City major outfalls inspected to identify and prioritize persistent flows. Monitoring is conducted for various analytical constituents for persistent flowing outfalls	City of Coronado

³ Transitional Monitoring Programs implemented during the period between the Permit effective date (June 27, 2013) and the implementation of this JRMP are not included in this section.

⁴ See latest version of the San Diego Bay MAP for details.



Monitoring Program	Permit Provision	Description	Implemented by
2. Wet Weather MS4 Outfall Discharge Monitoring	D.2.c	Includes one City location with two outfalls located at North Beach. Monitoring for various field and analytical constituents, including toxicity testing	City of Coronado through a contract with a specialized consultant either individually or in collaboration with the San Diego Bay WQIP Copermittees
3. Otay River HU – Swimmable Waters		Monitoring conducted to assess swimmable waters in the Otay River Watershed, Coronado HSA for bacterial indicators. Supports Focused Priority Water Quality Condition in the San Diego Bay WQIP and a City of Coronado goal. Includes outfall and receiving water monitoring during dry and wet weather at various locations in the Coronado HSA	City of Coronado through a contract with a specialized consultant either individually and/or with the City of Imperial Beach and the Port of San Diego
Special Studies	D.3	Various special studies related to water quality conditions such as bacteria, trash and metals⁵ TMDL monitoring is included in this section⁶	The City of Coronado through a contract and cost share program with regional Copermittees or applicable parties (TMDL)
Illicit Discharge Detection and Elimination	E.2	As part of the MS4 Outfall Discharge Monitoring Program and the implementation of various jurisdictional programs (e.g., inspections, complaint response), it aims to investigate and eliminate prohibited and illicit discharges to the MS4	The City of Coronado

⁵ See latest version of the San Diego Bay MAP for details.

⁶ The City of Coronado is not part of any TMDL implementation plan in the San Diego Bay WMA.



1.3.2.2 Integrated Assessment Requirements

Permit Requirement:	Provision D.4
Title:	Assessment Requirements
Brief Description:	The City must evaluate the data collected as part of its monitoring programs (D.1, D.2 and D.3) and information collected during the implementation of the jurisdictional runoff management programs (Provision E), to assess progress of the water quality improvement strategies in the San Diego Bay WQIP.
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The City must evaluate the data collected pursuant to Provisions D.1, D.2 and D.3, and information collected during the implementation of the jurisdictional runoff management programs required pursuant to Provision E, to assess the progress of the water quality improvement strategies in the WQIP toward achieving compliance with Provisions A.1.a, A.1.c and A.2.a.

The integrated assessment requirement in the Permit is a combination of all data collected under the monitoring and jurisdictional programs, the transitional programs and any of the programs already in place during the JRMP and WQIP development period. The integrated assessment will occur one time during the Municipal Permit term and incorporates all data collected and assessed during the Municipal Permit term. The integrated assessment is described in detail in MAP found in Section 10 of the San Diego Bay WQIP.

The integrated assessment is composed of the following components:

1. Monitoring Program Data
 - a. General Permit-Required Assessment
 - i. Receiving water assessment
 - ii. MS4 outfall discharge assessment
 - b. Highest and Focused Priority Condition Assessment
 - i. Swimmable waters, bacteria as a focused priority condition for Coronado
 - c. Special Studies and TMDLs Assessment
2. Jurisdictional Program Data
 - a. Focused Priority Condition programs
 - b. Base level programs
3. Transitional Program Data
 - a. Receiving Water Program
 - b. Hydromodification Management Plan monitoring program



JRMP Sections 3 and 9 provide more details of the jurisdictional program data collection and assessment related to the Monitoring Program and Transitional Program. In addition, data requirements and processes are included in Sections 7 - 9 of the San Diego Bay WQIP MAP.

1.3.2.3 Iterative and Adaptive Management Process

The Permit requires the City to implement an iterative and adaptive management process to periodically assess the various required programs (e.g., monitoring) and plans (e.g., WQIP, JRMP) to continuously improve them to achieve compliance with Permit Provisions listing prohibitions and limitations that include Discharge Prohibitions (Provision A.1) and Receiving Water Limitations (Provision A.2).

Permit Requirement:	Provision B.5
Title:	Iterative Approach and Adaptive Management Process
Brief Description:	The Copermittees in each Watershed Management Area must implement the iterative approach pursuant to Provision A.4 to adapt the Water Quality Improvement Plan, monitoring and assessment program, and jurisdictional runoff management programs to become more effective toward achieving compliance with Provisions A.1.a, A.1.c and A.2.a.
Permit Page Number:	30 of 127

Specifically, Provision A.1.a prohibits discharges from the MS4 “in a manner causing, or threatening to cause, a condition of pollution, contamination, or nuisance in receiving waters of the state” and Provision A.1.c subjects all discharges from the MS4 “to all waste discharge prohibitions in the Basin Plan”. Lastly, Provision A.2.a requires that “discharges from MS4s must not cause or contribute to the violation of water quality standards in any receiving waters”.

The iterative and adaptive management process described in JRMP Section 9, Program Management and Reporting (that include the JRMP Annual Report), allows for timely implementation of control measures (e.g., BMPs) and other actions put forth in the San Diego Bay WQIP and the City’s JRMP.

The Iterative and Adaptive Management Process is described in JRMP Section 9 and documented and reported in the WQIP Annual Reports.

1.3.3 Reporting

Reporting is broadly defined in the Permit and includes the development, submittal and implementation of a number of deliverables in the form of program plans as described in Provision F. The plans include the WQIP for San Diego Bay prepared by the San Diego Bay



Copermittees inclusive of the City’s JRMP and the BMP Design Manual outlining post-construction BMP requirements developed by all Copermittees. Provision F.2 specifies the periodic update of these documents or plans and Provision F.3 describes requirements for Progress Reporting such as Annual Reports and Regional Monitoring and Assessment Reports prepared individually by the City or in collaboration with all or a subset of the Copermittees.

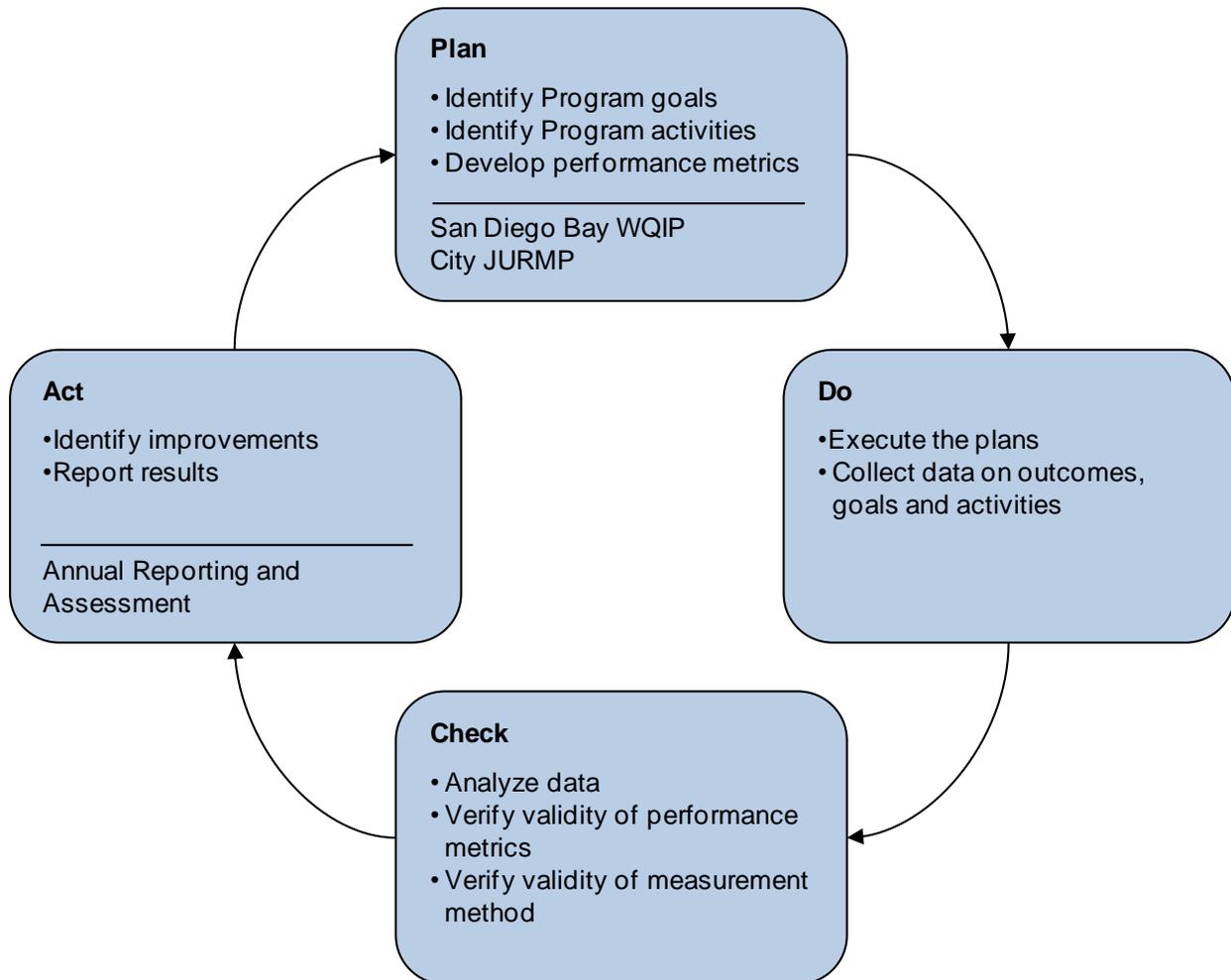
Permit Requirement:	Provision F
Title:	Reporting
Brief Description:	The goal of reporting is to communicate to the San Diego Water Board and the people of the State of California and the City of Coronado the implementation status of each jurisdictional runoff management program and compliance with the requirements of the Permit. This goal is accomplished through the submittal of specific deliverables to the San Diego Water Board by the City and the San Diego Bay Copermittees.
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The Permit also specifies the requirement for an internet-based Regional Clearinghouse (Provision F.4) available to the public to serves as the repository for documents and reports related to Permit implementation and compliance by the City and the Copermittees. The Regional Clearinghouse will be housed on the County of San Diego’s Project Clean Water website (www.projectcleanwater.org).

The relationship between program planning, monitoring, assessment and reporting is illustrated in Figure 1-9. This reflects the Permit and the program’s iterative and adaptive management approach to implementation – where the program is allowed to adapt to changing conditions based on data and information to improve water quality.



**Figure 1-9
Iterative and Adaptive Management Diagram**



1.4 Departmental Roles and Responsibilities

This section will identify and describe the departments and staff conducting runoff management activities. At a minimum, it will include the following:

- A description of all departments that conduct runoff management related activities, and their roles and responsibilities under the Permit;
- An up-to-date organizational chart specifying the aforementioned departments and key personnel.



1.4.1 City Government

The City of Coronado government structure includes elected officials and service departments as shown in the general organizational chart provided in Figure 1-10. The City has several departments that are directly involved in the implementation of the program described in the City's JRMP and compliance with the Permit as described below.

1.4.1.1 City Manager

The office of the City Manager provides the leadership and supervision that, in turn, implements the policies and decisions of the City Council; thereby ensuring the delivery of services to the community.

The City Manager's Office is committed to supporting and serving the City Council and community with energy and enthusiasm. They provide leadership and coordination for City Departments and employees to achieve community goals, including the implementation of the JRMP and compliance with the Permit.

1.4.1.2 City Attorney

The City Attorney provides legal counsel to the City Council and Mayor, City Manager, and staff. The City Attorney is committed to providing legal reviews and enforcement actions that support the implementation of the JRMP.

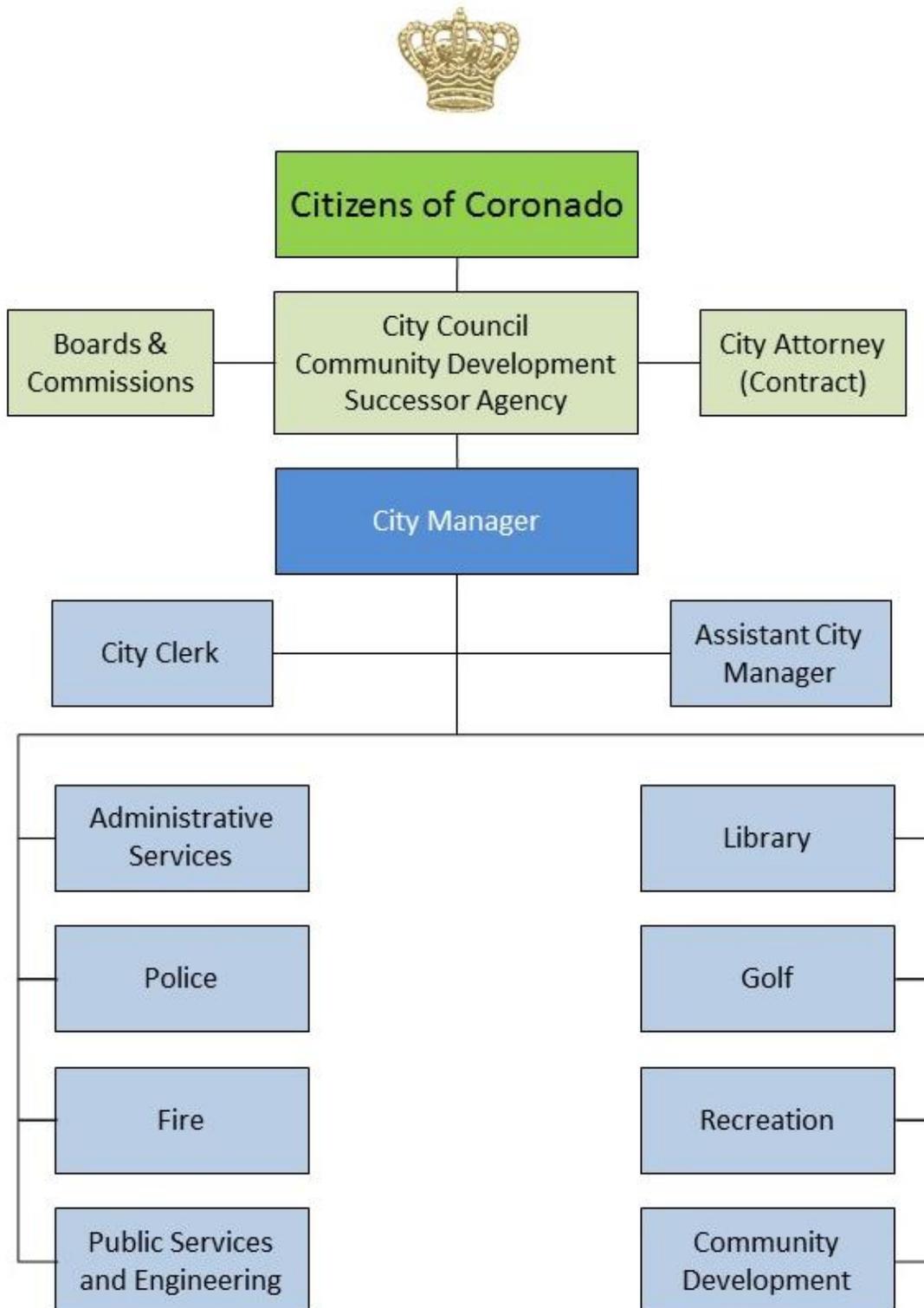
1.4.1.3 City Council and Mayor

The City Council, as elected representatives of the residents of Coronado, sets City policy, determines budget priorities, allocates City resources, and considers recommendations and appeals from a variety of advisory bodies. The City Council appoints the City Manager to manage the City and the City Attorney to provide legal advice and ensure compliance with local, State and Federal law. The City Council meets the first and third Tuesday of each month, and may hold additional special meetings as required. Additionally, each Councilmember represents the City on numerous regional boards and organizations, as well as acting as liaisons to Council advisory committees.

The City Council provides the overall vision and support for the various programs implemented as part of the JRMP.



Figure 1-10
City of Coronado - General Organizational Chart





1.4.1.4 Boards, Commissions and Committees

The City has a number of volunteer or staff committees that act as advisory to the City Council, including, among others, the following, which may be relevant to this JRMP under unique circumstance: Design Review Commission, and Planning Commission. The City Clerk keeps a current list of Citizen Advisory Committees, their vacancies, names of committee members, and the regular meeting dates of the committees.

1.4.2 City Services

The departments listed are involved in key elements of JRMP development and implementation, and play a role in Permit compliance. An overview of each department is provided in this section.

1.4.2.1 Public Services and Engineering

The Public Services and Engineering has two components: Public Services providing the services described in Section 1.4.2.1.1 and Engineering with various services as described in Section 1.4.2.1.2.

Public Services

The Public Services Department is committed to maintaining and enhancing the City's physical infrastructure and to providing the highest level of maintenance to the City's beaches, parks, facilities, utilities, and equipment and vehicle fleet in the most cost effective manner.

Public Services is responsible for a wide range of services including street, parks and beach maintenance, storm water program management, sewer system operations, maintenance and repair, graffiti removal on public property, parkway tree trimming, and the solid waste program, including the household hazardous waste program, and trash and recycling collection.

The following is a listing of the services provided by the Department:

- Storm Water Program Management and Implementation
- Beach Maintenance
- Facilities Maintenance – maintain city buildings and other property
- Fleet Maintenance – service and maintain city's vehicle and equipment fleet
- Streets and Public Rights-of-Way Maintenance
- Street Sweeping
- Commercial Area Sidewalk Cleaning
- Parks Maintenance
- Wastewater Operations
- Storm Water Operations
- Solid Waste/Recycling Collection
- Household Hazardous Waste Collection Facility



Project Development staff provides the planning, design, financial, contractual and construction management services necessary for development of the City's major capital improvement projects.

The Public Services Department is the City's leader in the development, management and implementation of the JRMP and acts as the liaison with the San Diego Water Board, the watershed's Copermittees, and the general public. Public Services provides various communities within the City (i.e. businesses, residents, visitors) with relevant information and educational materials related to runoff management programs. In addition, Storm Water staff within the Public Services Department has the knowledge to provide training and support to other City departments related compliance to the JRMP and Permit. The Storm Water Program provides education and training across the City's departments to enable a better understanding of the impact of specific activities within municipal services on the quality of the watershed, water quality, runoff, and Permit compliance.

The Public Services and Engineering Department is the primary department involved in educating the public on general storm water compliance. Public Services staff issue a variety of enforcement actions, including Notices of Violation. The enforcement program highlights voluntary non-judicial compliance with an emphasis on public awareness of governmental regulatory provisions. Higher level enforcement actions are managed through the City Attorney's office.

Engineering

Engineering is dedicated to providing engineering management, planning, design, construction, and repairs of the City's facilities and infrastructure, including buildings, parks, streets and utilities systems.

Engineering is responsible for management of a variety of programs, including Capital Improvement Projects (CIPs), as follows:

General Engineering Services – Provide right-of-way and encroachment permits, maintain all parcel and subdivision maps, record of surveys. Plan holder for all street, sewer, storm drain, facilities and miscellaneous improvements.

Traffic Engineering – Provide objective studies of all traffic safety issues based on traffic warrants, traffic manuals and other applicable publications.

Street Maintenance and Improvement Program – Provide for the planning and design of major repair and maintenance projects of the 40 miles that comprise the public street system.

Storm Drainage Improvement Program – Provide for major repair and upgrading of the City storm drainage system while ensuring compliance with the NPDES regulations.



Wastewater Utility Improvement Program – Provide for the major repairs and improvements to the sanitary sewer system which consists of 45 miles of sewer mains, fifteen pump stations and the Transbay pipeline.

1.4.2.2 Community Development

The Department is committed to providing planning and building services to the public. The department provides staff support to the Planning Commission, Design Review Commission, and Historic Resource Commission.

The Community Development Department is responsible for management of a variety of programs and activities including:

1. General Plan, Local Coastal Program, and Zoning Ordinance amendments;
2. Processing applications for Historic Designation, Historic Alteration Permits and Mills Act agreements;
3. Processing of applications for Special Use Permits, Variances, Coastal Permits, and Parking Plans;
4. Processing of applications for Subdivision Maps, Lot Line Adjustments, and Lot Consolidations;
5. Processing of applications for Design Review for Commercial and Multi-Family development and signs;
6. Environmental review of projects in accordance with the California Environmental Quality Act (CEQA);
7. Building construction plan check, permit issuance, and inspections;
8. Zoning and Building Code Enforcement;
9. Public information including planning and building records.

1.4.2.3 Public Safety

The Public Safety Department is composed of Fire Services and Police Services.

Fire Services

The Coronado Fire Services is committed to fire prevention and to utilizing resources efficiently and effectively to protect life and minimize property damage; to provide emergency medical services including patient transportation; and to prepare the community, through plans and education, for natural disasters.



Fire Services also oversees the beach lifeguard service responsible for posting the City's beaches in the event of a general advisory condition or beach closure due to poor or contaminated water quality.

The Department also provides classes, demonstrations, public safety education, and disaster preparedness programs. The Fire Department implements the Emergency Fire Fighting BMPs within the City of Coronado as described in the Permit and in this JRMP.

Police Services

Coronado Police Services is responsible for enforcing the provisions of the Coronado Municipal Code, including Title 61, as well as State and Federal laws. Officers on patrol notify the Public Services Department of illegal discharges into the public rights-of-way, tow abandoned vehicles, which could be a source of potential pollutants, and enforce litter regulations. Police Services responds to requests for assistance by issuing a citation in the event that a violator refuses to comply with storm water regulations.

1.4.3 Other Services

The remaining City services include Administrative Services, which offers support to other departments and does not directly implement or conduct activities related to the JRMP; and the Library, providing information resources to meet the informational, recreational, and cultural needs of the community and to actively promote reading, life-long learning, and the pursuit of knowledge.

City staff within these departments is aware and informed on Storm Water Program activities in general and has the knowledge to provide referrals and direct citizens or businesses to the appropriate department when contacted regarding storm water and runoff issues.

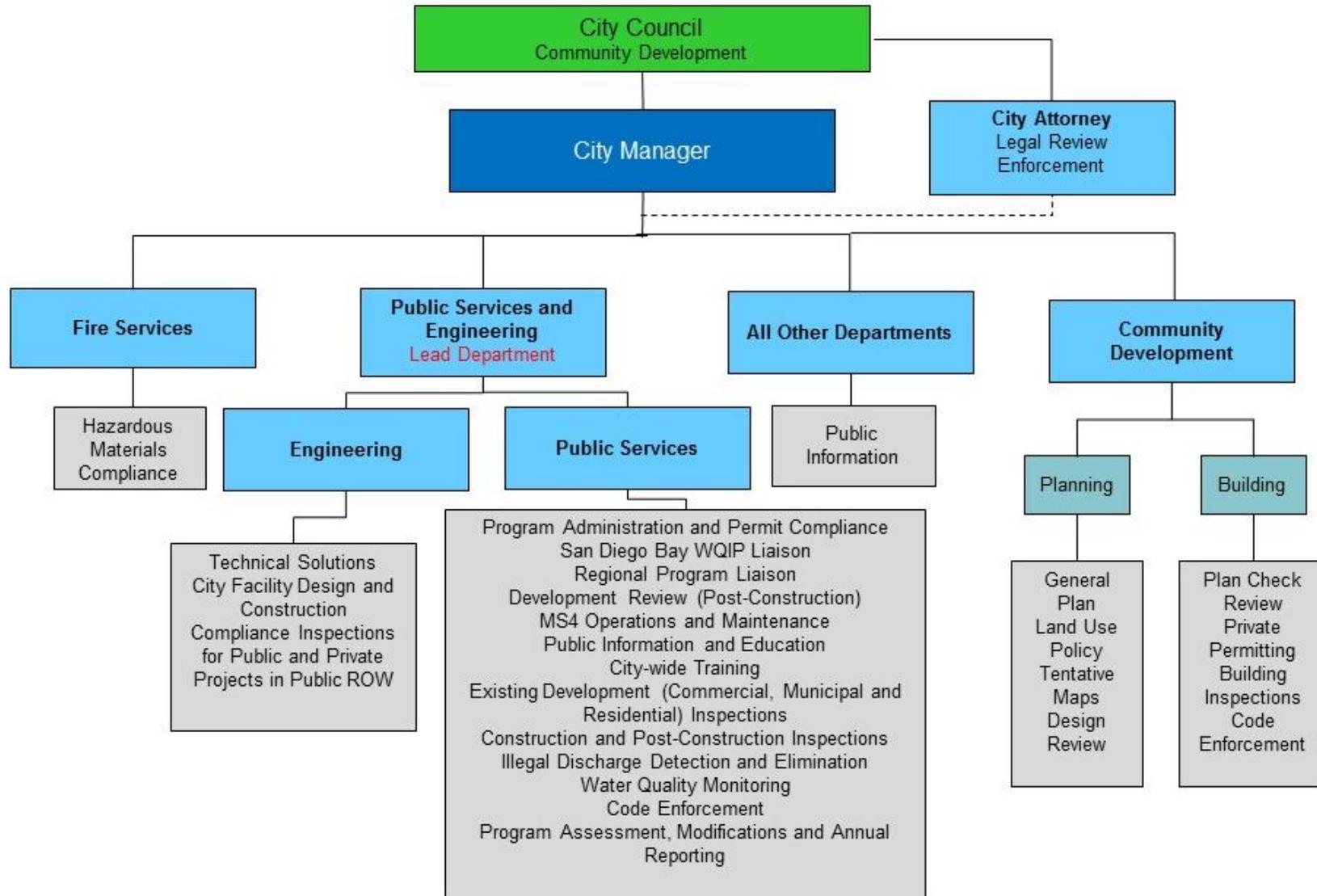
1.5 JRMP Administration

The organizational chart provided in Figure 1-11 provides an overview of the key functions performed by various departments involved in Permit and JRMP implementation throughout the City, with the Public Services and Engineering Department as the Lead Department.

The Public Services and Engineering Department is composed of several divisions that have primary and secondary functions related to Permit and JRMP implementation activities. These functions are presented in the Department's organizational chart presented in Figure 1-12.

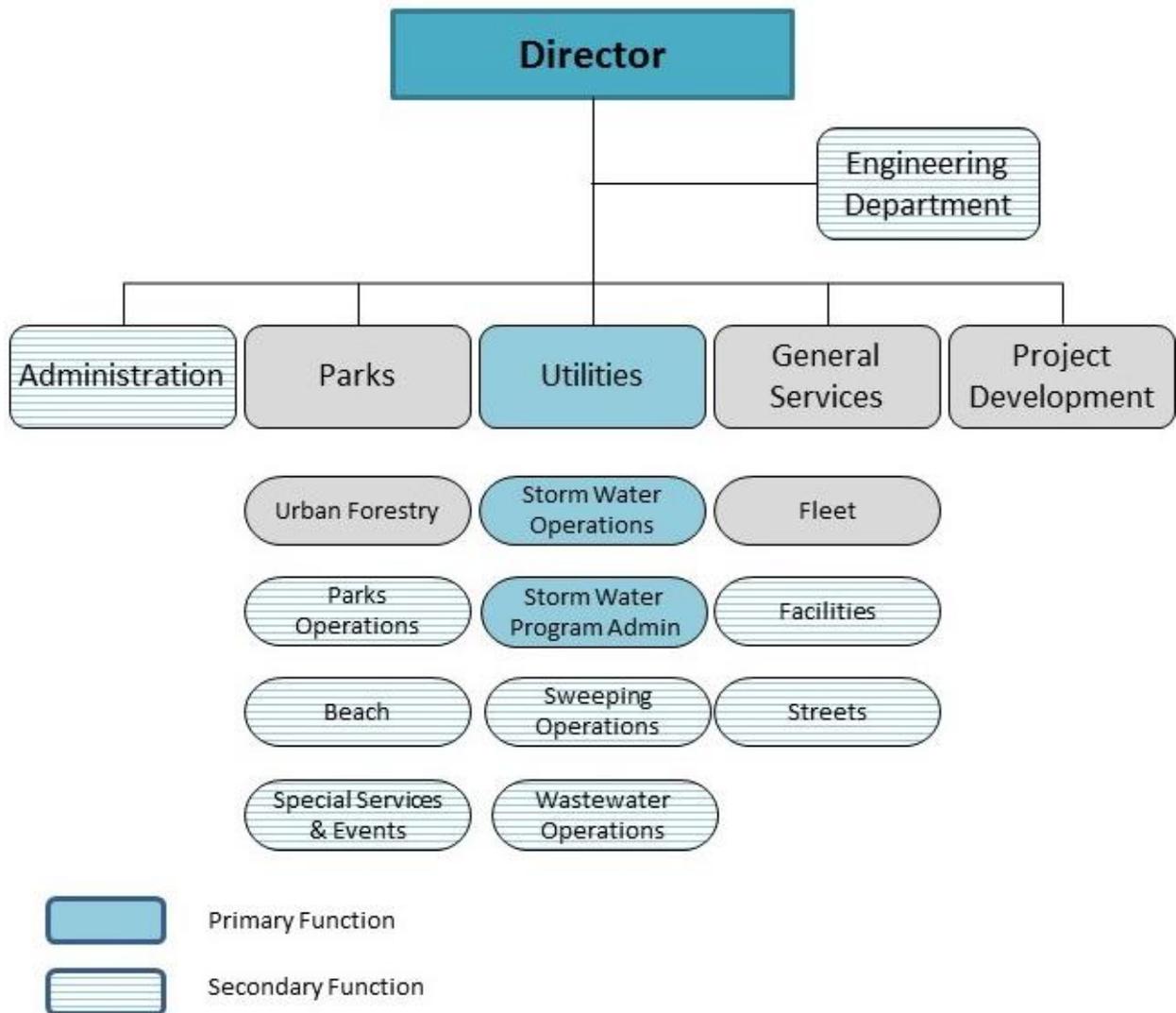


Figure 1-11
Storm Water Program Key Function Overview Organizational Chart





**Figure 1-12
Public Services and Engineering Department Organizational Chart**





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2.1 Legal Authority Establishment and Enforcement Requirement

Permit Requirement:	Provision E.1
Title:	Legal Authority Establishment and Enforcement
Brief Description:	The City must establish, maintain, and enforce adequate legal authority within its jurisdiction to control pollutant discharges into and from its MS4 through statute, ordinance, permit, contract, order, or similar means.
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Permit Provision E.1 requires that the City establish, maintain, and enforce adequate legal authority within its jurisdiction to control pollutant discharges into and from its Municipal Separate Storm Sewer Systems (MS4) through statute, ordinance, permit, contract, order, or similar means.

The minimum legal authority must, according to Permit Provision E.1.a., authorize the City to:

1. Prohibit and eliminate all illicit discharges and illicit connections to its MS4;
2. 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;
3. Control the discharge of spills, dumping, or disposal of materials other than storm water into its MS4;
4. Control, through interagency agreements among Copermittees, the contribution of pollutants from one portion of the MS4 to another portion of the MS4;
5. 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 City’s jurisdiction;
6. Require compliance with conditions in its statutes, ordinances, permits, contracts, orders, or similar means to hold dischargers to its MS4 accountable for their contributions of pollutants and flows;



7. Require the use of Best Management Practices (BMPs) to prevent or reduce the discharge of pollutants in storm water from its MS4 to the Maximum Extent Practicable (MEP);
8. 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;
9. Utilize enforcement mechanisms to require compliance with its statutes, ordinances, permits, contracts, orders, or similar means; and
10. 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 the Permit, including the prohibition of illicit discharges and connections to its MS4; the City 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.

2.2 City of Coronado Legal Authority

Permit Requirement:	Provision E.1.b
Title:	Legal Authority Establishment and Enforcement Certification
Brief Description:	The City must submit a certified statement that it has obtained and will maintain full legal authority to implement and enforce the requirements of the Permit.
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Permit Provision E.1.b. requires that with the first San Diego Bay Water Quality Improvement Plan (WQIP) Annual Report, the City submit a statement certified by its Principal Executive Officer, Ranking Elected Official, or Duly Authorized Representative that it has taken the necessary steps to obtain and maintain full legal authority within its jurisdiction to implement and enforce each of the requirements contained in the Permit.

The City has verified that it meets the minimum Permit requirements outlined for legal authority and enforcement. The certification statement is provided in the Storm Water Standards Manual, Section 2-C.

The Coronado Municipal Code has several sections that describe requirements for storm water and runoff management, and enforcement measures. The most relevant sections of the City's Municipal Code as it applies to enforcement of the JRMP and the Permit are described below.

Code Adoption (Chapter 1.02). Describes the general process to adopt, review and repeal ordinances. Describes the duties of officers and employees of the City.



Enforcement (Chapters 1.08 and 61.12). Defines penalties, fines, nuisance, and citizen complaint procedures.

Code Enforcement Administrative Fines (Chapter 1.10). Provides definitions for the terms enforcement officer, responsible person, hearing officer and violations. Defines administrative citation procedures, appeal procedures, and hearing procedures.

Appeals (Chapter 1.12). Provides the procedures for appeals of final determinations of City departments, including an administrative hearing officer.

Storm Water and Runoff Management and Control (Chapter 61.04). Provides the purpose and intent, defines terminology and general provisions.

Discharge Regulations and Requirements (Chapter 61.08). Defines prohibited discharges and BMPs for each activity or facility by type.

The City's ordinance as noted above can be found in the Storm Water Standards Manual in Section 2-A and the City's website.

The City may also implement a variety of other legal documents (e.g., contract) to require and enforce requirements to comply with the Permit.

2.3 Enforcement Response Plan

Permit Requirement:	Provision E.6
Title:	Enforcement Response Plan
Brief Description:	The City must develop and implement an Enforcement Response Plan as part of its jurisdictional runoff management program document.
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The Permit requires that the City develop and implement an Enforcement Response Plan (ERP) as part of its JRMP document that describes the applicable approaches and options to enforce its legal authority (established per Permit Provision E.1) to achieve compliance with the requirements of the Permit.

The City's ERP is provided in Section 2-B of the Storm Water Standards Manual and may be updated from time to time, as needed.

2.4 Jurisdictional Strategies – San Diego Bay WQIP

The San Diego Bay WQIP describes the role and purpose of jurisdictional strategies in detail and may be consulted for a more comprehensive understanding of the selection of high priority



or focused water quality conditions in the San Diego Bay watersheds. In summary, the San Diego Bay WQIP identified for the Coronado Hydrologic Sub-Area (HSA) No. 910.1 a focused priority condition or goal of swimmable waters (beaches) with bacteria as the targeted pollutant to be addressed in order to achieve the goal. The City developed a list of jurisdictional strategies as part of the San Diego Bay WQIP that will support the goal of swimmable waters. In Section 4, Figure 4-1 depicts the Coronado HSA in relationship to the City's jurisdictional boundary.

Activities and programs that are not directly linked to the San Diego Bay WQIP and its jurisdictional strategies are only subject to the City's core elements in accordance with the Permit.

2.4.1 Implementation of Jurisdictional Strategies

Coronado's jurisdictional strategies include activities associated with compliance and enforcement that specifically target bacteria sources that may impact the goal of swimmable water. The full table of jurisdictional strategies is reproduced from the San Diego Bay WQIP and presented in Appendix 4-A. In summary, the two jurisdictional strategies related to compliance and enforcement are:

1. Implement escalating enforcement responses to compel compliance with statutes, ordinances, permits, contracts, orders and other requirements for illicit discharge detection and elimination, development planning, construction management, and existing development in the ERP
 - a. Increase enforcement of over-irrigation
 - b. Focus locally on enforcement of water-using mobile businesses
2. Enforce minimum BMPs for existing residential and commercial development. Includes power washing at non-residential sites targeting focused priority conditions (bacteria sources).

City staff will implement these jurisdictional strategies in the conduct of routine storm water activities (e.g., commercial facility inspections, residential "patrols").

2.5 Annual Reporting

A comprehensive annual reporting plan to meet the requirements in the Permit is included in Section 9 of this JRMP.

The Permit requires minimum annual reporting requirements found in Permit Appendix D-3, the Jurisdictional Runoff Management Program Annual Report Form (Annual Report Form found in the Storm Water Standards Manual, Section 8). The Annual Report Form includes the following items for each of the JRMP components listed for Legal Authority:

Answers (yes or no) to the following questions:



1. Has the City established adequate legal authority within its jurisdiction to control pollutant discharges into and from the MS4 that complies with Order No. R9-2013-0001?
2. A Principal Executive Officer, Ranking Elected Official, or Duly Authorized Representative has certified that the City obtained and maintains adequate legal authority?

In addition, each of the following JRMP components must include annual statistics on violations and enforcement actions reporting in the Annual Report Form as shown in Table 2-1.

Table 2-1
Enforcement Reporting Requirements by JRMP Component

JRMP Component	Number of Violations	Number of Enforcement Actions	Number of Escalated Enforcement Actions
Illicit Discharge Detection and Elimination (Sect. 2)	Not required	Required	Required
Development Planning (Sect. 4)	Not required	Required	Required
Construction Management (Sect. 5)	Required	Required	Required
Existing Development (Sect. 6)	Required	Required	Required

The details on the reporting requirements are provided in each JRMP component section and as noted above in Section 9. The certification statement for legal authority is required with the first submittal of the JRMP/San Diego Bay WQIP Annual Report due in 2016 and will be included in Storm Water Standards Manual Section 2-C.



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3.1 Illicit Discharge Detection and Elimination Program Requirements

Permit Requirement:	Provision E.2
Title:	Illicit Discharge Detection and Elimination Program
Brief Description:	The City must implement a program to actively detect and eliminate illicit discharges and improper disposal into the MS4.
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Permit Provision E.2 requires that the City implement a program to actively detect and eliminate illicit discharges and improper disposal into the Municipal Separate Storm Sewer Systems (MS4), or otherwise require the discharger to apply for and obtain a separate NPDES permit.

The Permit also states that the Illicit Discharge Detection and Elimination (IDDE) Program must be implemented in accordance with the strategies in the San Diego Bay Water Quality Improvement Plan (WQIP). The jurisdictional strategies for the IDDE Program are provided in Section 3.2.

The 2015 San Diego Bay WQIP includes Swimmable Waters as a Focused Priority Water Quality Condition for the City of Coronado primarily accomplished through control of sources of bacteria. The City’s goal, as reflected in this JRMP, for the IDDE Program (and other programs) is to implement measures that align with the Swimmable Waters Focused Priority Water Quality Condition.

The City must, where feasible and priorities and resources allow, reduce or eliminate non-storm water discharges listed under Permit Provisions E.2.a.(1)-(4) and shown in Table 3-1, into its MS4, unless a non-storm water discharge is identified as a discharge authorized by a separate NPDES permit [Permit Provision E.2.a.(7)].

The City developed and implemented an IDDE Program under previous municipal storm water permits and has been successful at reducing and controlling the number and type of illicit discharges to the MS4. The updates to the IDDE Program reflect the changes in the Permit and the City’s on-going efforts to comply with this requirement.

The Permit lists the non-storm water discharge categories that the City needs to address as illicit discharges unless the discharge is authorized by a separate NPDES permit. These categories are covered in detail in Section 3.3.



3.2 Jurisdictional Strategies – San Diego Bay WQIP

The San Diego Bay WQIP describes the role and purpose of jurisdictional strategies in detail and may be consulted for a more comprehensive understanding of the selection of high priority or focused water quality conditions in the San Diego Bay watersheds. In summary, the San Diego Bay WQIP identified for the Coronado Hydrologic Sub-Area (HSA) No. 910.1 a focused priority condition or goal of swimmable waters (beaches) with bacteria as the targeted pollutant to be addressed in order to achieve the goal. The City developed a list of jurisdictional strategies as part of the San Diego Bay WQIP that will support the goal of swimmable waters. In Section 4, Figure 4-1 depicts the Coronado HSA in relationship to the City’s jurisdictional boundary.

Activities and programs that are not directly linked to the San Diego Bay WQIP and its jurisdictional strategies are only subject to the City’s core elements in accordance with the Permit.

3.2.1 Implementation of Jurisdictional Strategies

Coronado’s jurisdictional strategies include activities associated with the IDDE program specifically targeting bacteria sources that can impact the goal of swimmable water (beaches). Illicit discharges have the potential to contribute bacteria through dumping, spills, illicit connections and similar accidental or prohibited activities. The City will verify the selection of Best Management Practices (BMPs) and require, if needed, additional or specific BMPs to reduce or eliminate the potential impact on receiving waters (beaches). The full table of jurisdictional strategies is reproduced from the San Diego Bay WQIP and presented in Storm Water Standards Manual, Section 1-C. In summary, the three jurisdictional strategies for the IDDE portion of the JRMP are:

1. Promote and maintain a website to encourage residents to report potential illicit discharges or other storm water violations
2. Conduct inspections in targeted areas designated as high priority for IDDEs. Follow-up with outreach and education and conduct enforcement, as needed.
3. Conduct “off-hours” inspections to identify and eliminate illicit discharges

3.3 Non-Storm Water Discharge Requirement and Categories

Permit Requirement:	Provision E.2.a
Title:	Non-Storm Water Discharges
Brief Description:	The City must address all non-storm water discharges as illicit discharges unless it is either identified as authorized by an NPDES permit, or address as required by the Permit
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Permit Provision E.2.a. defines seven categories of non-storm water and other discharges that need to be considered in the City's IDDE Program and for which implementation of strategies, BMPs and legal authority to enforce them is required.

Compliance with the Permit requires that the City include these non-storm water discharge categories in the ordinance, Coronado Municipal Code (CMC), and identify any additional categories.

Coronado Municipal Code

The Non-Storm Water Discharge implementation requirements and prohibitions of the IDDE Program are included in CMC 61.08.010 through 61.08.030.

If the City or San Diego Water Board identifies any category of non-storm water discharges listed under Permit Provisions E.2.a.(1)-(4), included in Table 3-1, as a source of pollutants to receiving waters, the category must be prohibited through ordinance, order, or similar means and addressed as an illicit discharge. Alternatively, the City may propose controls to be implemented for the category of non-storm water discharges as part of the San Diego Bay WQIP instead of prohibiting the category of non-storm water discharges. Once the controls are found acceptable by the San Diego Water Board as part of the WQIP, the City may require they be implemented by the discharger(s).

The City is also required to implement numerous activities to prevent, identify, prioritize, inspect or investigate, eliminate, and report illicit non-storm water discharges to the MS4. Sections 3.5 through 3.7 provide the required details for the City to meet these Permit requirements.

The City must also verify that certain categories of non-storm water discharges identified as a discharge authorized by a separate NPDES permit are reported to the San Diego Water Board as shown in Table 3-1.



**Table 3-1
 Non-Storm Water Discharge Categories**

Non-Storm Water Discharges – Considered Illicit Discharges	Permit Provision	Type	Implementation Strategy, As Applicable
Unless covered by NPDES Permit No. CAG919001 (Order No. R9-2007-0034) ^{1,2} for Discharges to surface waters other than San Diego Bay	E.2.a.(1)(1)	Uncontaminated pumped ground water	Permit by Water Board Ordinance ³ SOPs BMPs
	E.2.a.(1)(2)	Discharges from foundation drains ⁴	
	E.2.a.(1)(3)	Water from crawl space pumps	
	E.2.a.(1)(4)	Water from footing drains ⁴	
Unless covered by NPDES Permit No. CAG 679001 (Order No. R9-2010-0003) ⁵ for discharges of hydrostatic test water and potable water to surface water and storm drains or other conveyance systems	E.2.a.(2)	Water line flushing and water main breaks	Permit by Water Board Ordinance ³ SOPs
Only if the Copermittee or the San Diego Water Board identifies them as a source of pollutants to the receiving waters	E.2.a.(3)(a)	Diverted stream flows	Ordinance ³ SOPs BMPs
	E.2.a.(3)(b)	Rising ground water	
	E.2.a.(3)(c)	Uncontaminated ground water infiltration to MS4	
	E.2.a.(3)(d)	Springs	
	E.2.a.(3)(e)	Flows from riparian habitats and wetlands	
	E.2.a.(3)(f)	Potable water sources	
	E.2.a.(3)(g)	Foundation drains ⁶	
	E.2.a.(3)(h)	Footing drains ⁶	

¹ All listed Orders include subsequent Order, revisions or amendments as applicable.
http://www.waterboards.ca.gov/sandiego/water_issues/programs/regulatory/index.shtml

² This order applies to any person with temporary discharges from ground water extraction activities to waters of the San Diego Bay, tributaries thereto under tidal influence, and storm drains or other conveyances. Dischargers systems tributary thereto that do not cause, have the reasonable potential to cause, or contribute to an instream excursion above any applicable State or federal water quality objectives/criteria or cause acute or chronic toxicity in the receiving water.

³ CMC 61.08.020

⁴ This applies 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.

⁵ This order applies to water distributors (also called purveyors), water districts, municipalities, private entities, and other persons, that have been issued a water supply permit by the California Department of Public Health, or federal military installations, that discharge hydrostatic test water and/or potable water to surface waters within the San Diego Region and storm drains or other conveyance system tributary thereto (pursuant to Section 402 of the Clean Water Act) that do not cause, have a reasonable potential to cause, or contribute to instream excursion above any applicable State or Federal water quality objectives criteria or cause acute or chronic toxicity in the receiving water.

⁶ Applies 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 under unusual circumstances.



Non-Storm Water Discharges – Considered Illicit Discharges	Permit Provision	Type	Implementation Strategy, As Applicable
Controlled through statute, ordinance, permit, contract, order, or similar means	E.2.a.(4)(a)	Air conditioning condensation	Ordinance ³ SOPs BMPs
	E.2.a.(4)(b)	Individual residential vehicle washing	
	E.2.a.(4)(c)	Dechlorinated swimming pool discharges	
Firefighting discharges to the MS4, only if identified as a significant source of pollutants to the receiving waters	E.2.a.(5)(a)(i)	Non-emergency firefighting discharge – building suppression maintenance	Ordinance ³ BMPs
	E.2.a.(5)(a)(ii)	Non-emergency firefighting discharge – firefighting (i.e., controlled or practices blazes, training, maintenance)	SOPs BMPs
	E.2.a.(5)(b)	Emergency firefighting discharge	SOPs BMPs

3.4 Prohibited Non-Storm Water Discharges

The current Permit no longer allows several non-storm water discharge sources categories to be discharged to the MS4, which were previously allowed, and directs the City to implement a prohibition on their discharge to the MS4.

The categories of prohibited discharges, as noted in CMC Section 61.08.020 are:

1. Street wash water
2. Landscape irrigation flows
3. Irrigation water
4. Lawn watering flows

Categories 2 through 4 are generally considered “over-irrigation” practices and a source of pollutants to the MS4. These categories describe active irrigation and watering practices and are distinguished from potable water sources that includes accidental irrigation line or equipment breaks that are one-time incidents. Timely repair of irrigation system breaks are required and subject to enforcement if not addressed.

3.5 Non-Storm Water Discharge Implementation Strategies

Non-storm water discharge implementation strategies consist primarily of the following:

1. Permit – issued by the San Diego Water Board for the specific type of discharge
2. Ordinance – limitations or prohibitions are address in the City’s ordinance through enforcement
3. Standard Operating Procedures (SOPs) – the City implements staff procedures to identify, prevent and eliminate non-storm water discharges



4. Best Management Practices (BMPs) – the City identifies minimum BMPs to:
 - a. Reduce or eliminate pollutants in non-storm water discharges
 - b. Reduce or eliminate non-storm water discharges

3.5.1 San Diego Water Board Permitting

As noted in Table 3-1, numerous categories of non-storm water discharges are considered by the City as prohibited unless they are permitted by the San Diego Water Board or the State Water Board under an NPDES permit or equivalent.

The City implements this Permit requirement by identifying and referring these categories of discharges to the San Diego Water Board. At the City's discretion, these types of discharges may be permitted to go to the sanitary sewer. The City may also consider addressing these sources through the implementation of BMPs if they result in the elimination of the discharge to the MS4 and/or receiving waters.

3.5.2 Ordinance

The CMC, Section 61.08, includes non-storm water discharge requirements and prohibitions, per Permit Provision E.2.a.(6), for categories in Table 3-1 that are known or identified by the City to be a source of pollutants to receiving waters.

Coronado's municipal code also requires the implementation of the City's minimum BMPs as identified in the JRMP or specifically required by the City for each category and provides the authority to require BMPs or other actions from dischargers. The City's Storm Water Standards Manual may include additional BMPs for certain discharges, activities or operations.

3.5.3 Standard Operating Procedures (SOPs)

The City has developed and will update, as necessary, the SOPs that City staff implements to identify, prevent and eliminate non-storm water discharges. SOPs ensure that minimum BMPs are implemented when applicable and enforcement actions are undertaken when appropriate. The SOPs and the minimum BMPs described in the following section are subject to Best Professional Judgment (BPJ) based on field conditions, economical and practical implementation considerations, risk to public, and environmental health and safety.

SOPs are contained in the City's Storm Water Division SOP Manual and may also include other materials found in the City's Storm Water Standards Manual. Both are incorporated here by reference.

3.5.4 Best Management Practices (BMPs)

The City has identified minimum BMPs to be considered for each of the non-storm water discharge categories presented in Table 3-1. Minimum BMPs are applicable to the Maximum Extent Practicable (MEP) and BPJ standards. Alternative minimum BMPs may be considered by the City for a defined set of conditions as long as Permit requirements are met.



**Table 3-2
Minimum BMPs for Non-Storm Water Discharges**

Non-storm Water Discharge	Minimum BMPs
Uncontaminated pumped ground water 1. If minimal and not permitted by the San Diego Water Board	<ul style="list-style-type: none"> • Direct to sanitary sewer, if practical (during construction only) • Direct to landscaping or permeable area
Discharges from foundation drains 1. If minimal and not permitted by the San Diego Water Board 2. Applies only to systems designed and located at or below groundwater table 3. Extracting water during any part of the year, passively or actively 4. See below for additional category	<ul style="list-style-type: none"> • No new foundation drains allowed for new construction • Temporary drains to sanitary sewer allowed during construction only • Direct existing to sanitary sewer, if practical and approved by the City • Direct existing to landscaping or permeable area, if practical
Water from crawl space pumps 1. If minimal and not permitted by the San Diego Water Board	<ul style="list-style-type: none"> • No new pumps allowed for new construction • Temporary pumps to sanitary sewer allowed during construction only • Direct existing to sanitary sewer, if practical and approved by the City • Direct existing to landscaping or permeable area
Water from footing drains 1. If minimal and not permitted by the San Diego Water Board 2. Applies only to systems designed and located at or below groundwater table 3. See below for additional category Extracting water during any part of the year, passively or actively	<ul style="list-style-type: none"> • No new drains allowed for new construction • Temporary drains to sanitary sewer allowed during construction only • Direct existing to sanitary sewer, if practical • Direct existing to landscaping or permeable area
Water line flushing and water main breaks 1. If minimal and not permitted by the San Diego Water Board	<ul style="list-style-type: none"> • Coordinated with Public Services • Re-used water • Direct to pervious areas by using de-chlorinators
Diverted stream flows	Not present in Coronado
Rising ground water	<ul style="list-style-type: none"> • Direct to sanitary sewer, if practical and approved by the City • Direct to landscaping or pervious area
Uncontaminated ground water infiltration to MS4	<ul style="list-style-type: none"> • Identify sources/repair MS4 • Divert to permeable areas • Divert to sanitary sewer and approve by the City
Springs	Not present in Coronado
Flows from riparian habitats and wetlands	Not present in Coronado
Potable water sources	<ul style="list-style-type: none"> • Coordinated with Public Services • Re-used water (e.g., landscape irrigation) • Direct to pervious areas by using de-chlorinators



Non-storm Water Discharge	Minimum BMPs
Discharge from foundation drains 1. If system is designed to be located above the groundwater table at all times of the year 2. Applies only if system is only expected to discharge non-storm water under unusual circumstances 3. See above for additional category	<ul style="list-style-type: none"> • No new foundation drains allowed for new construction • Temporary drains to sanitary sewer allowed during construction only • Direct existing to sanitary sewer, if practical • Direct existing to landscaping or permeable area, if practical
Discharge from footing drains 1) If system is designed to be located above the groundwater table at all times of the year 2) Applies only if system is only expected to discharge non-storm water under unusual circumstances 3) See above for additional category	<ul style="list-style-type: none"> • No new drains allowed for new construction • Temporary drains to sanitary sewer allowed during construction only • Direct existing to sanitary sewer, if practical • Direct existing to landscaping or permeable area
Air conditioning condensation	<ul style="list-style-type: none"> • Direct existing to landscaping or permeable area • Direct to sanitary sewer, if practical • Encourage shallow pan-condensate removal unit • Encourage shallow pan-evaporation
Individual residential vehicle washing (to the MS4)	<ul style="list-style-type: none"> • Direct wash water to landscaped areas or permeable surfaces where feasible • Minimize water, washing detergent and vehicle cleaning/washing products • Promote and encourage practices or behaviors that prevent the discharge of pollutants • Vehicle washing in the City Right-of-Way is prohibited (by Ordinance) • Also see Section 3.5.5
Dechlorinated swimming pool discharges	<ul style="list-style-type: none"> • Prohibited by Ordinance • Discharge to sanitary sewer authorized only by Public Services
Non-emergency firefighting discharge – building suppression maintenance	<ul style="list-style-type: none"> • Allowed to MS4 if no pollutants found through testing with Public Services oversight • Direct to landscaping or permeable area • Direct to sanitary sewer, if practical • Also see Section 3.5.6
Non-emergency firefighting discharge – firefighting (i.e., controlled or practices blazes, training, maintenance)	<ul style="list-style-type: none"> • Allowed to MS4 if no pollutants found through testing with Public Services oversight • Direct to landscaping or permeable area • Direct to sanitary sewer, if practical • Also see Section 3.5.6
Emergency firefighting discharge	<ul style="list-style-type: none"> • Coordinated with Public Services • Direct to sanitary sewer, if practical • Direct to landscaping or permeable area • Also see Section 3.5.6



3.5.5 Individual Residential Car Washing on Private Property

Individual residential car washing is permitted on private property but must comply with BMPs and the requirements described in CMC Section 61.08.020. The BMP requirement applies to any motor vehicle, boat and equipment washing activities. The applicable BMPs are summarized in Table 3-2 and include:

1. No washing on City streets, parkways or alleys (City's right-of-way);
2. Washing over or directing flows to permeable surfaces on private property such as landscaped areas (lawns), gravel areas or other pervious areas, where feasible;
3. Minimize water use (install shut-off hose nozzle), washing detergent and vehicle cleaning/washing products;
4. Dispose of remaining detergent solutions to the sanitary sewer; may not be disposed of to the MS4 or receiving waters;
5. The use of "hose off" or single-use engine degreasing chemicals is prohibited unless captured and disposed of properly;
6. Other washing (non-residential, non-individual) including commercial and mobile service is prohibited unless water is diverted to, captured, or disposed to a permeable area or the sanitary sewer.

3.5.6 Non-Emergency and Emergency Firefighting

This section describes the City's program to reduce pollutants from non-emergency firefighting flows (i.e., flows from controlled or practice blazes and maintenance activities) determined to be a significant source of pollutants to waters of the U.S.

The City of Coronado Fire Services Department conducts very limited non-emergency firefighting activities, as defined in the Permit, and implements BMPs specific to the activity as appropriate. The Fire Service Department is aware that any changes to non-emergency firefighting activities or training exercises must be reviewed by the Public Services Department and that each activity must take into account implementing BMPs to the MEP.

Since 2001, the City's Fire Services Department has conducted very few, and only minor non-emergency firefighting exercises. The current non-emergency firefighting exercises are limited to hand line training conducted at either Vetter or Coronado Cays parks which are located near each of the two fire stations. Any other exercises or training events (non-emergency activities) are directed to permeable surfaces to capture/infiltrate flows as the minimum BMPs. Training events using 1 ¾ or 2 ½ inch hose systems including the MasterStream unit are not anticipated, but could be included if provisions for a compliant discharge can be made through the implementation of additional BMPs.



A secondary source of pollutants associated with non-emergency firefighting may originate from firefighting equipment maintenance and cleaning. The Fire Services Department has identified areas and methods to control these sources by limiting these maintenance activities to specific areas at the stations that discharge to the sanitary sewer or storm drain inlets that can be secured or diverted to the sanitary sewer system.

Non-emergency firefighting activities and routine operations by the Coronado Fire Department are subject to BMPs in order to comply with the Permit and prevent the discharge of pollutants to the MS4. (Permit Provision E.2.a.(5)(a).

Emergency firefighting activities are subject to BMPs with priority of efforts toward life, property and the environment (in descending order). BMPs should not interfere with immediate emergency response operations or impact public health and safety. Permit Provision E.2.a.5(b).

Discharges other than storm water runoff are not allowed to enter the City's MS4, and activities associated with maintenance or upkeep of fire equipment is included in the prohibition. The BMPs described in the following section shall be implemented when non-emergency firefighting activities are performed in Coronado.

3.5.6.1 BMPs for Non-Emergency Firefighting

This section describes which BMPs will be implemented, or required to be implemented for non-emergency firefighting and associated maintenance activities for equipment, including pollution prevention measures to comply with Permit Provision E.2.a.(5)(a).

The Fire Services Department is aware that any changes to non-emergency firefighting activities or training exercises must be reviewed by the Public Services Department and that each activity must take into account implementing BMPs to the MEP.

Defined Training Locations

Fire Services staff will conduct hand line training at designated City parks, preferably Vetter Park and the Cays Park, that do not lead to a discharge of runoff water to the MS4 or receiving waters (beaches or the bay). Water discharged from fire equipment shall be limited in time and the area of discharge so that it can infiltrate into landscaping and preferably grass areas.

Storm Drain Inlet Protection

Any additional training exercises that have an increased volume or duration may increase the runoff potential based on the flow and length of time of the training event. These training events shall be coordinated with the Public Services Department to identify any inlets or other storm drain structures that will need to be blocked or covered to prevent the introduction of discharges and/or pollutants from land (i.e. fertilizer, sediment from landscaped areas). Public Services may



also have a vacuum truck ready or on stand-by to respond to the need to capture any discharges from entering the MS4.

Training

City of Coronado employees receive annual training on storm water regulations and JRMP program implementation strategies. Employees in the Fire Services Department also receive job-specific training to perform the tasks associated with the BMPs described this section regarding the sources and BMPs associated with non-emergency firefighting activities.

3.6 Prevent and Detect Illicit Discharges and Connections Requirements

Permit Requirement:	Provision E.2.b
Title:	Prevent and Detect Illicit Discharges and Connections
Brief Description:	The City must include in its program specific measures described in the Permit to prevent and detect illicit discharges to the MS4.
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Permit Provision E.2.b describes the minimum program measures that the City must include in its IDDE Program to prevent and detect illicit discharges to the MS4. The minimum measures are:

1. Maintaining an updated map of the entire MS4 and the corresponding drainage areas. The accuracy of the MS4 map must be confirmed during the field screening per Permit Provision E.2.c.

The MS4 map must be included as part of the JRMP document. Any geographic information system (GIS) layers or files used by the City to maintain the MS4 map must be made available to the San Diego Water Board upon request. The MS4 map must identify the following:

- (a) All segments of the MS4 owned, operated, and maintained by the City;
- (b) All known locations of inlets that discharge and/or collect runoff into the City’s MS4;
- (c) All known locations of connections with other MS4s not owned or operated by the City (e.g. Caltrans MS4s);
- (d) All known locations of MS4 outfalls and private outfalls that discharge runoff collected from areas within the City’s jurisdiction;



- (e) All segments of receiving waters within the City's jurisdiction that receive and convey runoff discharged from the City's MS4 outfalls;
 - (f) Locations of the MS4 outfalls, identified pursuant to Permit Provision D.2.a.(1), within the City (refers to all major outfalls); and
 - (g) Locations of the non-storm water persistent flow MS4 outfall discharge monitoring stations, identified pursuant to Provision D.2.b.(2).
2. The City must employ personnel and contractors to assist in identifying and reporting illicit discharges and connections during their daily employment activities.
3. The City must promote, publicize, and facilitate public reporting of the presence of illicit discharges or water quality impacts associated with discharges to or from the MS4, including the following methods for public reporting:
 - (a) Operate a public hotline, which can be City-specific or shared by the Copermittees, and must be capable of receiving reports in both English and Spanish 24 hours per day and seven days per week; and
 - (b) Designate an e-mail address for receiving electronic reports from the public, which can be City-specific or shared by the Copermittees, and must be prominently displayed on the City's webpage and the Regional Clearinghouse required pursuant to Permit Provision F.4.
4. The City must implement practices and procedures (including a notification mechanism) to prevent, respond to, contain, and clean up any spills that may discharge into the MS4 within its jurisdiction from any source. The City must coordinate, to the extent possible, with spill response teams to prevent entry of spills into the MS4, and prevent contamination of surface water, ground water, and soil. The City must coordinate spill prevention, containment, and response activities throughout all appropriate City departments, programs, and agencies.
5. The City must implement practices and procedures to prevent and limit infiltration of seepage from sanitary sewers (including private laterals and failing septic systems) to the MS4.
6. The City must coordinate, when necessary, with upstream Copermittees and/or entities to prevent illicit.

The City's implementation and status on these minimum requirements is provided in Section 3.7.



3.7 Prevent and Detect Illicit Discharges and Connections Implementation

The City has developed a multi-faceted approach to the prevention and detection of illicit discharges and connections as described in this section. The IDDE Program meets the minimum requirements of Permit Provision E.2.b and supports the jurisdictional strategies (Section 3.2) from the San Diego Bay WQIP.

3.7.1 IDDE Program Implementation Measures

The successful implementation of the illicit discharge and connection prevention and detection program includes two core components:

1. Implementation of the IDDE Program measures – A program that includes inspections, investigations and prevention related to illicit non-storm water discharges (Sections 3.3 and 3.4, Table 3-1 above) associated with infrastructure facilities and incidents reported by City personnel and the public. A comprehensive description of the IDDE Program is provided in Section 3.7.2.
2. Implementation of the MS4 Outfall Monitoring Program – A program that includes visual inspections, sampling, testing, and investigation of MS4 outfall discharges to identify illicit discharges of non-storm water and persistent flows. A comprehensive description of the MS4 Outfall Monitoring Program is described in Section 3.11.

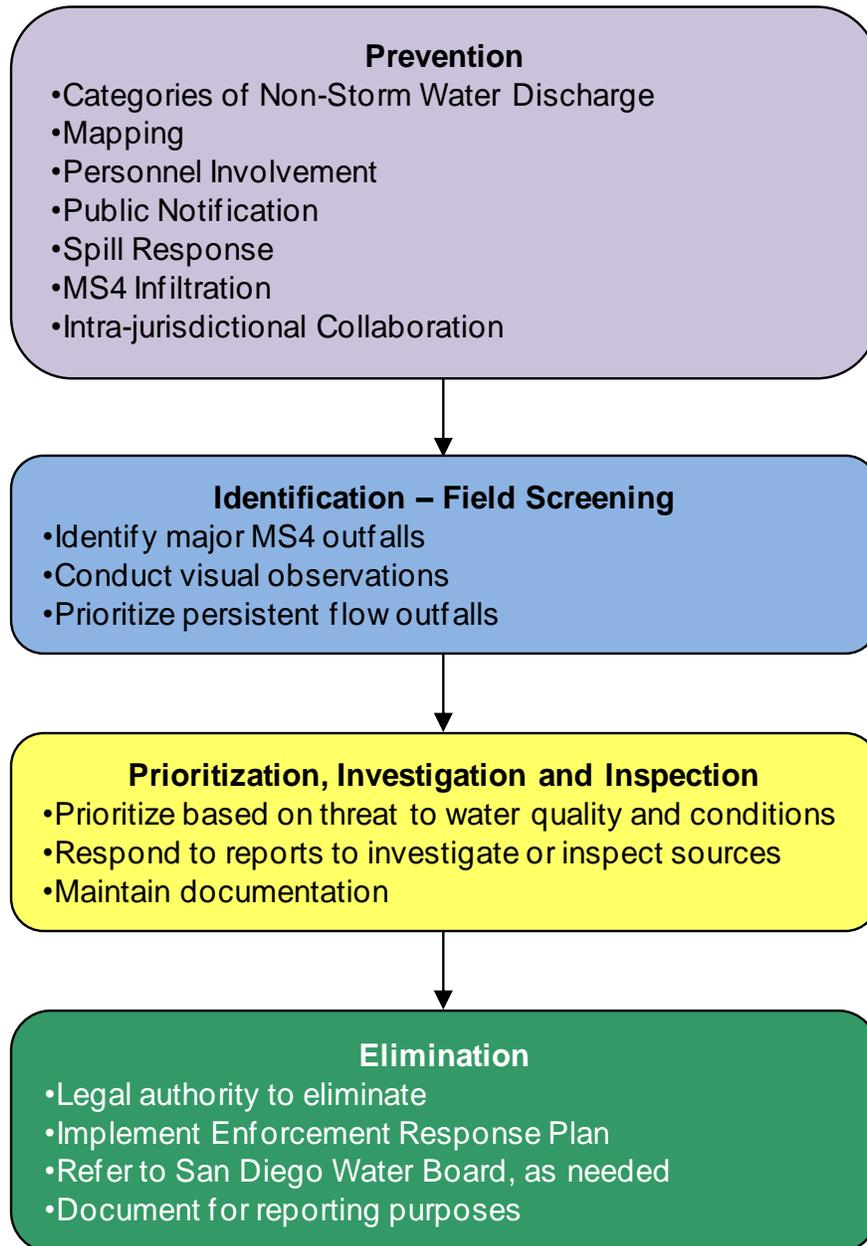
Permit Provision E.2.b outlines the minimum JRMP and IDDE Program measures required to prevent and detect illicit discharges and connections to the MS4.

Permit Provision D.2 outlines the requirements for MS4 Outfall Discharge Monitoring that is complementary to the IDDE Program.

The hierarchy of the IDDE Program, as introduced above, is illustrated in Figure 3-1.



**Figure 3-1
IDDE Program Implementation Hierarchy**



3.7.2 IDDE Implementation Measures Status

The status of the City's implementation of the minimum IDDE implementation measures is summarized in Table 3-3. The method to implement the measures is discussed in detail in this section.



**Table 3-3
 IDDE Program Implementation Minimum Measures Status**

Category	Type	Status
MS4 Map (Provision E.2.b.(1))	Map meets all feature requirements described in the Permit	√
Personnel (Provision E.2.b.(2))	Personnel and contractors assisting in IDDE Program implementation, as part of daily activities	√
Public Reporting (Provision E.2.b.(3))	Public reporting is promoted, publicized and facilitated as described in the Permit, including a public hotline and email address	√
Spill Response (Provision E.2.b.(4))	Spill coordination, prevention, containment and response activities are in place as described in the Permit	√
Sanitary Sewer Seepage into the MS4 (Provision E.2.b.(5))	Practices and procedures are in place to prevent and limit infiltration of seepage from the sanitary sewer into the MS4	√
Intra-jurisdictional MS4 (Provision E.2.b.(6))	Intra-jurisdictional coordination with other MS4 owners or adjacent jurisdictions is in place to prevent illicit discharges into the MS4	√

3.7.2.1 Map [Permit Provision E.2.b.(1)]

The City has an existing map of the MS4 that is comprehensive and was prepared in a geographic information system (GIS) format. Map book pages are based on a grid system across the City that include street names, parcel information (address number) and sanitary sewer system infrastructure that allows City staff to assess any potential illicit discharges or system problems expeditiously. Map books are maintained by the Public Services and Engineering Department and a comprehensive update is performed every couple of years. Minor corrections and notation are logged on a master copy of the map book to track future electronic copy updates.

3.7.2.2 Personnel [Permit Provision E.2.b.(2)]

City of Coronado employees and contract personnel receive annual training on storm water regulations and JRMP program implementation strategies that include identification of illicit discharges and connections during the conduct of daily activities and duties. Employees in the Public Services and Engineering Department receive awareness training to identify and notify Storm Water staff or Public Services dispatch to respond to the illicit discharges and other activities that may pose a threat to water quality. In addition, both Wastewater Operations and Storm Water Program staff are available and trained to provide mutual support, as needed, for a variety of tasks including responses to spill, illicit dischargers and activities that may impact receiving water quality. The City has in place SOPs for all its sanitary sewer and MS4 operation and cleaning activities and they are the basis for job-specific training implemented as part of the IDDE Program. The City's SOPs are updated periodically and training is implemented immediately after revisions are completed.



3.7.2.3 Public Reporting [Permit Provision E.2.b.(3)]

Public reporting of spills, overflow and non-emergency incidents or complaints are processed in a number of ways as described in this section.

Permit Provision E.2.b.(3) require that Coronado promote, publicize and facilitate public reporting of the presence of illicit discharges or water quality impacts associated with discharges into or from MS4s.

Storm Water Hotline

Coronado has an established storm water hotline (619-522-7380) which is capable of receiving reports 24 hours a day. After normal working hours, callers are directed to call the Coronado Police Department (619-522-7350) to report any spill or illicit discharges.

In addition, Coronado also participates in the regional storm water hotline currently operational within San Diego County (County): the toll-free Regional Storm Water Hotline, 1-888-846-0800, and the Think Blue Hotline, 1-888-THINK BLUE (1-888-844-6525). Both hotlines are answered by the County's Department of Environmental Health, Monday through Friday, 8:00 a.m. - 5:00 p.m. In addition to personal service during regular business hours, the hotline provides a voice mail message for 24-hour public access in both English and Spanish. The County has provided these services to Copermittees since December 1997. Through this hotline, complaint information for incidents in Coronado is forwarded to Coronado's Public Services Department for follow up and/or investigation.

Website Resources

The City's website (www.coronado.ca.us) includes an Action Center tab for the public to contact the City directly on a variety of very specific topics. One Action Center item allows the public to fill out a complaint or report storm water and runoff concerns over irrigation, illicit spills, construction, debris, etc. As shown in Figure 3-2, the City's Action Center page allows the public to provide an address and message on the incident or concern to City staff.

Maintaining the City's website to encourage reporting of illicit discharges is a jurisdictional strategy that supports the focused priority water quality condition of swimmable waters (beaches) in Coronado. Swimmable waters is a focused priority water quality condition in the San Diego Bay Water Quality Improvement Plan for the Coronado hydrologic sub-area of the watershed.

Permit Provision E.2.b.(3)(b) requires that the City designate a City email address for receiving electronic reports from the public. The email address must be prominently displayed on the City's website and Regional Clearinghouse (www.projectcleanwater.org). The City's email address is: stormwaterinspection@coronado.ca.us.



Figure 3-2
City Website – Action Center Page for the Storm Water Division

CITY OF CORONADO CALIFORNIA

Search the website

[Home](#) [Government](#) [Residents](#) [Business](#) [Visitors](#) [Site Tools](#) [Action Center](#)

[Action Center Home](#) | [Log In](#)

Request for storm water concerns over irrigation, illegal spills, construction, debris

Step 1 of 1

Use this form to report storm water concerns over irrigation, illegal spills, construction, debris in the City of Coronado. You will be able to track the progress of your request online using either your email address (if provided) or a tracking number generated by the system.

* Denotes a required field

Provide the Following Information

Address*

Message*

Contact Information

Please include your contact information, as we sometimes need clarification before we can complete your request. Your contact information is confidential.

Full Name*

Street Address

Telephone -- ext

Fax -- ext

Email*



Complaint Receipt

Each complaint received is logged into the Public Services Work Order system by Public Services personnel. Staff documents all required information when complaints are initially received to facilitate field staff contact with the reporting parties. This expedites the prioritization and timely investigation of complaints since it depends on the accuracy and completeness of the information received. The following information is documented, if known, when a hotline call is received.

- Complainant information (contact name, address, phone number) unless anonymous
- Responsible party information (name, address, phone number) if available
- Location and description of the discharge
- Materials and waste involved

The inspector or investigator will use the City's standardized Storm Water General Inspection Form which is used to log both complaints and routine inspections (see Storm Water Standards Manual, Section 3-A). Once the inspection is completed the work order is closed in the system.

Complaint Prioritization, Routing and Referral

Coronado staff will respond to and resolve each reported incident in a timely manner depending on the urgency of the complaint. Hotline receptionists are familiar with, and are able to assess, the relative urgency of the calls they receive. High priority complaints (e.g., those involving hazardous materials, threat to public safety, etc.) require immediate referral to Storm Water Division staff and/or the Fire Services Department.

In all instances, complaints received through Coronado's storm water hotline or received through the Police will be assigned to Storm Water staff. Other City departments which may receive storm water or urban runoff complaints have been directed to forward those items to the Public Services Department Storm Water Division. This will ensure that all reports are appropriately received, routed, and investigated. When complaints are routed to other entities (Port District, Caltrans, Navy), Coronado will confirm that they have been received and request information regarding the resolution of the complaint.

For discharges involving hazardous or unknown materials, both the Public Services and the Fire Services Department will be dispatched to investigate. The Fire Department will dispatch the San Diego Hazardous Incident Response Team (HIRT) if needed.

Complaint Investigation

Complaints received through the County or City Storm Water Hotline will be investigated using the procedures described above.



The City's robust public reporting program is tailored to meet the public's need for responsive services and meets the requirements of the Permit. The reporting program supports the identification of illicit discharges, including sewage spills, to support the focused priority water quality condition of swimmable beaches (water) in the San Diego Bay WQIP.

3.7.2.4 Spill Response [Permit Provision E.2.b.(4)]

As described in Section 3.7.2.2, in addition to cross-training staff in both storm water and wastewater system priorities and response, the City prevents spills through the implementation of the City's Waste Discharge Requirements Program; the City's Capacity, Management, Operations, and Maintenance (CMOM) Program; the City's Dry/Wet Weather Diversion Program; and other preventive maintenance activities. These program documents may be consulted for details and are incorporated into the JRMP by reference.

Permit Provision E.2.b.(4) requires that Coronado implement practices and procedures (including a notification mechanism) to prevent, respond to, contain and clean up any spills that may discharge into the MS4 within its jurisdiction from any source.

Coronado's Wastewater Utility Division is responsible for responding to leaks and spills from Coronado's sewer collection systems and will implement all remedial actions to the extent that they are applicable to the discharge including the following:

1. Interception and re-routing of sewage flows around the sewage line failure
2. Vacuum truck recovery of sanitary sewer overflows (SSOs) and wash down water
3. Use of portable aerators where complete recovery of the SSOs is not practicable and where severe oxygen depletion in existing surface waters is expected
4. Cleanup of debris of sewage origin at the overflow site
5. Notification to internal and external customers, as necessary and required
6. Notification to agencies, as required

Spill Receipt of Notification

In support of Permit Provision E.2.b.(4), the following section provides a description of the mechanism in which Coronado will receive notification of spills.



Permit Provision E.2.b.(4) requires that Coronado coordinate, to the extent possible, with spill response teams to prevent entry of spills into the MS4, and prevent contamination of surface water, ground water, and soil. The City must coordinate spill prevention, containment, and response activities throughout all appropriate departments, programs and agencies.

In most cases, sewage and other spills reaching the MS4 are likely to be observed by citizens or City employees. Since Coronado is ultimately responsible for ensuring that these spills do not enter its MS4, Coronado has put in place a 24-hour, year-round spill notification protocol using both the Police Department and Coronado's storm water hotline to initiate spill response efforts (see Public Reporting in Section 3.7.2.3).

Sewer or MS4 related complaints or notification of spills are received through Coronado's storm water hotline, referrals from other staff or agencies, or a number of other channels. Coronado will coordinate as necessary with other agencies and departments receiving water quality related reports within their jurisdictions to ensure that all reports are appropriately received, routed, and investigated. Most of the City's urban runoff related handouts and educational materials include the hotline number. In addition, the City's public education efforts stress the importance of reporting incidents and describe the critical role that the public plays in the identification and elimination of illicit discharge pollution.

Spill Reporting

As required by Section I of Attachment B of the Permit, Coronado will report any noncompliance, including sewage spills that may endanger human health or the environment to the San Diego Water Board orally within 24 hours from the time the City becomes aware of the circumstances. A written account of the incident and cleanup actions will be provided to the San Diego Water Board within five (5) days from the time the City becomes aware of the circumstances.

In addition to the Permit spill reporting requirements and depending on the type and conditions of the spill, Coronado is legally obligated to report to other regulatory agencies when a spill occurs.

3.7.2.5 Sanitary Sewer Seepage Infiltration into the MS4 [Permit Provision E.2.b.(5)]

Background

The sanitary sewer system functions primarily for the collection and conveyance of sewerage from commercial and residential properties, as well as from the U.S. Navy. The sewerage is ultimately delivered to the City of San Diego for treatment. The goal of this program is to efficiently transport all sewage and reduce/eliminate stoppages and/or spills by implementing a proactive preventive maintenance and capital improvement program.



The City's sanitary sewer operation and maintenance program is the basis for the prevention of infiltration into the MS4 system.

Permit Provision E.2.b.(5) requires that Coronado implement practices and procedures to prevent and limit infiltration of seepage from sanitary sewers (including private laterals and failing septic systems) to the MS4.

Note: no septic systems are known to exist in the City of Coronado.

The City maintains the sanitary sewer system and is subjected to various Water Discharge Requirements (issued by the State or San Diego Water Boards) and permits for its operation and maintenance of the system. The City's MS4 includes several runoff diversion structures that are connected to the sanitary sewer system. This section provides an overview of the City's implementation of various sanitary sewer maintenance plans and programs to comply with mandates from the San Diego Water Board and SWRCB.

The Public Services Department is responsible for operation and maintenance of both the sanitary sewer system and MS4. The operation and maintenance program for the sanitary sewer includes a comprehensive inspection, cleaning, repair, and maintenance program. The City's Capital Improvement Project (CIP) program includes funding for sanitary sewer replacement, improvements, and major repairs. The CIP program meets or exceeds industry standards and other regulatory requirements.

The City's sanitary sewer program includes preventive maintenance activities to reduce the risk of failure and leaks that could lead to the infiltration of sanitary sewage to the MS4 or releases to the receiving waters (directly or indirectly). The City operates a closed-circuit television inspection program for underground MS4 pipes that can assist crews in identifying specific problem areas and sewer system leaks infiltrating the MS4.

Sanitary Sewer Program Requirements

Coronado has a multi-prong approach to the operation and maintenance of the sanitary sewer system that aligns multiple and overlapping regulations and requirements that ultimately support the prevention of infiltration into the MS4 and spills that ultimately enter the MS4 or receiving waters. The sanitary sewer multi-prong approach is described in detail the following program documents:

1. The City's Sanitary Sewer SOPs;
2. Sanitary Sewer Overflow (SSO) Response Plan; and
3. Fats, Oil and Grease (FOG) Prevention Program, to comply with other state permits.

The City has a comprehensive sanitary sewer inspection, cleaning and preventive maintenance program implemented using the Sanitary Sewer SOPs.



Sanitary sewer structures inspected, cleaned, and/or maintained include grease interceptors, pump stations, lift stations, underground pipes, and manhole structures.

Implementation of BMPs

Coronado has implemented the following specific BMPs for sewer conveyance, to the maximum extent practicable, and those specific requirements under the Statewide General Waste Discharge Requirements for Sanitary Sewer System (Order No. 2006-0003) and any amendments thereafter.

1. Inspecting the underground sanitary sewer system pipes using camera equipment and cleaning underground sanitary sewer system pipes using a vacuum truck;
2. Inspecting and cleaning known priority areas at a higher frequency (monthly);
3. Inspecting all pump stations at least twice weekly for preventive maintenance;
4. Performing non-emergency sewer facility repairs and construction as needed;
5. Performing emergency sewer facility repairs and construction as needed;
6. In all cases, properly handling materials and disposing of waste removed during maintenance activities in a manner that will not release the material to the storm drain system, or in any other way contaminate storm water runoff;
7. Posting receiving waters as required by the San Diego County Department of Environmental Health; and
8. Food Establishment Waste Discharge (FEWD) permitting and inspections to prevent grease related sewage overflows.

Sanitary sewer system operation and maintenance procedures are established in the City's Sanitary Sewer Operation and Maintenance SOP and record keeping is utilized by the Public Services Department to increase implementation efficiency and the effectiveness through a work order system. The sanitary sewer system inspection and cleaning logs are kept to ensure that the schedule is implemented for various compliance requirements, including the Municipal Storm Water Permit, and that data and information is assessed as part of the annual assessment, as needed. The Public Services Department has an established work order system that tracks all tasks assigned to its crews. Detailed information is collected in the inspection and cleaning logs including any suspected defects that may allow sewage seepage into the surrounding soil, environment or the MS4.



3.8 IDDE Program - Field Screening, Investigation and Elimination Activities Requirements

Permit Requirement:	Provision E.2.c and E.2.d
Title:	Field Screening and Investigate and Eliminate Illicit Discharges and Connections
Brief Description:	The City must conduct field screening of MS4 outfalls and other portions of the MS4 to detect non-storm water and illicit discharges and connections to the MS4 in accordance with the dry weather MS4 outfall discharge monitoring requirements in Provision D.2.
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Permit Provision E.2.c. requires the City to conduct periodic field screening activities of the MS4 to verify the existence of illicit discharges and connections to the MS4. Field screening and investigation activities to find MS4 discharge sources may originate from routine activities, such as the Dry Weather MS4 Outfall Discharges Monitoring Program (Permit Provision D.2), the inspection of the MS4 or sanitary sewer (to detect any cross-connections or infiltration), and from activities in response to City personnel or the public reporting of suspected spills or illicit discharges. Permit Provision E.2.d requires the City to conduct investigations of potential sources and to identify them as a transient or persistent MS4 flow. All MS4 flows are investigated by the City to identify the source or cause and conduct activities to eliminate it or refer it for permitting, as required, by the San Diego Water Board. The specific IDDE Program activities undertaken by the City to eliminate non-storm water illicit discharges are described in this section.

Permit Provision E.2.c and E.2.d outline the minimum IDDE Program activities required to prevent and detect illicit discharges and connections to the MS4.

The MS4 Outfall Monitoring Program (Permit Provision D.2) supports the IDDE Program through routine visual observation and inspection of MS4 outfalls. Other supporting IDDE Program activities include personnel training, awareness and reporting, public reporting, spill response, prevention and correction of sanitary sewer seepage into the MS4, and collaboration with other jurisdictions with MS4 connections to the City's MS4.

The Permit prescribes numerous and extensive measures that must be included in the IDDE program to investigate and eliminate illicit discharges to the MS4. These measures are listed in Permit Provisions E.2.d.(1)-(4). In summary they include the following:

1. A system to prioritize follow-up investigations of visual observations and/or monitoring data for detected non-storm water or illicit discharges. The system must include the requirements listed in the Permit.



2. Procedures to investigate and inspect the MS4 for reasonably suspected illicit discharges, connections or other sources of non-storm water. The procedures must include the requirements listed in the Permit.
3. Implement procedures to eliminate all detected and identified illicit discharge and connections. The procedures must include the requirements listed in the Permit.
4. Submit a summary of the non-storm water discharges and illicit discharges and connections investigated and eliminated as part of the San Diego Bay WQIP Annual Report (see Section 3.12).

The City's implementation of the IDDE Program is presented in both Sections 3.8 and 3.9 due to the overlapping nature of the prevention, detection, field screening, investigation, and elimination requirements.

3.9 IDDE Program - Field Screening, Investigation and Elimination Activities Implementation

The City's implementation of the IDDE Program requirements for field screening, investigation and elimination activities are provided in this section.

3.9.1 Field Screening

Field screening (Permit Provision E.2.d) requires that the City conduct activities that include visual observations, field testing, and/or analytical testing of MS4 outfalls and other portions of the MS4 within its jurisdiction to detect non-storm water and illicit discharges and connections to the MS4. In accordance with Permit requirements, the Transitional Dry Weather MS4 Outfall Discharge Field Screening Monitoring⁷ [Permit Provision D.2.a.(2)] was performed twice per year at the City's seven (7) major outfalls to identify transient and persistent flows for subsequent prioritization and to create an inventory of outfalls for on-going Dry Weather MS4 Outfall Discharge Monitoring [Permit Provision D.2.b.(1)] that primarily focuses on monitoring the five (5) highest priority, persistent flow MS4 outfalls. In Coronado, one (1) persistent flow outfall was verified during the transitional monitoring period and the subject of an investigation of the source(s).

Implementation of the Transitional Dry Weather MS4 Outfall Discharge Field Screening Monitoring activities yielded the results listed in Table 3-4.

⁷ This "Transitional" Program is implemented during the interim period between Permit adoption on June 27, 2013 and the final acceptance of the JRMP by the San Diego Water Board estimated shortly after submittal on June 27, 2015.



**Table 3-4
Coronado’s MS4 Major Outfalls (2014)**

New Site ID (2015)	Previous Site ID	Location Description	Latitude	Longitude	Historical Flow ⁸ Data Available?	Flow Determination ⁹
59	1B	Bandel Diverter North Beach	32.6866	-117.1934	Yes	Dry
60	1P-54	Parker Diverter North Beach	32.6866	-117.1934	Yes	Dry
19	33	First St and A Ave	32.6987	-117.1684	Yes	Undetermined
16	35	Centennial Park	32.7000	-117.1718	Yes	Persistent
36	NA	Golf Course	32.6819	-117.3217	No	Undetermined ¹⁰
14	37	First St and Alameda Blvd East ¹¹	32.7026	-117.1812	Yes	Dry
13	37	First St and Alameda Blvd West ¹⁰	32.7026	-117.1812	Yes	Dry

The MS4 Outfall Monitoring Program is described in the San Diego Bay WQIP’s Monitoring and Assessment Plan (MAP) and expanded in the City’s MS4 Outfall Monitoring Program found in Storm Water Standards Manual Section 3-B.

3.9.2 Prioritization, Investigation and Elimination of Illicit Discharges and Connections

Per Permit Provision E.2.d, the City must prioritize and determine when follow-up investigations will be performed in response to visual observations and/or water quality monitoring data collected during an investigation of a detected non-storm water or illicit discharge to or from the MS4.

⁸ Flow is defined as the presence of flowing, ponded or pooled water.

⁹ Persistent flow is defined 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. When available, historical data should be used to determine if flow is persistent or transient.

¹⁰ New site subject to field screening as of April 2015.

¹¹ Site moved to outfall point from the first upstream manhole.



After detection of a non-storm water discharge or connection, the next stage in the hierarchy of the IDDE Program's implementation is the prioritization of illicit discharge or connection to the MS4 as specified in Permit Provision E.2.d.

The jurisdictional strategies listed in the San Diego Bay WQIP for the City of Coronado include conducting inspections in targeted areas or designated as high priority for IDDEs of bacteria sources (e.g., sewer system cross-connections).

The criteria for prioritizing investigations per Permit Provision E.2.d.(1)(a)-(e) are:

1. Pollutants identified as causing or contributing to the highest water quality priorities identified in the San Diego Bay WQIP;
2. Pollutants identified as causing or contributing, or threatening to cause or contribute to impairments in water bodies on the 303(d) List and/or in Environmentally Sensitive Areas (ESAs), located within Coronado;
3. Pollutants identified from sources or land uses known to exist within the area, drainage basin, or watershed that discharges to the portion of the MS4 within included in the investigation;
4. Pollutants identified as causing or contributing to an exceedance of a Numeric Action Level (NAL) in the San Diego Bay WQIP; and
5. Pollutants identified as a threat to human health or the environment.

The San Diego Bay WQIP includes the focused priority water quality condition for City of Coronado and the Coronado HSA as bacterial indicators to protect swimmable waters. The Coronado HSA does not have a highest water quality condition specified. Prioritization of investigations should take place that targets bacteria sources unless other eminent or immediate threats to human health and the environment are identified.

The Permit requires that the City implement procedures to investigate and inspect portions of the MS4 for which reports or notifications, field screening, or other appropriate information indicated there is a reasonable potential of receiving, containing, or discharging pollutants due to illicit discharges, illicit connections, or other sources of non-storm water.

After detection and prioritization of a non-storm water discharge or connection, the next stage in the hierarchy of the IDDE Program's implementation is the investigation and elimination of illicit discharge or connection to the MS4 as specified in Permit Provision E.2.d.



The reasonable potential is identified through reports or notifications, field screening, or other appropriate information and as noted earlier, they are prioritized for response. The procedures to investigate include the following criteria (Permit Provision E.2.d.(2)(a)):

1. Assess the validity of each report or notification received:
 - a. Obtain information from the reporting party or source to pre-screen and validate the possible origin.
 - b. Verify the circumstances of the discharge (e.g., current taking place, re-occurring, persistent).
2. Prioritize and response to each report or notification received:
 - a. Apply criteria (a) through (e) listed above.

In addition, Permit Provision E.2.d.(3) specifies that the City must initiate the implementation of procedures, in a timely manner, to eliminate all detected and identified illicit discharges and connections within its jurisdiction. The procedures include these minimum items:

1. Enforcement of its legal authority, the Coronado Municipal Code and Enforcement Response Plan (JRMP Section 2), to eliminate illicit discharges and connections to the MS4.
2. If the City identifies the source as a controllable source of non-storm water or illicit discharge or connection, the City must implement its Enforcement Response Plan (Permit Provision E.6), per JRMP Section 2, to comply with and enforce its legal authority to prohibit and eliminate illicit discharges and connections to its MS4.
3. If the City identifies the source of the discharge as a category of non-storm water discharges listed in JRMP Sections 3.3 or 3.4, and the discharge is in exceedance of NALs in the San Diego Bay WQIP as shown in Tables 3-5 through 3-7, then the City must determine if:
 - a. This is an isolated incident or a set of circumstances that will be addressed through its Enforcement Response Plan, or
 - b. The category of discharge must be addressed through the prohibition of that category of discharge as an illicit discharge or controlled by the discharger through the use of controls or BMPs required by the City that have been approved by the San Diego Water Board [Permit Provision E.2.a.(6)].



**Table 3-5
NALs – MS4 to Surf Zone (Permit Table C-1)**

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
<i>Enterococci</i>	MPN/100 ml	35	-	104 ³	OP

Abbreviations/Acronyms:

AMAL – average monthly action level

MDAL – maximum daily action level

MPN/100 ml – most probable number per 100 milliliters

OP – Ocean Plan water quality objective

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 Water Quality Control Plan for the San Diego Basin (Basin Plan) water quality objective for saltwater “designated beach areas.”

**Table 3-6
NALs – MS4 to San Diego Bay (Permit Table C-2)**

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
<i>Enterococci</i>	MPN/100 ml	35	-	104 ³	BP
Priority Pollutants	µg/L	See Table 3-6			

Abbreviations/Acronyms:

AMAL – average monthly action level

BP – Basin Plan water quality objective

MDAL – maximum daily action level

MPN/100 ml – most probable number per 100 milliliters

NTU – Nephelometric Turbidity Units

OP – Ocean Plan water quality objective

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 3-7
 NALs – Priority Pollutants (Permit Table C-3)**

Parameter	Units	Freshwater (CTR)		Saltwater (CTR)	
		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:

AMAL – average monthly action level

CTR – California Toxics Rule

MDAL – maximum daily action level

µg/L - micrograms per liter

*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 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).

4. 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 must document and provide the data and evidence necessary to demonstrate to the San Diego Water Board that it is natural in origin and does not require further investigation. See Section 3.11 – Annual Reporting.
5. If the City is unable to identify and document the source of a recurring non-storm water discharge to or from the MS4, then the City must address the discharge as an illicit discharge and update this JRMP section to address the common and suspected sources of the non-storm water discharge in accordance with the City’s priorities.

The Permit [Permit Provision D.2.d.(2)(c)] requires that the City investigate and seek to identify the source(s) of discharges of non-storm water where flows are observed in and from the MS4 during the Dry Weather MS4 Outfall Discharge Field Screening Monitoring [Permit Provision D.2.b.(1)] as follows:

1. Obvious illicit discharges must be immediately investigated to identify the source(s) of non-storm water discharges;



2. The investigation must include field investigations to identify sources or potential sources for the discharge, unless the source or potential source has already been identified during previous investigations; and
3. The investigation may include follow-up field investigations and/or reviewing City inventories and other land use data to identify potential sources of the discharge.

Per Permit Provision E.2.d.(2)(b), the City must prioritize and respond to each valid report or notification (e.g., public reports, staff or contractor reports and notifications, etc.) of an incident in a timely manner. As noted, the City has procedures in place to receive, prioritize and respond to these types of reports and notifications.

3.10 Recordkeeping and Data Management

The City must maintain records and a database of the following information in order to comply with the Permit's records and database management requirements in Permit Provision E.2.d.(2)(d) and D.2.d.(4):

1. Location of incident, including hydrologic subarea (Coronado HSA 901.1), portion of MS4 receiving the non-storm water or illicit discharge, and point of discharge or potential discharge from MS4 to receiving water;
2. Source of information initiating the investigation (e.g., public reports, staff or contractor reports and notifications, field screening, etc.);
3. Date the information was received that lead to the investigation;
4. Date the investigation was initiated;
5. Dates of follow-up investigations;
6. Identified or suspected source of the illicit discharge or connection, if determined;
7. Known or suspected related incidents, if any;
8. Result of the investigation; and
9. If a source cannot be identified and the investigation is not continued, documentation of the response per Permit Provision E.2.d.(4) which state that the City must submit a summary of the non-storm water discharges and illicit discharges and connections investigated and eliminated as part of each San Diego Bay WQIP Annual Report (see Section 3.12).



Permit Provision E.2.d.(2)(d) specifies the information that must be recorded and data maintained as a result of the investigation and inspection of reported or identified illicit discharges and connections.

The Permit also requires information and data collection related to the MS4 Outfall Monitoring Programs, both Transitional Dry Weather Field Screening (temporary) and the on-going Dry Weather Field Screening Monitoring of the inventoried major outfalls and persistent flow outfalls.

Permit Provision E.2.d.(4) specifies that a summary of the investigations and elimination of non-storm water discharges and connections must be included in the San Diego Bay WQIP Annual Report (Section 3.12).

The City must also maintain records, in accordance with the focused water quality priority condition of the San Diego Bay WQIP (e.g., bacteria sources), seek to identify the source(s) of non-storm water discharges from the MS4 where there is evidence of non-storm water having been discharged into or from the MS4 (e.g., pooled water) through the implementation of the Transitional Dry Weather MS4 Outfall Discharge Field Screening Monitoring [Permit Provisions D.2.a.(2)] and the Dry Weather MS4 Outfall Discharge Monitoring [Permit Provision D.2.b.(1)].

The relationship between the MS4 Outfall Discharge Monitoring Program and the IDDE Program is provided in an overview of the monitoring program presented in Section 3.11.

3.11 Monitoring Program Overview

The MS4 Outfall Discharge Monitoring Program and the IDDE Program are only two of the numerous monitoring programs required by the Permit. The various monitoring programs were previously presented in Section 1 – Introduction and are summarized here in Table 3-8. The MS4 Outfall Discharge Monitoring Program is primarily intended to meet the field screening, persistent flow and source identification and elimination goals described in Section 3.9.



In addition, the City participates and complies with additional monitoring requirements for San Diego Bay Watershed and the Otay River hydrologic unit. These monitoring programs are part of the San Diego Bay WQIP and outlined in the San Diego Bay WQIP MAP.

The overview provided here is intended to clarify how the IDDE Program and the MS4 Outfall Discharge Monitoring Program operate together to reduce pollutants and eliminate non-storm water discharges. Table 3-8 lists all the required monitoring under the Permit. The “core” programs are shown in italic and bold font and the two programs that are part of the non-storm water discharge elimination goal are shown in italic and blue font.



**Table 3-8
Permit Required Monitoring Programs**

Monitoring Program	Permit Provision	Description	Implemented By
Water Quality Improvement Monitoring and Assessment Program	B.4.	Monitoring and assessment at the watershed level as part of the San Diego Bay WQIP	San Diego Bay WQIP Copermittees
Receiving Water Monitoring	D.1	Characterizes trends in the chemical, physical, and biological conditions of the receiving water to determine whether beneficial uses are protected, maintained, or enhanced. Includes participation in the Southern California Bight program and other related programs¹²	San Diego Bay WQIP Copermittees
1. Long-Term Receiving Water Monitoring Stations	D.1.b	In the San Diego Bay Watershed, the designated dry and wet weather long-term receiving water monitoring station is Sweetwater River. This site has been monitored historically since 2001	San Diego Bay WQIP Copermittees
2. Dry Weather Receiving Water Monitoring	D.1.c	Includes monitoring for chemistry, bacteria, toxicity, visual observations, field observations, hydromodification and bioassessment	San Diego Bay WQIP Copermittees
3. Wet Weather Receiving Water Monitoring	D.1.d	Includes monitoring for chemistry, bacteria, toxicity, field measurements and trash assessment	San Diego Bay WQIP Copermittees
MS4 Outfall Discharge Monitoring	D.2	Evaluates the potential contribution from MS4 discharges to receiving water quality	The City of Coronado as noted below
1. Transitional Dry Weather MS4 Outfall Discharge Field Screening Monitoring	D.2.a.(2)	Includes the interim monitoring program implemented during the transitional period between Permit adoption and implementation of the revised JRMP. Requires screening of major MS4 outfalls, visual observations with the primary goal of identifying persistent flows.	City of Coronado

¹² See latest version of the San Diego Bay MAP for details.



Monitoring Program	Permit Provision	Description	Implemented By
2. Transitional Wet Weather MS4 Outfall Discharge Field Screening Monitoring	D.2.a.(3)	Includes the interim monitoring program implemented during the transitional period between Permit adoption and implementation of the revised JRMP. Requires field observations and monitoring, and analytical monitoring of one major MS4 outfall in Coronado	City of Coronado in collaboration with the Regional Monitoring Workgroup through a contract with a consultant led by the County of San Diego
3. Dry Weather MS4 Outfall Discharge Monitoring	D.2.b	Includes seven City major outfalls inspected to identify and prioritize persistent flows. Monitoring is conducted for various analytical constituents for persistent flowing outfalls	City of Coronado
4. Wet Weather MS4 Outfall Discharge Monitoring	D.2.c	Includes one City location with two outfalls located at North Beach. Monitoring for various field and analytical constituents, including toxicity testing	City of Coronado through a contract with a specialized consultant either individually or in collaboration with the San Diego Bay WQIP Copermittees
3. Otay River Hydrologic Unit Swimmable Waters		Monitoring conducted to assess swimmable waters in the Otay River Watershed, Coronado HSA for bacterial indicators. Supports Focused Priority Water Quality Condition in the San Diego Bay WQIP and a City of Coronado goal. Includes outfall and receiving water monitoring during dry and wet weather at various locations in the Coronado HSA	City of Coronado through a contract with a specialized consultant either individually and/or with the City of Imperial Beach and the Port of San Diego
Special Studies	D.3	Various special studies related to water quality conditions such as bacteria, trash and metals¹³ Total Maximum Daily Loads (TMDL) monitoring is included in this section¹⁴	The City of Coronado through a contract and cost share program with regional Copermittees or applicable parties (TMDL)
Illicit Discharge Detection and Elimination	E.2	As part of the MS4 Outfall Discharge Monitoring Program and the implementation of various jurisdictional programs (e.g., inspections, complaint response), it aims to investigate and eliminate prohibited and illicit discharges to the MS4	The City of Coronado

¹³ See latest version of the San Diego Bay MAP for details.

¹⁴ The City of Coronado is not part of any TMDL implementation plan in the San Diego Bay Watershed.



3.11.1 Transitional Monitoring Program

The City has completed the initial tasks under the Transitional Monitoring program in the Permit and has developed the 2014 MS4 outfall inventory to comply with the field screening activities and identification of persistent flowing outfalls. The 2014 MS4 outfall inventory was finalized on December 15, 2014 and includes historical outfalls from the previous Dry Weather Monitoring Program and new outfalls for a total of seven (7) major outfalls that will be part of the on-going IDDE Program and Dry Weather MS4 Outfall Discharge Monitoring Program (Permit Provision D.2.b) as shown in Table 3-4. The inventory includes one (1) persistent flowing outfall (Centennial Park) per Permit Provision D.2.b.(2) and one wet weather monitoring site (Parker and Bandel outfalls located at North Beach; Figure 3-3) to comply with the Wet Weather MS4 Outfall Discharge Monitoring Program (Permit Provision D.2.c.).

**Figure 3-3
IDDE and Wet Weather Monitoring Location**



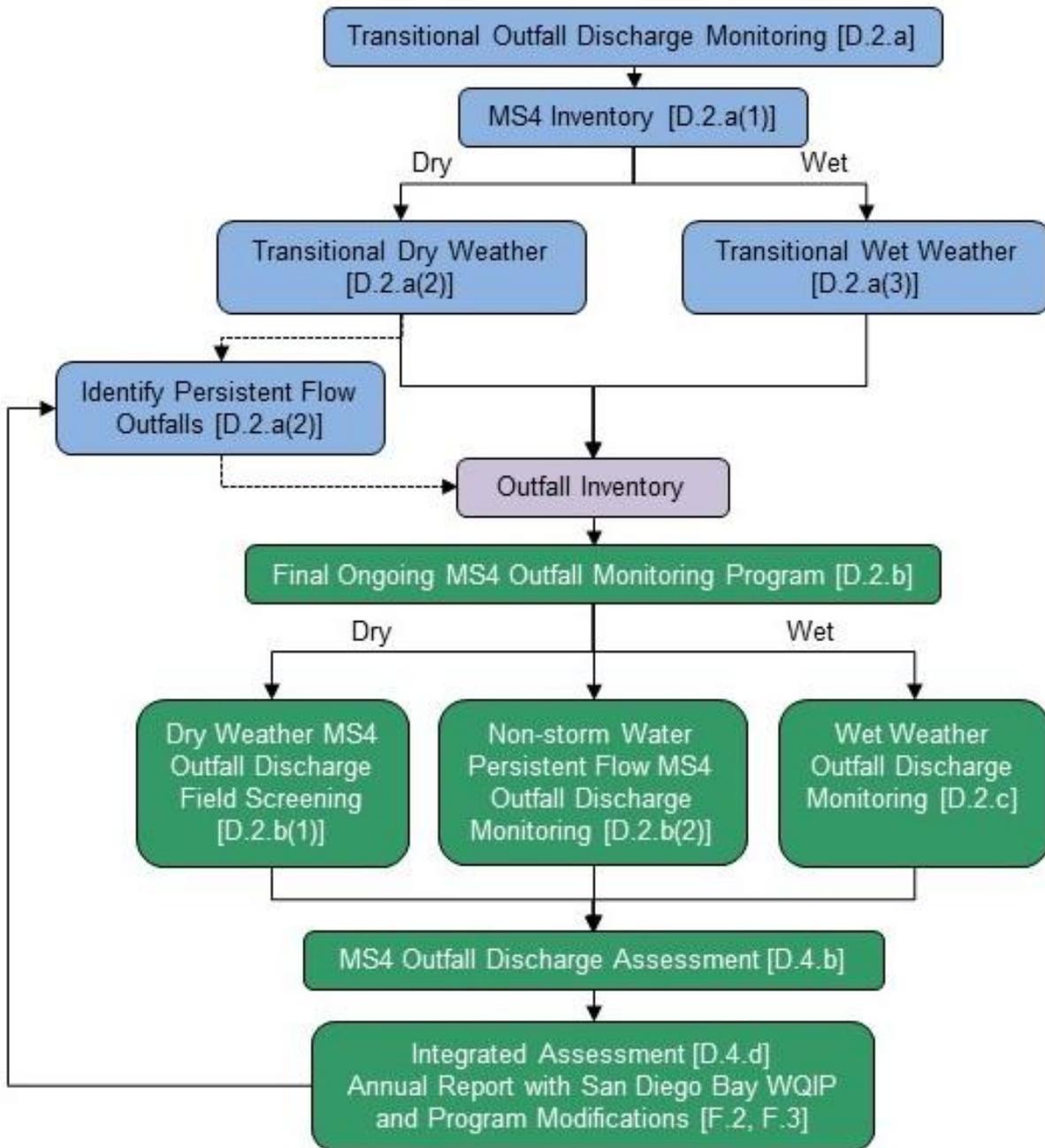
3.11.2 Dry and Wet Weather MS4 Outfall Discharge Monitoring Program

As part of the implementation of the IDDE Program, to identify illicit discharges of non-storm water flows, the City will implement the Dry and Wet Weather MS4 Outfall Discharge Monitoring Program. The dry weather component will be implemented by the City at the seven (7) major outfalls (subject to change as needed) by conducting semiannual visual observations and field screening as required [Permit Provision (D.2.b)]. In addition, any persistent flow MS4 outfalls will be monitored.



The detailed monitoring plan for the MS4 Outfall Monitoring Program is provided in the San Diego WQIP, MAP in Appendix A2. A schematic representing the implementation of all the components of the MS4 Outfall Discharge Monitoring Program is presented in Figure 3-4.

**Figure 3-4
MS4 Outfall Monitoring Programs Diagram**





3.11.3 Highest and Focused Priority Water Quality Condition Monitoring

The San Diego WQIP and Coronado have identified one Focused Priority Water Quality Condition for this Permit term to comply with this requirement. The City, in collaboration with the Port of San Diego and the City of Imperial Beach, will evaluate and seek improvements in water quality conditions related to swimmable waters both on San Diego Bay-side (e.g., Tidelands Park) with the Port of San Diego and on the ocean-side along Coronado's Pacific Ocean beaches and south to Imperial Beach Pier in collaboration with the City of Imperial Beach. Specifically, the City will conduct or evaluate monitoring activities in conjunction with other agencies for bacterial levels at North Beach, Glorietta Bay and Del Sol Avenue.

The Focused Priority Water Quality Condition Monitoring is designed to answer management questions regarding Focused Priority Conditions. In addition to general permit-required monitoring, the City and other watershed Copermittees will monitor receiving waters and the MS4, where applicable, to provide data for assessment of progress toward the selected goals.

Additional information about this monitoring component is provided in the San Diego Bay WQIP MAP.

3.11.4 Other Monitoring Programs and TMDLs and Special Studies

The other numerous monitoring programs conducted in collaboration with the other Copermittees or parties in San Diego Bay Watershed or the San Diego region allows for the collection of comprehensive water quality observations, information and data to determine the effectiveness of this City JRMP and watershed-level activities and strategies. Examples of other monitoring efforts include:

- Long-Term Receiving Water Monitoring – for the San Diego Bay Watershed conducted at the Sweetwater River Mass Loading Station;
- Regional Monitoring Program Participation, including:
 - Southern California Stormwater Monitoring Coalition (SMC) Regional Monitoring;
 - Southern California Bight Monitoring (Bight '13);
 - Hydromodification Regional Monitoring Program; and
 - San Diego County Beach Water Quality (AB411) Monitoring;
- Sediment Quality Monitoring.

Additional monitoring programs include TMDL compliance monitoring, per Attachment E of the Permit, and monitoring selected by Copermittees to collect data for special studies. Additional monitoring addresses both watershed specific and regional goals, and include:



- San Diego Regional Reference Streams and Beaches Studies (Regional);
- San Diego Debris Special Study (Watershed);
- Jurisdictional Boundary Special Study for Metals (Watershed); and
- Riparian Area Special Study (Watershed).

The City of Coronado currently contributes to the San Diego Regional Reference Streams and Beaches Study for the San Diego Region since the results of the study will advance bacteria assessment and monitoring of swimmable waters that are vital to Coronado's goal in support of open and safe recreational beaches.

The City also participates in the monitoring efforts for the San Diego Bay Watershed at the Sweetwater River Mass Loading Station through the San Diego Bay WQIP MAP.

Additional and detailed information on all these monitoring components is provided in San Diego Bay WQIP MAP.

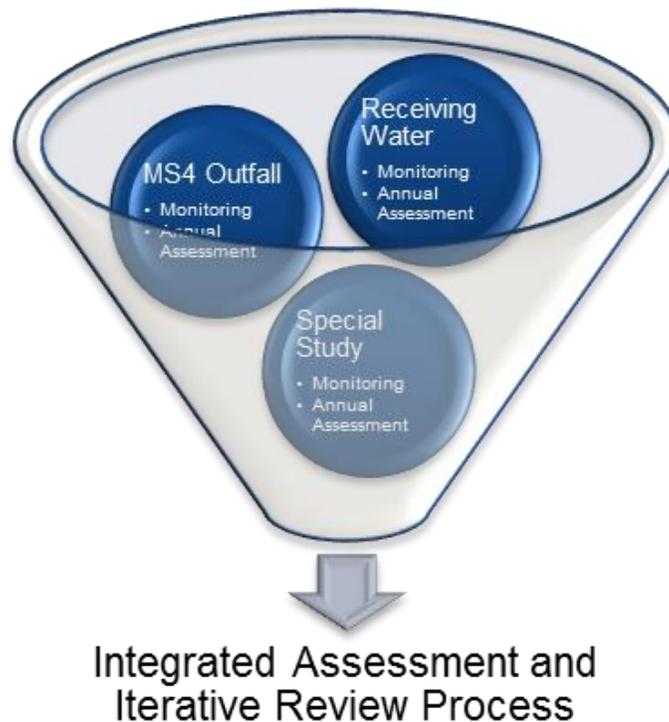
The completion of the sampling, testing, other monitoring activities, and reporting is performed as part of agreements or memoranda of understanding between the City and appropriate Copermittees and may be performed by contractors or City staff.

3.11.5 Comprehensive Monitoring and Integrated Assessment

The comprehensive monitoring program described above and in more detail in the San Diego Bay WQIP MAP leads to a comprehensive and integrated assessment of the water quality conditions, strategies and goals presented in this JRMP and the San Diego Bay WQIP. The result is the ability of the City and the Copermittees to implement a science-based iterative review process to modify and improve watershed and jurisdictional activities, including BMPs, to improve water quality as illustrate in Figure 3-5. The assessment program for the San Diego Bay Watershed is presented in the San Diego Bay WQIP MAP in Sections 6 through 10.



**Figure 3-5
Comprehensive Monitoring Illustration**



3.12 Annual Reporting

A comprehensive annual reporting plan to meet the requirements in the Permit is included in Section 9 of this JRMP.

The minimum annual reporting requirements listed in the Permit Appendix D-3, the Jurisdictional Runoff Management Program Annual Report Form (Annual Report Form) found in Storm Water Standards Manual, Section 8-A, for the IDDE component include:

Answers (yes or no) to the following question:

1. Has the Copermittee implemented a program to actively detect and eliminate illicit discharges and connections to its MS4 that complies with Order No. R9-2013-0001?

Reporting of the following data or statistics:

1. Number of non-storm water discharges reported by the public
2. Number of non-storm water discharges detected by City staff or contractors
3. Number of non-storm water discharges investigated by the City
4. Number of sources of non-storm water discharges identified



5. Number of non-storm water discharges eliminated
6. Number of sources of illicit discharges or connections identified
7. Number of illicit discharges or connections eliminated
8. Number of enforcement actions issued
9. Number of escalated enforcement actions issued

The Permit prescribes numerous and extensive measures that must be included in the IDDE program to investigate and eliminate illicit discharges to the MS4. One measure listed in Permit Provisions E.2.d.4. requires the City submit a summary of the non-storm water discharges and illicit discharges and connections investigated and eliminated as part of the San Diego Bay WQIP Annual Report. The data reported above, in the JRMP Annual Report, will also be included in the San Diego Bay WQIP Annual Report to satisfy the requirement.

The Permit is not clear on the definition nor does it provide an explanation of the field or entries to be submitted in the Annual Report Form. To assist City staff in consistently reporting data from year-to-year, the definitions or clarifications provided in Table 3-9 were developed as part of the JRMP preparation process¹⁵.

In order to meet the reporting requirements, the City has established a variety of computer-aided tools or programs that facilitate data tracking and management.

Essential data tracking, management and reporting tools for the IDDE Program component of the JRMP are:

1. Maintenance of public reporting of suspected illicit discharges or complaints in the Public Services Work Order System.
2. Documentation of inspection results by using the Storm Water General Inspection form and documenting results in the database.
3. Documentation of all enforcement actions issued.
4. Tracking and documentation of dry weather MS4 outfall monitoring efforts and any persistent discharges of non-storm water.

¹⁵ Note: these definitions were applied with the Annual Report form starting with FY 2013-14.



**Table 3-9
Annual Report Form Definitions for the IDDE Program**

Reporting Item	Definition or Clarification
Number of non-storm water discharges reported by the public	Inspection database (may be found under stormwater, wastewater, solid waste, street sweeping). Non-storm water discharges includes illicit discharges.
Number of non-storm water discharges detected by City staff or contractors	Inspection database (may be found under stormwater, wastewater, solid waste, street sweeping). Includes illicit discharges.
Number of non-storm water discharges investigated by the City	Inspection database (may be found under stormwater, wastewater, solid waste, street sweeping). Includes illicit discharges.
Number of sources of non-storm water discharges identified	Inspection database (may be found under stormwater, wastewater, solid waste, street sweeping). Includes illicit discharges.
Number of non-storm water discharges eliminated	Inspection database (may be found under stormwater, wastewater, solid waste, street sweeping). Includes illicit discharges.
Number of sources of illicit discharges or connections identified	Inspection database (may be found under stormwater, wastewater, solid waste, street sweeping). Includes illicit discharges.
Number of illicit discharges or connections eliminated	Inspection database (may be found under stormwater, wastewater, solid waste, street sweeping). Includes illicit discharges.
Number of enforcement actions issued	Inspections database. Enforcement action Notice of Violation (NOV) or higher.
Number of escalated enforcement actions issued	Inspections database. Any enforcement action issued for the same type of violation taken to the next level (e.g., Warning-> NOV or NOV -> stop work order/CDO, etc.)



4.1 Development Planning Requirements

Permit Requirement:	Provision E.3
Title:	Development Planning
Brief Description:	The City must use its land use and planning authorities to implement a development planning program. The BMP Design Manual describes the BMPs required by the City for all development projects.
Permit Page Number:	81 of 127

Permit Provision E.3 requires that the City use its land use and planning authorities to implement a development planning program in accordance with the jurisdictional strategies in the San Diego Bay Water Quality Improvement Plan (WQIP), as noted in Section 4.2 below, and that includes, at a minimum, the following requirements:

1. Best Management Practice (BMP) Requirements for All Development Projects (Permit Provision E.3.a);
2. BMP Requirements for Priority Development Projects (PDPs) (Permit Provision E.3.b);
3. BMP Performance Requirements for Structural/Storm Water Pollution Control BMPs (Permit Provision E.3.c).

The implementation of BMP requirements are fully described in the BMP Design Manual prepared by the San Diego Region Copermittees and customized for the City of Coronado as described in this section/document.

Municipal Code

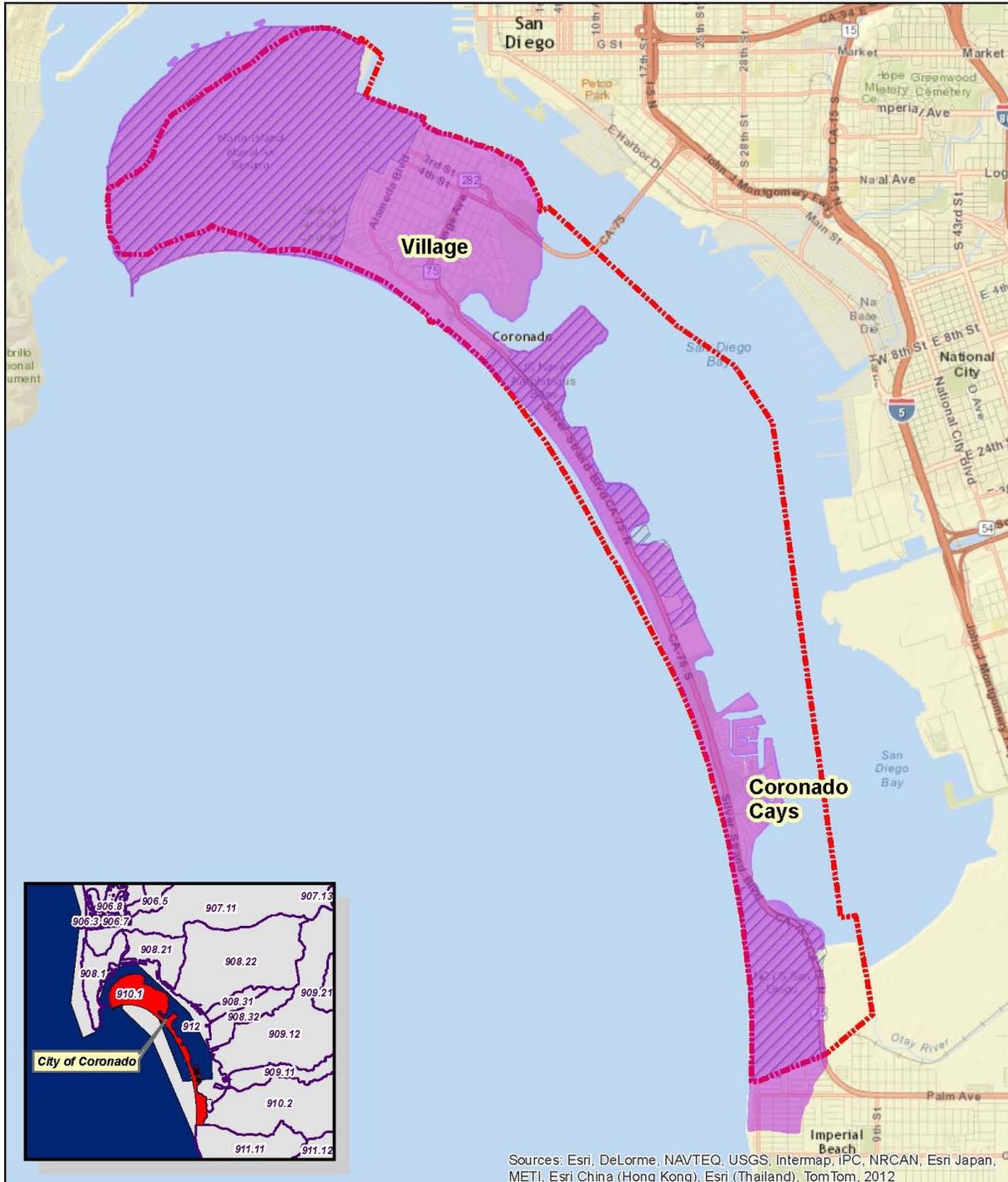
The City’s legal authority to require and enforce BMP requirements for development sites is provided in Coronado Municipal Code 61.04, 61.08 and 61.12.

4.2 Jurisdictional Strategies – San Diego Bay WQIP

The San Diego Bay WQIP describes the role and purpose of jurisdictional strategies in detail and may be consulted for a more comprehensive understanding of the selection of high priority or focused water quality conditions in the San Diego Bay watersheds. In summary, the San Diego Bay WQIP identified for the Coronado Hydrologic Sub-Area (HSA) No. 910.1 a focused priority condition or goal of swimmable waters (beaches) with bacteria as the targeted pollutant to address in order to achieve the goal. The City developed a list of jurisdictional strategies, as part of the San Diego Bay WQIP, which it will pursue to support the goal of swimmable waters. Figure 4-1 depicts the Coronado HSA in relationship to the City’s boundary.



Figure 4-1
City of Coronado Hydrologic Subarea 910.1



Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, IPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2012

Legend	
	Hydrologic Basin (910.1)
	City Boundary
	Military Owned

FIGURE 4-1
City of Coronado
Hydrologic Subarea (HSA) 910.1

1 inch = 6,750 feet

Compass Rose GIS 3/10/2015



4.2.1 Implementation of Jurisdictional Strategies

Coronado's jurisdictional strategies include activities associated with development planning and land use specifically targeting bacteria for swimmable water, if they have the potential to be present. For development sites that have the potential to contribute bacteria through permanent land use activities at the site, the City will verify the selection of BMPs and require, if needed, additional or specific post-construction BMPs to reduce or eliminate their potential impact on receiving waters (beaches). The full table of jurisdictional strategies is reproduced from the San Diego Bay WQIP and presented in the Storm Water Standards Manual, Section 1-C. In summary, the four jurisdictional strategies are:

1. Review projects for potential commercial sources of bacteria (e.g., covered trash enclosures for food establishments, pet services with exterior activities)
2. Staff training to target the identification of bacteria pollutant sources
3. Require projects within the Water Quality Sensitive Area (WQSA) to implement Low Impact Development (LID) and source control BMPs
4. Include in the BMP Design Manual, BMP requirements applicable to development projects with a higher potential to contribute bacteria

Of the four jurisdictional strategies, two apply directly to internal City operations and to implementation of the JRMP as described in Sections 4.2.2. The other two apply to development project proponents as described in Section 4.2.3.

4.2.2 Internal Jurisdictional Strategies

The first two internal jurisdictional strategies involve: 1) staff's review of projects to verify that potential commercial sources, specifically food establishments, address potential sources of bacteria through the implementation of source control BMPs and the integration of design features to minimize the potential for release of bacteria from outdoor areas, and 2) staff training to enhance the identification of bacteria pollutant sources. More information on potential sources of bacteria from sites is provided in Section 4.2.4.

4.2.3 External Jurisdictional Strategies

The two external jurisdictional strategies apply directly to projects. The first is to verify and require the integration of LID¹ and Source Control BMPs for all development projects (standard and priority) located within the WQSA and the second is to include the appropriate BMP

¹ LID is 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.



requirements in the BMP Design Manual to address bacteria sources from PDPs with higher potential to contribute bacteria to the Municipal Separate Storm Sewer Systems (MS4) and eventually receiving waters.

4.2.4 LID and Source Control BMPs for Potential Pollutant Sources – Bacteria

The San Diego Bay WQIP provides general guidance on the potential sources of bacteria based on the development type or category. Table 4-1 has been incorporated (with minor modifications and deletion of the types of facilities not found in Coronado) from Appendix G of the San Diego Bay WQIP and provides a general inventory of the types of facilities and potential pollutant types. The table shows the facilities known to be present in the City of Coronado (from the 2015 inventory) in rows shaded in blue and compares them to the potential for each of the pollutants. The bacteria/pathogen column shows Likely (L) sources for three types of land use or facility activities that have the highest potential to contribute bacteria or pathogens to storm water or urban runoff: 1) animal care facilities and related operations, 2) food establishments, and 3) residential areas. The “L” cells are highlighted in yellow for these three facility types.

Table 4-1
Pollutant Generating Sources – 910.1 Coronado Hydrologic Subarea
(Based on and edited from San Diego Bay WQIP Table G-8)*

Inventory Sites/Facilities**	Pollutant Source Loading Potential***							
	Heavy Metals	Organics	Oil & Grease	Sediment	Pesticides	Nutrients	Gross Pollutants	Bacteria/Pathogens
Animal	N	L	UL	L	UK	L	UK	L
Automotive	L	L	L	UL	UL	UK	L	UL
Contractor	UL	UL	UL	L	UL	UL	L	UL
Food Establishment	N	L	L	UL	UK	UK	L	L
Equipment	L	L	L	UL	UL	UK	L	UL
General Retail	UL	UL	UL	L	UL	UL	L	UL
Municipal	L	L	L	L	UK	UK	UK	UL
Construction	UL	UL	UL	L	UL	UL	L	UL
Residential	L	L	L	L	L	L	UK	L

*Non-applicable categories deleted (e.g., General Industrial). Prepared based on the WURMP Copermittees FY 2012 JURMP Annual Reports.

**Other sources are not reported in this table including: Land Development and Non-inventoried Businesses

***Pollutant Source Loading Potential taken from BLTEA 2005 and LTEA 2011; N = None, UK = Unknown, UL = Unlikely, L = Likely

None (N) includes sources with zero identified pollutant generating activities and low discharge potential.

Unknown (UK) includes sources with one or more identified pollutant generating activities, but very low discharge potential.

Unlikely (UL) includes sources with no pollutant generating activities, but high discharge potential, or sources with moderate discharge potential and one or more pollutant generating activities.

Likely (L) includes sources with high discharge potential and identified pollutant generating activities.



4.3 Post-Construction BMP Requirements – BMP Design Manual

To meet the requirements in Permit Provision E.3, the City adopted the Countywide BMP Design Manual and customized it to the unique City of Coronado requirements and development conditions to:

1. Provide streamlined storm water compliance guidance for the development community and staff, and
2. Integrate jurisdictional strategies that address the focused priority water quality condition: swimmable waters, and bacteria sources as included in the San Diego Bay WQIP.

The BMP Design Manual outlines all the storm water and BMP requirements for all development projects. Development and redevelopment projects are classified as standard or priority. The City has a category of projects that are not considered development and are exempt from the post-construction BMP requirements as outlined in Section 4.3.1.

BMP Design Manual

The City's storm water and BMP requirements applicable to all development projects and priority development projects are found in the BMP Design Manual on the City's website and in the Storm Water Standards Manual (Section 4-B). Specific details, design standards, and procedures are found in the City's BMP Design Manual.

Reproduced from the BMP Design Manual, Table 4-2 provides an overview of the requirements for standard projects and PDPs. The following sections also provide an overview of the Permit requirements, and the resources to comply are found in the BMP Design Manual (Storm Water Standards Manual, Section 4-B).



**Table 4-2
Applicability of BMP Design Manual Sections by Project Type**

	Project Development Process	Source Control and Site Design	Structural/Storm Water Pollution Control	Structural Hydromodification Management
BMP Design Manual Location	<i>Chapters 3 and 8</i>	<i>Section 2.1 and Chapter 4</i>	<i>Section 2.2 and Chapter 5 and 7</i>	<i>Section 2.3, 2.4 and Chapter 6 and 7</i>
Project Type				
Not a Development or Redevelopment Project (Exempt)	The requirements of the BMP Design Manual do not apply.			
Standard Project	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	NA	NA*
Priority Development Project (PDP)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	NA*

*All development projects in the City of Coronado are exempt from Structural Hydromodification Management BMPs, refer to Section 4.3.7.

The BMP Design Manual submittal date to the Water Board is June 27, 2015. It goes into effect and must be implemented by the City within 180 days of its completion date or December 24, 2015 (Permit Provision E.3.d).

4.3.1 Exempt Projects – Not Considered Development Projects

Consistent with the BMP Design Manual, Section 1.3, certain minor projects are not defined as development. Instead they are projects that require minor building permits that generally involve interior work within a structure, or that involve exterior work that does not disturb underlying soil, or increase or change the imperviousness of the existing project site footprint. Table 4-3 lists the types of projects that are generally considered exempt from post-construction BMPs and not subject to the BMP Design Manual. The City may find that certain projects which are generally considered exempt require a review and are subject to post-construction BMPs based on the project type, location, discharge conditions and receiving water quality.



**Table 4-3
Applicability of Post-Construction BMPs by Building Project Type**

Do permanent storm water requirements apply to your project?
Requirements DO NOT apply to:
<p>Replacement of impervious surfaces that are part of a routine maintenance activity, such as:</p> <ul style="list-style-type: none"> • Replacing roof material on an existing building • Rebuilding a structure to original design after damage from earthquake, fire or similar disasters • Restoring pavement or other surface materials affected by trenches from utility work • Resurfacing existing roads and parking lots, including slurry, overlay and restriping • Routinely replacing damaged pavement, including full depth replacement, if the sole purpose is to repair the damage • Constructing new sidewalks, pedestrian ramps or bike lanes on existing roads (within existing street right-of-way) • Restoring a historic building to its original historic design <p>Repairs or improvements to an existing building or structure that do not alter the size, such as:</p> <ul style="list-style-type: none"> • Plumbing, electrical and HVAC work • Interior alterations including major interior remodels and tenant build-out within an existing commercial building • Exterior alterations that do not change the general dimensions and structural framing of the building (does not include building additions or projects where the existing building is demolished)

4.3.2 Summary of BMP Requirements for All Development Projects

The Permit (Provision E.3.a.) requires the City to prescribe BMP requirements during the planning process and prior to project approval and issuance of local permits (e.g., building permits, demolition permits, miscellaneous permits) to **all development projects** regardless of project type or size. The following sections describe the post-construction BMP requirements that apply to standard projects and PDPs as outlined in the BMP Design Manual.

4.3.2.1 Source Control BMP Requirements

Source Control BMPs avoid and reduce pollutants in storm water runoff. Everyday activities, such as recycling, trash disposal, and irrigation, generate pollutants that have the potential to drain to the City’s MS4. Source Control BMPs are defined as an activity that reduces the potential for storm water runoff to come into contact with pollutants. An activity or BMP can include an

BMP Design Manual

Source Control BMPs Requirements are introduced in Section 2.1 and in detail in Section 4.2 of the BMP Design Manual.



administrative procedure, design of a structural facility, usage of alternative materials, an operational standard, or maintenance and inspection of an area.

The following Source Control BMPs must be implemented at **all development projects** (Permit Provision E.3.a.(2)) where applicable and feasible:

1. Prevent illicit discharges into the MS4 (described in JRMP Section 3);
2. Storm drain system stenciling or signage;
3. Protection of outdoor material storage areas from rainfall, run-on, runoff, and wind dispersal;
4. Protection of materials stored in outdoor work areas from rainfall, run-on, runoff, and wind dispersal;
5. Protection of trash storage areas from rainfall, run-on, runoff, and wind dispersal; and
6. Other site-specific BMPs to minimize pollutant generation as required by the City.

4.3.2.2 Site Design BMP Requirements

Site Design BMPs (referred to as LID BMPs in the Permit) are intended to reduce the rate and volume of storm water runoff and associated pollutant loads. Site design BMPs include practices that reduce the rate and/or volume of storm water runoff by minimizing surface soil compaction, reducing impervious surfaces (see Figure 4-2), and/or providing flow pathways that are “disconnected” from the storm drain system (see Figure 4-3), such as routing flow over pervious surfaces. Site design BMPs may incorporate interception, storage, evaporation, evapotranspiration, infiltration, and/or filtration processes to retain and/or treat pollutants in storm water before it is discharged from a site.

BMP Design Manual

Site Design BMPs Requirements are introduced in Section 2.1 and detailed in Section 4.3 of the BMP Design Manual.



Figure 4-2
Priority Development Projects – Permeable Sidewalk Design



Figure 4-3
Priority Development Projects – Typical Parking Lot with Site Design BMPs





The following Site Design BMPs must be implemented at **all development projects** (Permit Provision E.3.a.(3)) where applicable and feasible:

1. Maintenance or restoration of natural storage reservoirs and drainage corridors (including topographic depressions, areas of permeable soils, natural swales, and ephemeral and intermittent streams);
2. Buffer zones for natural water bodies (where buffer zones are technically infeasible, require project applicant to include other buffers, such as trees, access restrictions, etc.);
3. Conservation of natural areas within the project footprint, including existing trees, other vegetation, and soils;
4. Construction of streets, sidewalks, or parking lot aisles to the minimum widths necessary, provided public safety is not compromised;
5. Minimization of the impervious footprint of the project;
6. Minimization of soil compaction to landscaped areas;
7. Disconnection of impervious surfaces through distributed pervious areas;
8. Landscaped or other pervious areas designed and constructed to effectively receive and infiltrate, retain and/or treat runoff from impervious areas, prior to discharging to the MS4;
9. Small collection strategies located at, or as close as possible to, the source (i.e. the point where storm water initially meets the ground) to minimize the transport of runoff and pollutants to the MS4 and receiving waters;
10. Use of permeable materials for projects with low traffic areas and appropriate soil conditions;
11. Landscaping with native or drought tolerant species; and
12. Harvesting and using precipitation.

4.3.3 Summary of BMP Requirements for Priority Development Projects

The Permit (Provision E.3.c) requires that projects triggering the PDP definition, implement specific requirements, including the Source Control and Site Design BMPs described in Section 4.3.1 above and Storm Water Pollutant Control BMPs² that meet specific performance or design criteria listed in Section 4.3.4.

² The Permit defines Structural BMPs as both Storm Water Pollutant Control BMPs and Hydromodification Management BMPs. The City of Coronado does not have to require development projects to implement the Hydromodification Management BMPs required in Permit Provision E.3.c.(2) since there are no hydromodification requirements that apply.



4.3.3.1 *Priority Development Project Definition*

PDPs are defined in Permit Provision E.3.b as follows:

BMP Design Manual

Priority Development Project definitions and requirements are found in Section 1.4, and Chapters 2 and 5.

1. New development projects that create 10,000 square feet or more of impervious surfaces (collectively over the entire project site). This includes commercial, industrial, residential, mixed-use, and public development projects on public or private land.
2. Redevelopment projects that create³ and/or replace 5,000 square feet or more of impervious surface (collectively over the entire project site on an existing site of 10,000 square feet or more of impervious surfaces). This includes commercial, industrial, residential, mixed-use, and public development projects on public or private land.⁴
3. New and redevelopment projects that create 5,000 square feet or more of impervious surface (collectively over the entire project site), and support one or more of the following uses:
 - a. Restaurants. This category is defined as a facility that sells prepared foods and drinks for consumption, including stationary lunch counters and refreshment stands selling prepared foods and drinks for immediate consumption (Standard Industrial Classification (SIC) code 5812).
 - b. Hillside development projects. This category includes development on any natural slope that is twenty-five percent or greater. Note: known not to apply in Coronado.
 - c. Parking lots. This category is defined as a land area or facility for the temporary parking or storage of motor vehicles used personally, for business, or for commerce.
 - d. Streets, roads, highways, freeways, and driveways. This category is defined as any paved impervious surface used for the transportation of automobiles, trucks, motorcycles, and other vehicles.
4. New or redevelopment projects that create or replace 2,500 square feet or more of impervious surface (collectively over the entire project site), and discharging directly to an Environmentally Sensitive Area (ESA). "Discharging directly to" includes flow that is conveyed overland a distance of 200 feet or less from the project to the ESA, or

³ The total area used in the calculation includes those that are added or created.

⁴ In addition, redevelopment projects are subject to the special considerations listed in Section 4.3.3.2- The 50% Rule.



conveyed in a pipe or open channel any distance as an isolated flow from the project to the ESA (i.e. not commingled with flows from adjacent lands). The City's ESA is known as WQSA and is shown in Figures 4-4, 4-5, and 4-6. The City's BMP Design Manual includes a listing of all the parcels/properties that have the potential to trigger this PDP category.

5. New development projects that support one or more of the following uses:
 - a. Automotive repair shops. This category is defined as a facility that is categorized in any one of the following SIC codes: 5013, 5014, 5541, 7532-7534, or 7536-7539.
 - b. Retail gasoline outlets. This category includes retail gasoline outlets that meet the following criteria: 1) 5,000 square feet or more, or 2) projected average daily traffic of 100 or more vehicles per day.
6. New or redevelopment projects that result in the disturbance of one or more acres of land and are expected to generate pollutants post construction. This is rarely triggered in the City of Coronado.

Figure 4-4
City of Coronado WQSA Overview





**Figure 4-5
Coronado Village WQSA Overview**



**Figure 4-6
Coronado Cays WQSA Overview**





4.3.3.2 *Special Considerations for Priority Redevelopment Projects (The "50% Rule")*

The Storm Water Pollutant Control BMP design and performance requirements for PDPs that are considered redevelopment of existing sites are applicable as required (Permit Provision E.3.b.(2)) and depend on the percentage of impervious surface created or replaced compared to the surface area of the previously existing development (prior to redevelopment).

The application of the requirements has come to be known as "The 50% Rule" due to the following criteria:

1. If the redevelopment results in the creation or replacement of impervious surface in an amount of less than fifty percent of the surface area of the previously existing development, then the Storm Water Pollutant Control BMP performance requirements apply only to the creation or replacement of impervious surface, and not the entire development.
2. If the redevelopment results in the creation or replacement of impervious surface in an amount of more than fifty percent of the surface area of the previously existing development, then the Storm Water Pollutant Control BMP performance requirements apply to the entire development.

BMP Design Manual

The 50% Rule for Redevelopment Priority Development Projects is found in Section 1.7 of the BMP Design Manual.

4.3.3.3 *Priority Development Project Exemptions*

The City is granted the discretion to exempt certain projects from the definition of PDP (Permit Provision E.3.b.(3)) for the following:

1. New or retrofit paved sidewalks, bicycle lanes, or trails that meet the following criteria:
 - a. Designed and constructed to direct storm water runoff to adjacent vegetated areas, or other non-erodible permeable areas; OR
 - b. Designed and constructed to be hydraulically disconnected from paved streets or roads; OR
 - c. Designed and constructed with permeable pavements or surfaces in accordance with USEPA Green Streets guidance.
2. Retrofitting or redevelopment of existing paved alleys, streets or roads that are designed and constructed in accordance with the USEPA Green Streets guidance.

BMP Design Manual

These exemptions are covered in more detail in Section 1.4.3 of the BMP Design Manual, if applicable.



4.3.4 Storm Water Pollutant Control BMP Requirements for Priority Development Projects

PDPs are required to meet performance and design requirements per Permit Provision E.3.c for all onsite (structural) control of pollutants in storm water discharged from the developed project site upon completion.

The performance and design requirements are presented with a hierarchy for the types of Storm Water Pollutant Control BMPs a project proponent may use to meet compliance:

BMP Design Manual

An overview of the Storm Water Pollutant Control BMP requirements is found in Section 2.2 and detailed guidance in Section 5 of the BMP Design Manual.

1. Storm Water Pollutant Control BMPs must be designed to retain (i.e. 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 equivalent to 0.55 inches in Coronado);
2. If the City confirms that implementing Storm Water Pollutant Control BMPs to retain the full design capture volume onsite for a PDP is not technically feasible, then the City may allow the PDP to utilize biofiltration BMPs. Biofiltration BMPs must be designed to have an appropriate hydraulic loading rate to maximize storm water retention and pollutant removal, as well as to prevent erosion, scour, and channeling within the BMP, and must be sized to:
 - a. Treat 1.5 times the design capture volume not reliably retained onsite, or
 - b. Treat the design capture volume not reliably retained onsite with a flow-thru design that has a total volume, including pore spaces and pre-filter detention volume, sized to hold at least 0.75 times the portion of the design capture volume not reliably retained onsite.
3. If the City confirms that biofiltration is not technically feasible, then the City may allow the PDP to utilize flow-thru treatment control BMPs to treat runoff leaving the site, and mitigate for the design capture volume not reliably retained onsite through alternative compliance (as described in Section 4.3.5). Flow thru treatment control BMPs must be sized and designed to:
 - a. Remove pollutants from storm water to the Maximum Extent Practicable (MEP);
 - b. Filter or treat either: 1) the maximum flow rate of runoff produced from a rainfall intensity of 0.2 inch of rainfall per hour, for each hour of a storm event, or 2) the maximum flow rate of runoff produced by the 85th percentile hourly rainfall



intensity (for each hour of a storm event), as determined from the local historical rainfall record, multiplied by a factor of two; and

- c. Be ranked with high or medium pollutant removal efficiency for the PDP's most significant pollutants of concern. Flow-thru treatment control BMPs with a low removal efficiency ranking must only be approved by a City when a feasibility analysis has been conducted which exhibits that implementation of flow-thru treatment control BMPs with high or medium removal efficiency rankings are infeasible for a PDP or portion of a PDP.

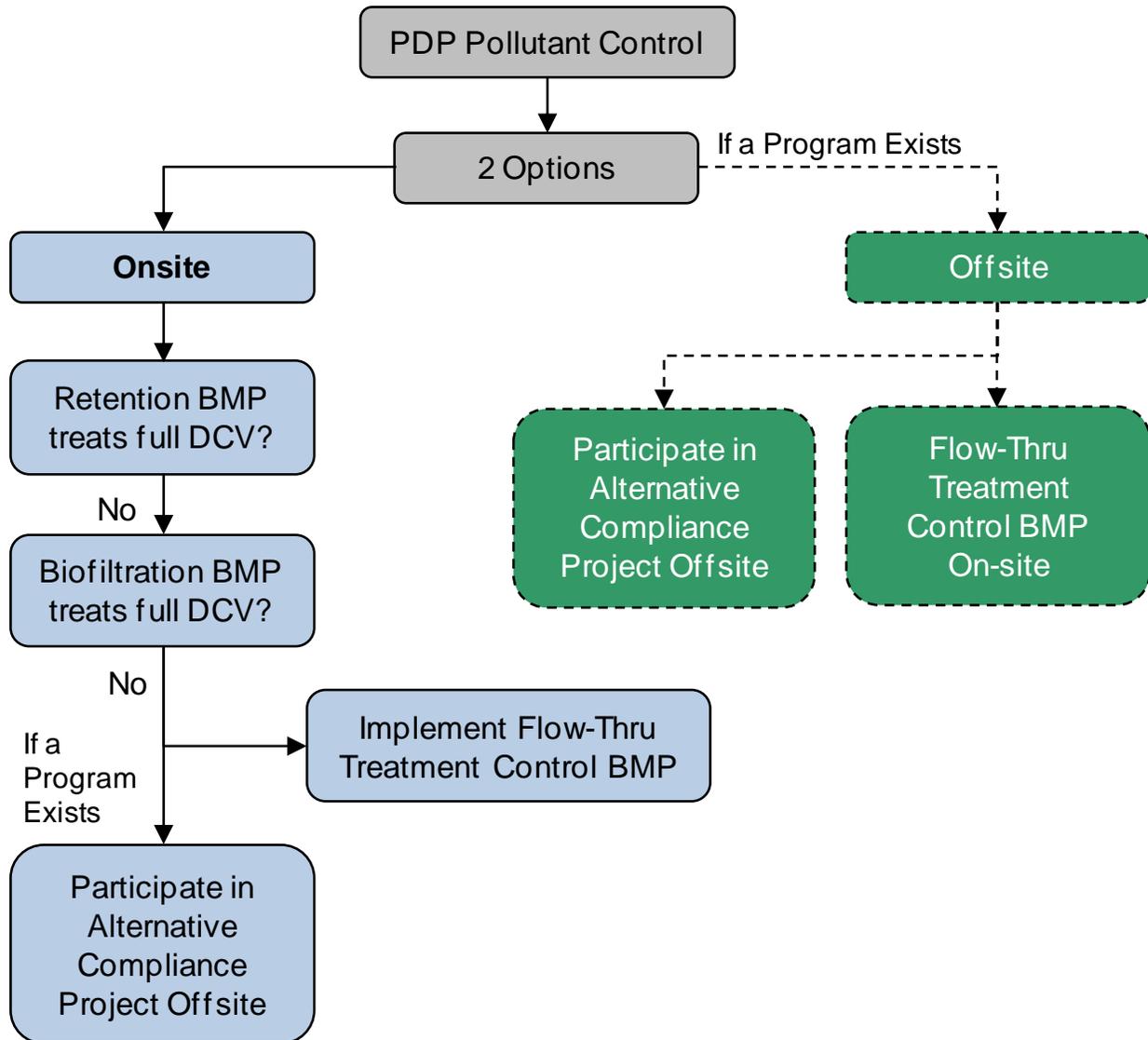
4.3.5 Alternative Compliance Program

Permit Provision E.3.c.(1)(b) allows PDPs to seek compliance with Storm Water Pollution Control BMP performance requirements by mitigating for the portion of the design capture volume not retained on-site using an offsite BMP with approval from the City. The Permit requires that the untreated portion of the design capture volume be treated using a flow-thru treatment control BMP that is sized in accordance with the criteria listed in Section 4.3.4, bullet 3 above.

Figure 4-7 provides an overview of two options, onsite and offsite, for PDPs to comply with Storm Water Pollutant Control requirements. The offsite, alternative compliance program is entirely optional and subject to development and implementation by the City.



**Figure 4-7
Priority Development Projects and
Alternative Compliance Program Option**



The Alternative Compliance Program in Permit Provision (E.3.c.(3)) provides the criteria for implementation of this option to comply with pollutant treatment requirements.

4.3.5.1 Alternative Compliance Program Requirements

In order for the City to implement a compliant Alternative Compliance Program the San Diego Bay WQIP must include the optional Watershed Management Area Analysis described in Provision B.3.b.(4). The Alternative Compliance Program is available to a PDP only if:



1. The City has established an Alternative Compliance Program; and
2. The PDP applicant enters into a voluntary agreement with the City authorizing this arrangement.

In addition to the voluntary agreement, relief from implementing storm water pollution control BMPs onsite (on the development project site) may be authorized by the City if the following apply or are available with the following conditions:

1. The project applicant funds, or contributes funds to, or implements a candidate project identified in the Watershed Management Area Analysis;
2. The project applicant proposes and funds, or contributes funds to, or implements an alternative compliance project;
3. The City must develop and implement an in-lieu fee structure, individually or with other Copermittees and/or entities, as a means for designing, developing, constructing and maintaining the offsite alternative compliance project(s). The in-lieu fee is transferred to the City (for public projects) or to an escrow account (for private projects) prior to the construction of the PDP;
4. The City may develop and implement an alternative compliance water quality credit system option, individually or with other Copermittees and/or entities, provided that such a credit system clearly exhibits that it will not allow discharges from PDPs to cause or contribute to a net impact over and above the impact caused by projects meeting the onsite storm water pollutant control BMP performance requirements (Section 4.3.3 above). Any credit system that a City chooses to implement must be submitted to the San Diego Water Board Executive Officer for review and acceptance as part of the San Diego Bay WQIP.

The City Alternative Compliance Plan and implementation methodology are provided, if available, in the Storm Water Standards Manual in Section 4-D.

4.3.6 Long-Term Storm Water Pollutant Control BMP Maintenance

The Permit requires that the City mandate that all project applicants submit proof of long-term, ongoing maintenance of all storm water pollution control BMPs (Permit Provision E.3.c.(4)). The City's procedures for review and approval of maintenance requirements for PDPs with Storm Water Pollutant Control BMPs are described in Section 4.4.2.

BMP Design Manual

The Long-Term Storm Water Pollutant Control BMP Maintenance Requirements are found in Section 7 of the BMP Design Manual.



The minimum requirements for operation and maintenance of Storm Water Pollutant Control BMPs can be found in Section 7 of the BMP Design Manual.

4.3.7 Infiltration and Groundwater Protection Requirements

The Permit includes specific requirements for storm water pollution control BMPs designed to meet design capture volume treatment through infiltration. Infiltration of storm water has multiple benefits but also requires measures to protect groundwater quality.

In Coronado, it is unlikely or not anticipated that large, centralized, infiltration devices (such as large infiltration trenches and infiltration basins) will be installed to meet the requirements for PDPs. Nevertheless, the Permit conditions for these types of BMPs are included in the City's JRMP for completeness and to offer insight into measures that may be applicable to even smaller, individual project infiltration devices, such as dry wells and infiltration pits, at the discretion of the City.

Per Permit Provision E.3.c.(5) infiltration-based Storm Water Pollutant Control BMPs must not cause or contribute to an exceedance of an applicable groundwater quality objective. At a minimum, infiltration BMPs must be in conformance with specific design criteria, unless the development project applicant demonstrates to the City that one or more of the specific design criteria are not necessary to protect groundwater quality. As noted above, these design criteria apply to large-scale infiltration BMPs and not to small infiltration systems dispersed throughout a development project.

Large-scale Infiltration Storm Water Pollutant Control BMP design criteria:

1. Runoff must undergo pretreatment, such as sedimentation or filtration, prior to infiltration;
2. Pollution prevention and source control BMPs must be implemented at a level appropriate to protect groundwater quality at sites where infiltration BMPs are to be used;
3. Infiltration BMPs must be adequately maintained to remove pollutants in storm water to the MEP;
4. The vertical distance from the base of any infiltration BMP to the seasonal high groundwater mark must be at least 10 feet. Where groundwater basins do not support beneficial uses, this vertical distance criteria may be reduced, provided groundwater quality is maintained;
5. The soil through which infiltration is to occur must have physical and chemical characteristics (e.g., appropriate cation exchange capacity, organic content, clay content, and infiltration rate) which are adequate for proper infiltration durations and treatment of runoff for the protection of groundwater beneficial uses;



6. Infiltration BMPs must not be used for areas of industrial or light industrial activity, and other high threat to water quality land uses and activities as designated by the City, unless source control BMPs to prevent exposure of high threat activities are implemented, or runoff from such activities is first treated or filtered to remove pollutants prior to infiltration; and
7. Infiltration BMPs must be located a minimum of 100 feet horizontally from any water supply wells.

The Permit (Provision E.3.c.5.(b)), allows the City to develop, individually or with other Copermittees, alternative mandatory design criteria to that listed above for infiltration BMPs which are designed to primarily function as centralized infiltration devices. Before implementing the alternative design criteria in the development planning process, the City, or City and Copermittee(s), must:

1. Notify the San Diego Water Board of the intent to implement the alternative design criteria submitted; and
2. Comply with any conditions set by the San Diego Water Board.

4.3.8 Hydromodification Management BMP Requirements in the City of Coronado

Permit Requirement:	Provision E.3.c.(2)
Title:	Development Planning
Brief Description:	<p>The Permit requires the implementation of Hydromodification Management BMPs for the control of post-project runoff conditions that may result in an increased potential for erosion, or degradation of habitat downstream of Priority Development Projects.</p> <p>The City of Coronado does not have the natural stream systems or other habitat and critical sediment yield areas that lead to the need for hydromodification management.</p> <p>The exemptions to Hydromodification Management BMPs are listed in Permit Provision E.3.c.(2)(d).</p>
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The City of Coronado is located on a peninsula that is part of San Diego Bay and the harbor. The topography is relatively flat with elevations ranging from sea level to 60 feet, and averaging 20 feet. The City does not own or maintain any streams, rivers or flood control channels. The City's storm water conveyance system is primarily composed of surface flows along streets and street gutters, and underground pipes. Storm drain outfalls are located along the perimeter of the City's boundaries – those that are not federal government properties – and discharge to the San Diego Bay or the Pacific Ocean. The majority of the City's storm water outfalls, including



major outfalls (those greater than 36 inches in diameter), are equipped with low flow urban runoff and first flush storm water diversion systems to the sanitary sewer. The sanitary sewer is also owned, operated and maintained by the City.

These conditions allow the City to exempt development projects from the Permit's requirements for Hydromodification Management BMPs. The exemptions listed in Permit Provision E.3.c.(2)(d) are found in Table 4-4 with the findings as they apply to the City of Coronado.

**Table 4-4
Hydromodification Management BMP Exemptions**

Condition, As May Apply to Coronado	Findings
1. Existing underground storm drains discharge directly to an enclosed embayment, or the Pacific Ocean	Applies to the entirety of the City's MS4 that discharges to San Diego Bay and the Pacific Ocean
2. Conveyance channels whose bed and bank are concrete lined all the way from the point of discharge to enclosed embayments, or the Pacific Ocean	Coronado does not have conveyance channels. The only open conveyances are concrete ditches or swales with minor width and depth.
3. An area identified by the City as appropriate for an exemption by the optional Watershed Management Area Analysis incorporated into the San Diego Bay WQIP	Not applicable

4.4 Implementation of Post-Construction BMP Requirements

Permit Requirement:	Provision E.3.e
Title:	Development Planning
Brief Description:	The City must implement a program to require and verify the selection, design, construction, operation and maintenance of storm water pollutant control BMPs for Priority Development Projects it approves and permits.
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Permit Provision E.3.e requires that the City implement a program that requires and confirms storm water pollutant control BMPs on all PDPs are designed, constructed, and maintained to remove pollutants in storm water to the MEP. At minimum, the program must consider the following:

1. A Storm Water Pollutant Control BMP Approval and Verification process;
2. A PDP Inventory and Prioritization System; and
3. A Storm Water Pollutant Control BMP Maintenance Verification and Inspection system.



In the following sections, the City’s Departmental Responsibilities are specified and include the processes or systems to comply with these requirements.

4.4.1 Departmental Responsibilities

Permit Requirement:	Provision E.3.e.(1)(b)
Title:	Development Planning
Brief Description:	The City must identify the roles and responsibilities of its various municipal departments in implementing structural/storm water pollution control BMP requirements, including each stage of a project from application review to approval (through BMP maintenance and inspections).
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An overview of the City’s organization structure and roles and responsibilities is provided in Section 1.4 of this JRMP. Two City departments: 1) Community Development, and 2) Public Services and Engineering, have the majority of the responsibility for implementation of this Development Planning component of the Permit. The Community Development Department has a key role in land use planning and development permitting, and Public Services and Engineering is instrumental in the overall implementation of the operation and management of the storm water program for the City.

The following sections provide the details of the roles and responsibilities related to this component. For this and all other JRMP components, City departments are expected to work cooperatively to meet Permit requirements and compliance.

4.4.1.1 Program Implementation Overview

The City of Coronado is a small tourism-oriented suburban community. Due to the City’s unique character, the implementation of development planning requirements is limited in scope compared to neighboring agencies. The following development characteristics are typical for Coronado:

- Development on undisturbed land is rare if at all applicable.
- The City is composed primarily of residential land use (excluding neighboring federal properties).
- Redevelopment of residential properties constitutes the majority of planning and building activities.
- Commercial redevelopment is made-up primarily of restaurants, hotels, retail businesses, and a few other service businesses. Industrial facilities do not exist in Coronado.



PDPs are generally identified as single or multi-family residential redevelopment, or restaurants over 5,000 square feet of new or replaced impervious area. The other common trigger is projects discharging directly to the City's designated WQSA.

4.4.1.2 Community Development

The Community Development Department is committed to providing planning and building services to the public. This department provides staff support to the Planning Commission, Design Review Commission, and Historic Resource Commission.

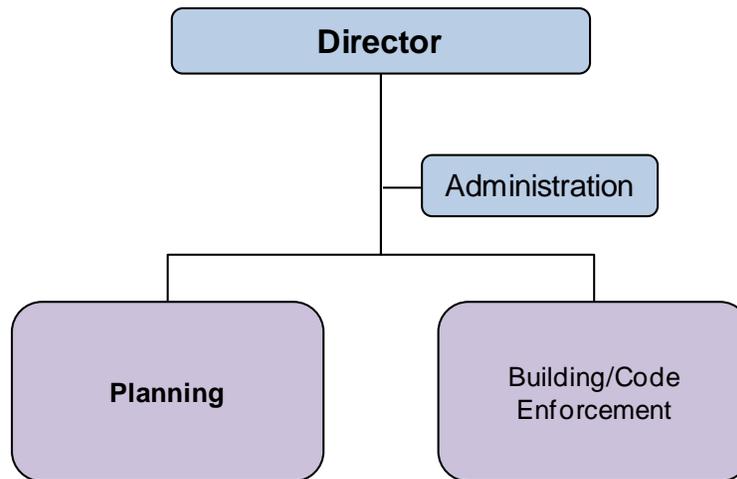
The Community Development Department is responsible for management of a variety of programs and activities including:

1. General Plan, Local Coastal Program, and Zoning Ordinance amendments;
2. Processing applications for Historic Designation, Historic Alteration Permits, and Mills Act agreements;
3. Processing of applications for Special Use Permits, Variances, Coastal Permits, and Parking Plans;
4. Processing of applications for Subdivision Maps, Lot Line Adjustments, and Lot Consolidations;
5. Processing of applications for Design Review for Commercial and Multi-Family development and signs;
6. Environmental review of projects in accordance with the California Environmental Quality Act (CEQA);
7. Building construction plan check, permit issuance, and inspections;
8. Zoning and Building Code Enforcement;
9. Public information including planning and building records.

The Department's general organizational chart is provided in Figure 4-8.



**Figure 4-8
Community Development Organizational Chart**



The Building Services Division's mission is multi-dimensional with the following roles and responsibilities:

- Ensure that all structures in Coronado, both commercial and residential, conform with the current construction standards of the State of California Building Codes;
- Ensure that all structures in Coronado, both commercial and residential, conform with the health and safety standards of the State of California Building Codes; and
- Ensure that all citizens of Coronado are provided with the information they need to prepare and submit plans and document to receive permits for their construction projects.

With the exception of Capital Improvement Projects (CIPs) undertaken by the City, development activities, as defined by the Permit, are generally initiated through the Building Services Division counter that is part of Community Development. The role of the Building Services Division is instrumental to the implementation of land use requirements of the municipal storm water management program and compliance as required by the Permit. The Building Services Division counter is supported by the Public Services and Engineering Department to administer and require project compliance with Permit provisions and this JRMP.

The Building Services Division counter is where initial information, forms, and submittals for building and other permits take place. The Building Services Division counter acts as the central location for receipt of permit applications, building plans, and other documentation or reports that are processed by the City. Community Development Department divisions as well as other City Departments work jointly to address all regulatory requirements applicable to land use, land



development, and construction activities through the issuance of the required approvals and permits.

The primary role of the Building Services Division as it relates to implementation of the JRMP is to receive project applications and forms, log them in the City's development and building permit tracking system (TRACKiT) and assign review and approval responsibilities to the various departments or divisions based on the type of development and required permits. A more detailed description of the development project review and approval process is provided in Section 4.4.2 below.

4.4.1.3 Public Services and Engineering

The Public Services and Engineering Department is composed of two divisions that have important and distinct roles and responsibilities associated with the implementation of the JRMP.

Public Services

Public Services mission statement reads as follows:

“The mission of the Public Services is to maintain and enhance the City's physical infrastructure and to provide the highest level of maintenance to the City's beaches, parks, facilities and fleet in the most cost effective manner. Public Services also manages Project Development by providing the planning, design, financial, contractual and construction management services necessary for development of the City's major capital improvement projects.”

Public Services is responsible for a wide range of services, including:

1. Street, parks, and beach maintenance;
2. Graffiti removal on public property;
3. Parkway tree trimming;
4. Sewer main line cleaning and maintenance;
5. Storm water pollution prevention – storm drain line cleaning and maintenance; and
6. Household hazardous waste, trash and recycling.

The Utilities Division of the department manages:

1. All storm water operations, including cleaning, maintenance, and minor repairs of the City's MS4; and
2. Administration of the storm water program.

Functions related to the Development Planning component of the JRMP that are managed by the Utilities Division include:



1. Development project review for compliance with the Permit and the BMP Design Manual;
2. Verification of project classification as exempt, standard, or PDP;
3. Approval of all post-construction BMPs (source control, LID, and storm water pollutant control);
4. Verification of the construction of post-construction BMPs as approved by the City; and
5. Inspection of owner operation and maintenance of post-construction BMPs.

The Utilities Division works closely with the Building Services Division to administer the Development Planning component of the JRMP. The Public Services Department functional organizational chart is provided in Figure 4-9. The primary functions of the department include storm water operations and storm water program administration. Numerous other functions, such as engineering support, street sweeping operations, and streets operations, are part of the storm water program in a secondary role through the implementation of activities and operations that prevent or mitigate pollution to the MS4 and/or receiving waters.

Engineering

Engineering is responsible for management of a variety of programs, including CIPs, as described below:

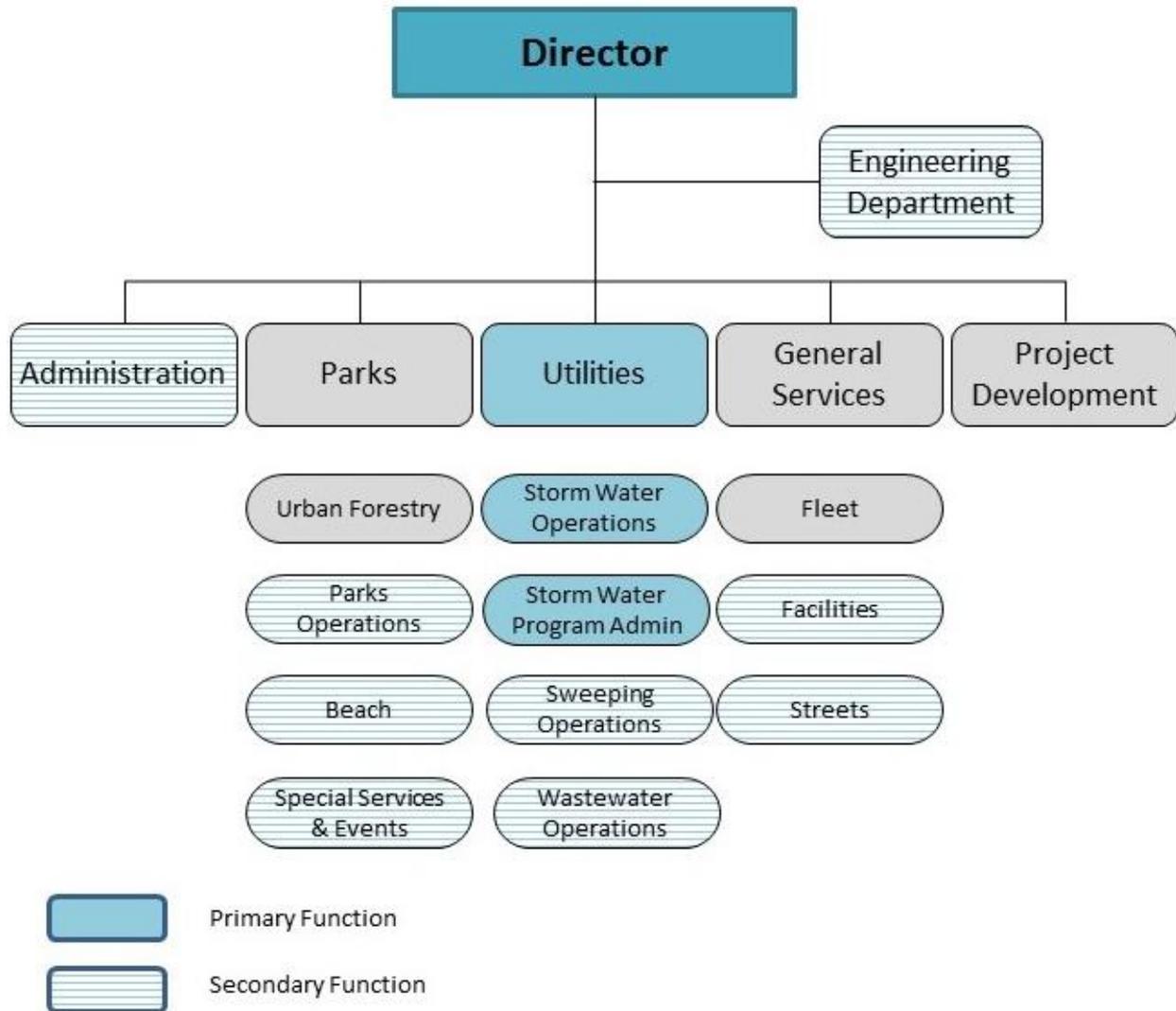
- General Engineering Services. Provides right-of-way and encroachment permits, maintains all parcel and subdivision maps, and records of surveys. Acts as the plan holder for all street, sewer, storm drain, facilities, and miscellaneous improvements.
- Traffic Engineering. Provides objective studies of all traffic safety issues based on traffic warrants, traffic manuals, and other applicable standards.
- Street Maintenance and Improvement Program. Provides for the planning, design, repair, and maintenance of the 40 miles that comprise the public street system.
- Storm Drainage Improvement Program. Provides for the repair and upgrading of the City storm drainage system while ensuring compliance with the National Pollutant Discharge Elimination System (NPDES) regulations.
- Wastewater Utility Improvement Program. Provides for the major repairs and improvements to the sanitary sewer system which consists of 43 miles of sewer mains, twelve pump stations, and the Transbay pipeline.

In their role as the City Engineer, they provide technical guidance and expertise on a variety of City projects, and support the Utilities Division and Community Development Department with



the implementation of the review services and permit approvals related to this JRMP component.

**Figure 4-9
Public Services and Engineering Department
Functional Organizational Chart**



4.4.2 Development Project Review and Approval Process

The BMP Design Manual recommends early communication and coordination by the City with all development project applicants to avoid many of the common mistakes, misconceptions and assumptions about the Permit and JRMP requirements (see Introduction; page xii). The key to success is identifying and classifying projects while they are in the conceptual or planning stage to allow the most flexibility to comply with the requirements.



The development project review and approval process is utilized to communicate storm water post-construction BMP requirements as they apply to development and building permits issued by the City.

The City's forms and any applicable detailed operating procedures or standard operating procedures (SOPs) related to this JRMP section are found in the City's Storm Water Standards Manual that includes the BMP Design Manual.

These documents can be found on the City's website.

4.4.2.1 Development Permits, Approval and Conditions

Development permit applications (also known as discretionary permits) are processed for review and approval by the Community Development Department and may result in permits or other decisions that include conditions or requirements for the long-term management of storm water and runoff.

Permit Requirement:	Provision E.3.e.(1)
Title:	Structural BMP Approval and Verification Process
Brief Description:	The City must require that all Priority Development Project applications (e.g., development or building permits) that <u>have not</u> received prior lawful approval by the time the BMP Design Manual is updated on December 24, 2015 must implement BMPs to reduce pollutants to the MS4 and protect the beneficial uses of the receiving waters as specified in the BMP Design Manual.
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The inclusion of conditions at this early stage of development project planning is key to the success of the jurisdictional runoff management planning and compliance with the Development Planning component of the JRMP and the Permit.

The Community Development Department is the lead for the City in identifying projects that require conditioning to meet regulatory requirements, and notifying the owner(s) and/or developer(s). The Coronado Municipal Code specifies what types of development require discretionary approvals that can be granted subject to conditions. The Public Services and Engineering Department works with the Community Development Department to identify Permit and post-construction BMP requirements that project proponents have to implement to comply with the Permit. The initial planning stage is the best opportunity to identify the post-

BMP Design Manual

The definition of "Project" according to CEQA and other considerations can be found in Section 1.3 of the BMP Design Manual.



construction BMP requirements that must be included in the project in order to receive building permit approval at a future date. Since requirements vary based on the type, size, location, and other factors associated with the development project, it is important that during the development permit application review and approval process the following take place:

1. For certain development projects, a multi-departmental, pre-planning meeting to initiate the information exchange between the owner/developer and the City regarding the requirements for the project, including post-construction storm water and runoff management;
2. Participation by the Public Services and Engineering Department in the review of development permit applications to identify post-construction BMP requirements; and
3. Public Services and Engineering Department screening of standard conditions and preparation of any special conditions for the project site to be included in development permit(s).

Development permits subject to a CEQA review generally include:

1. Parcel and subdivision maps;
2. Coastal permits;
3. Parking permits;
4. Special use permits; and
5. Variances.

The Public Services and Engineering Department has in place standard conditions to be considered for all development permits. These standards are found in the BMP Design Manual (part of the City's Storm Water Standards Manual) and on the City's website.

One condition specifically addresses Permit Provision E.3.e.(1)(c) that requires the City to verify that appropriate easements and ownerships are recorded in public records to convey the requirement to continue to operate and maintain storm water pollution control BMPs that have been approved by the City during any change in ownership of the property or project site.

Building Permits

The City has an established building permit application process (also known as a "Plan Check") to identify projects that require the implementation of post-construction BMPs (and construction BMPs – addressed in JRMP Section 5) to meet the requirements of the Permit and the BMP Design Manual. All submittals for building permit applications, including demolition and miscellaneous permits, are processed through the Building Services Division counter.

Permit applications, also known as ministerial permits or approvals, may include the following types:



1. Building;
2. Engineering⁵;
3. Fire;
4. Miscellaneous (includes demolition permits);
5. Mechanical-Plumbing-Electrical;
6. New Construction; and/or
7. Plan Check/Revisions (can apply to all other permit types).

These permit applications, associated engineering drawings, and other required reports or documents are received at the Building Division counter for processing by the City. The departments involved in reviewing, commenting, conditioning, and approving each of the permits varies. The Building Division is tasked with logging and tracking the application packet for each project and designating the reviews required by the various departments in accordance with the type of permit application. Pre-screening of projects to identify their category as exempt, standard, or PDP for post-construction storm water BMPs and requirements is conducted as part of the initial building permit application. Consistent with the BMP Design Manual, the type of project determines the applicability of the permanent post-construction requirements, including the types of BMPs. By using the summary presented in Table 4-2 and the general processes described in the flowcharts below, the Building Division counter staff can identify the level of review and routing needed for each application received. Any project that has to implement storm water requirements is assigned to Public Services and Engineering for review.

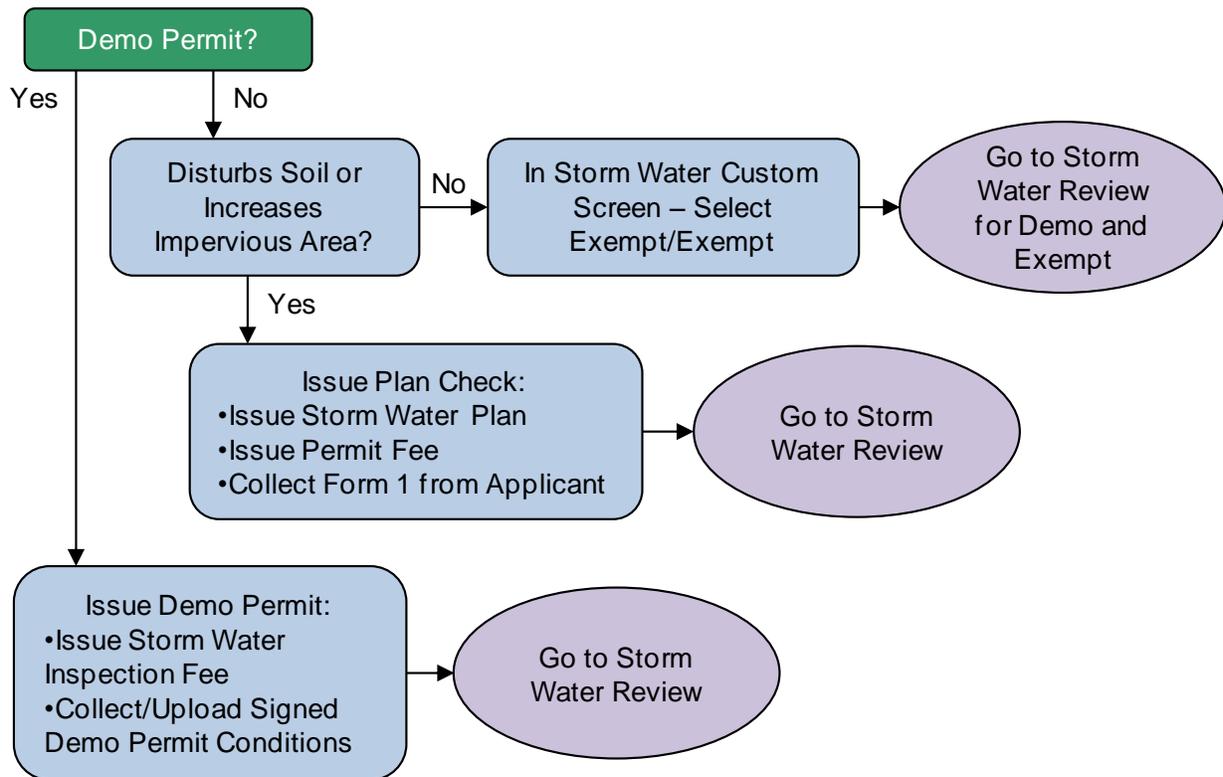
The Public Service and Engineering Department verifies the classification of projects and proceeds with the detailed review, conditioning, and approval of post-construction BMPs and requirements for all standard projects and PDPs.

An overview of the City's Building Division counter processing of building permit applications is provided in Figure 4-10. All applications received are screened for routing, review, conditions, and approval in TRACKiT. All City departments involved in the permit review and approval process have access to TRACKiT. Typically, most permit types trigger a plan check with the exception of miscellaneous permits that include demolition (demo) permits. The process starts with a review of the demo permit applications for issuance of a demo permit that includes storm water requirements and BMPs to be implemented by the applicant. Generally, storm water requirements on demo permits are primarily for the purpose of construction phase BMP implementation (discussed in JRMP Section 5), but this step also serves to identify projects that will result in the creation, replacement, or addition of impervious areas for the new construction that may trigger standard project or PDP requirements for post-construction BMPs.

⁵ Public Services and Engineering is the lead department for these types of permits.



Figure 4-10
Building Division Counter Building Permit Processing Overview Diagram

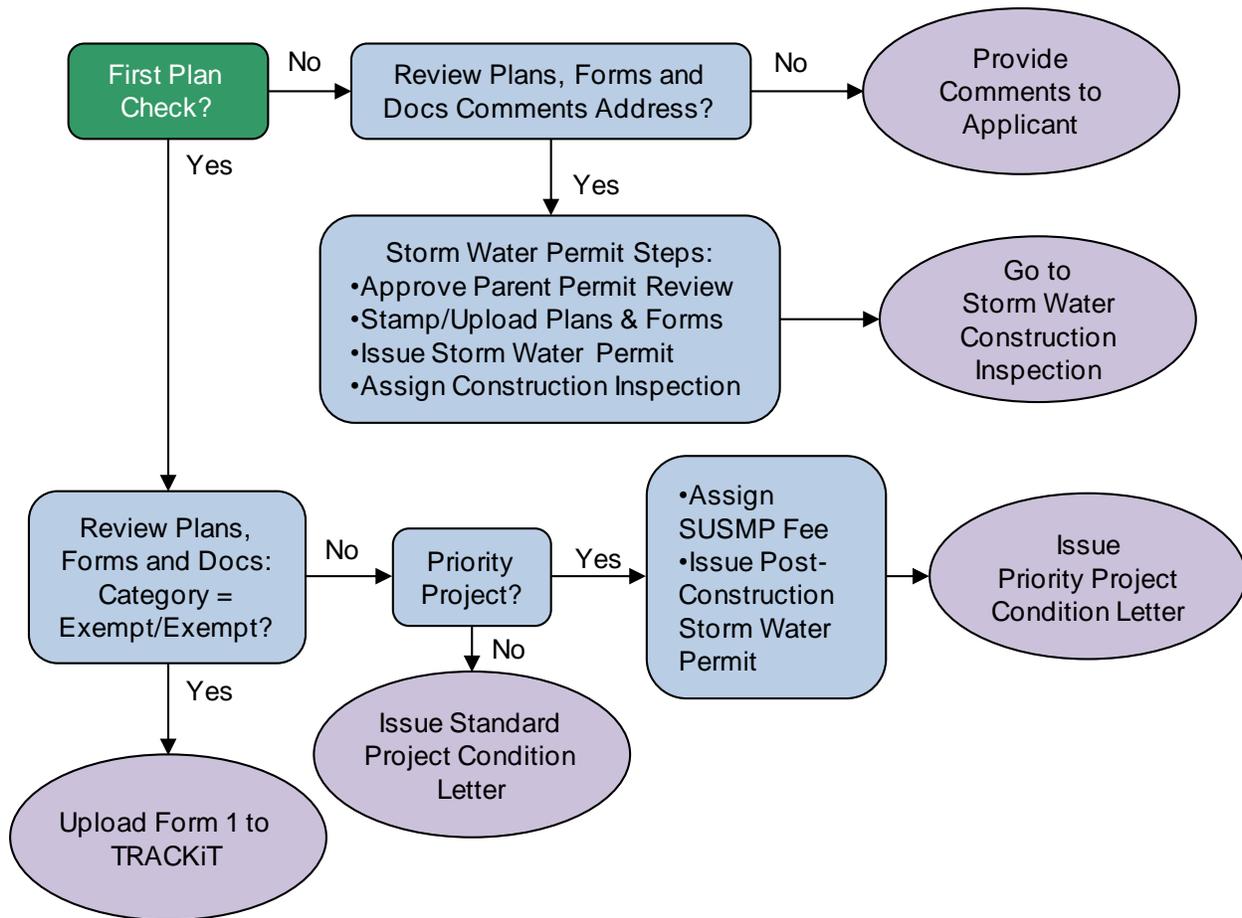


Standard projects and PDPs requiring storm water plan review typically include building and new construction. These projects are identified during the building permit application process at the Building Division counter (Figure 4-10) where applicants complete Form 1 and the City verifies that they do not to qualify for an exemption as described in Sections 4.3 and 4.3.1.

Once standard projects and PDPs are identified, they are issued a storm water permit for tracking purposes. The permitting approval (plan check approval) process entails review and approval of design and other submittals as part of the Building Division's plan check process as shown in the overview diagram in Figure 4-11. The storm water plan check review tasks are led by the Public Services and Engineering Department and coordinated with the Community Development Department.



Figure 4-11
Storm Water Plan Check Review Process Overview Diagram



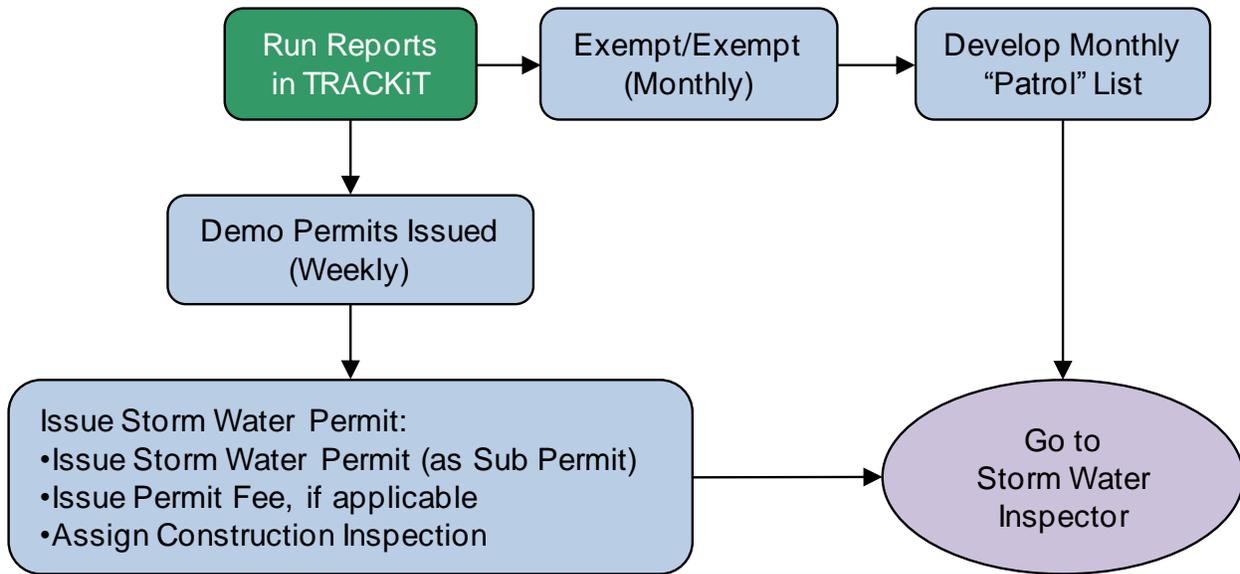
Each project building permit application review and subsequent permit issuance may lead to a number of other actions initiated by the storm water reviewer, including inspections. The storm water reviewer initiates construction phase inspections in TRACKiT for all projects issued building permits, unless exempt. For PDPs, post-construction BMP construction inspections are performed to confirm LID and storm water pollutant control BMPs are built as designed and approved by the City. Upon completion of construction, annual post-construction BMP inspections are scheduled in TRACKiT. All construction and post-construction inspections are led by the Public Services and Engineering Department and may include joint inspections with the Building Division, if needed, to verify compliance with building permit requirements and conditions.

Permit types requiring storm water inspections typically include: building, engineering, miscellaneous (demolition), and new construction. Construction inspections are covered in detail in JRMP Section 5.



Demolition and minor permits (exempt projects) that are not defined as development projects are verified by the Public Services and Engineering Department by conducting “patrols” as part of other routine inspection activities to verify that project site conditions and building practices have not changed that may require other permits or no longer meet the exempt definition. An overview of the verification process for demolition and exempt projects is shown in Figure 4-12.

Figure 4-12
Public Services and Engineering Department Review of Demolition and Exempt Project Process Overview Diagram



4.4.2.2 Storm Water Pollution Control BMP Verification Process

Permit Requirement:	Provision E.3.e.(1)(d)
Title:	Structural BMP Approval and Verification Process
Brief Description:	The City must require and confirm that, prior to occupancy and/or intended use of any portion of the Priority Development Project, each structural/storm water pollution control BMP is inspected to verify that it has been constructed and is operating in compliance with all of its specifications, plans, permits, ordinances, and the requirements of the Permit.
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The Permit (Provision E.3.e.(1)) requires that all storm water pollution control BMPs required by the City be verify to have been designed, constructed, operated and maintained as specified in the approved plans and drawings, the City’s ordinance, Permit, etc.



The storm water pollution control BMP verification process consists of review and verification of project permit applications to:

- Identify and categorize projects as standard projects or PDPs as described in Section 4.3.2 – 4.3.4 above and in the BMP Design Manual;
- Confirm exempt projects that are not required to implement post-construction BMPs;
- Communicate with all PDP applicants to initiate the submittal of forms and documents required to demonstrate compliance with the BMP Design Manual, this JRMP, and the Permit; and
- Identify sources of pollutants that may trigger implementation of additional BMPs to support the San Diego Bay WQIP jurisdictional strategies and priority or focused water quality conditions (e.g., bacteria to support swimmable waters).

All Development Projects are required to submit the City's forms, documents, reports, and checklist(s) found in the BMP Design Manual, as summarized in Table 4-5, for approval of storm water pollution control BMPs, source control, and LID design BMPs to comply with the requirements. The entire "package" that applicants must prepare and submit to the City is known as the Storm Water Management Plan (SWMP).



**Table 4-5
Summary of Submittal Requirements for All Development Projects**

Post-Construction Requirements Storm Water Management Plan Submittals			
Requirements by Category	Permanent BMPs to control post-construction (long-term) land use and facility operations generating pollutants		
Category Basis	Category based on type of land use, size, location, and other criteria applicable to the development or redevelopment project		
Category =>	Priority Development Project	Standard	Exempt (not defined as development)
Coronado JRMP Section	4.3.2 and 4.3.3	4.3.2	4.3.1
BMP Design Manual Chapters	1, 2, 3, 4, 5, 7, 8, Appendices	1, 2, 3, 4, 8, Appendices	NA
Coronado Municipal Code	61.04 61.08.110-120 61.12	61.04 61.08.110-120 61.12	61.04 61.08.110-120 61.12
Coronado Storm Water Review Forms by category	Instructions Form 1-5 Attach. A & B	Instructions Form 1-3	Instructions Form 1
Municipal Storm Water Permit (R9-2013-0001) Implement in 2015-16	E.3.a, E.3.b, E.3.c	E.3.a	NA

The Public Services and Engineering Department is responsible for reviewing, commenting and approving the PDP submittals and verifying compliance with the design requirements outlined in the BMP Design Manual.

During the SWMP review process, any proposed infiltration and groundwater protection requirements, if applicable, are verified to comply with the Permit and BMP Design Manual requirements as described in Section 4.3.7.

The submittal and approval of the SWMP is recorded in the City’s TRACKiT system. Once the SWMP is approved, the City’s permitting process includes conducting periodic inspections to verify the construction of the BMP(s) as permitted, and also a final inspection prior to occupancy. Inspections are entered, tracked, and logged in TRACKiT. Inspections are managed and conducted under the supervision of the Public Services and Engineering Department. For PDPs, initial occupancy and/or intended use of the project site cannot be granted without approval by the Public Services and Engineering Department.



4.4.2.3 *Priority Development Project Inventory and Prioritization*

Permit Requirement:	Provision E.3.e.(2)(a) and (b)
Title:	Priority Development Project Inventory and Prioritization Process
Brief Description:	The City must develop, maintain, and update at least annually, a watershed-based database to track and inventory all Priority Development Projects and associated structural BMPs within its jurisdiction.
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The City maintains a spreadsheet that lists all the PDPs (previously called SUSMP projects) and goes back to December 2002, as required by the Permit. The spreadsheet includes the minimum fields as listed in the Permit, as applicable to Coronado:

1. PDP location (address);
2. Descriptions of storm water pollution control BMP type(s);
3. Date(s) of construction;
4. Party responsible for storm water pollution control BMP maintenance;
5. Dates and findings of storm water pollution control BMP maintenance verifications; and
6. Corrective actions and/or resolutions, when applicable.

In addition, Permit Provision E.3.e.(2)(b) requires that the City prioritize the PDPs with storm water pollution control BMPs and designate them as “high priority” by considering the following:

1. The highest water quality priorities identified in the San Diego Bay WQIP;
2. Receiving water quality;
3. Number and sizes of structural BMPs;
4. Recommended maintenance frequency of structural BMPs;
5. Likelihood of operation and maintenance issues of structural BMPs;
6. Land use and expected pollutants generated; and
7. Compliance record.

The City’s inventory, as of March 2015, consists of 15 approved PDPs and the City has elected not to prioritize the list. In essence, the City has assumed all PDPs in the inventory are high priority (for the purposes of implementing and complying with the requirements listed in Section 4.4.2.4). The March 2015 inventory (Storm Water Standards Manual, Section 4-A) is updated periodically and at minimum annually for the annual report.



4.4.2.4 *Storm Water Pollutant Control BMP Maintenance Verification and Inspections*

Permit Requirement:	Provision E.3.e.(3)
Title:	Structural BMP Maintenance Verification and Inspections
Brief Description:	The City is required to verify that structural BMPs on each Priority Development Project are adequately maintained, and continue to operate effectively to remove pollutants in storm water to the MEP through inspections, self-certifications, surveys, or other equally effective approaches.
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The City’s Public Services and Engineering Department is responsible for conducting, at minimum, annual operation and maintenance inspections of the inventoried PDP storm water pollutant control BMPs. Inspections are logged and tracked in the City’s TRACKiT system. Standardized forms are used to log inspections findings and any corrective actions. Inspection forms and other relevant documents are found in the Storm Water Standards Manual, Section 4-E. An overview of the City’s post-construction BMP inspection process is provided in Figure 4-13.

The City may opt in the future to use other verification methods (e.g., self-certifications) if it deems they will provide equally effective information on the operation and maintenance practices of these BMPs by property owners.

Permit Provision E.3.e.(3) requires verification and inspections to meet the following requirements:

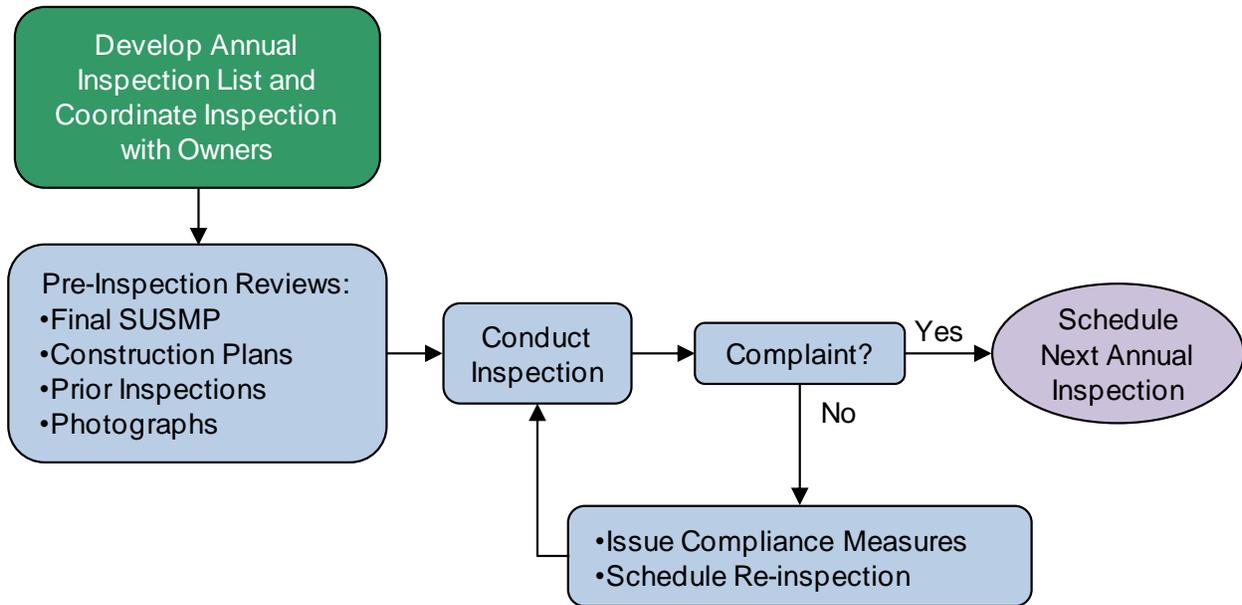
1. All (100 percent) of the structural BMPs at PDPs that are designated as high priority must be inspected directly by the City annually prior to each rainy season⁶;
2. For verifications performed through a means other than direct City inspection⁷, adequate documentation must be required by the City to provide assurance that the required maintenance of structural BMPs at each PDP has been completed; and
3. Appropriate follow-up measures (including re-inspections, enforcement, etc.) must be conducted to ensure that structural BMPs at each PDP continue to reduce pollutants in storm water to the MEP as originally designed.

⁶ As noted in Section 4.4.2.3, at this time the City has designated all Priority Development Projects as high priority.

⁷ Direct City inspection includes in Coronado inspections conducted by City contracted inspectors.



Figure 4-13
Public Services and Engineering Department Post-Construction Annual Inspection Process Overview Diagram



4.4.3 Development Project Enforcement

Permit Requirement:	Provision E.3.f
Title:	Development Project Enforcement
Brief Description:	The City must enforce its legal authority established pursuant to Provision E.1 for all development projects, as necessary, to achieve compliance with the requirements of the Permit, in accordance with its Enforcement Response Plan (Permit Provision E.6).
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Permit Provision E.3.f requires the City to enforce its legal authority established for all development projects, as necessary, to achieve compliance with the requirements of the Permit, according to the City’s Enforcement Response Plan (Permit Provision E.6).

The City has established its legal authority to enforce standards and requirements applicable to all development projects through the City’s municipal code and the adoption of the BMP Design Manual as part of the Storm Water Standards Manual.

The City has developed and implements an Enforcement Response Plan as part of this JRMP and it is found, along with the legal authority documentation, in Section 2 of this JRMP.



4.5 Annual Reporting

A comprehensive annual reporting plan to meet the requirements in the Permit is included in Section 9 of this JRMP.

The minimum annual reporting requirements listed in the Permit Appendix D-3, the Jurisdictional Runoff Management Program Annual Report Form (Annual Report Form), for the Development Planning component include:

Answers (yes or no) to the following questions:

1. Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?
2. Was an update to the BMP Design Manual required or recommended by the San Diego Water Board?

If yes, to the question above, did the Copermittee update its BMP Design Manual and make it available on the Regional Clearinghouse?

Reporting of the following data or statistics:

1. Number of proposed development projects in review
2. Number of PDPs in review
3. Number of PDPs approved
4. Number of approved PDPs exempt from any BMP requirements
5. Number of approved PDPs allowed alternative compliance
6. Number of PDPs granted occupancy
7. Number of completed PDPs in inventory
8. Number of high priority PDP structural BMP inspections
9. Number of PDP structural BMP violations
10. Number of enforcement actions issued
11. Number of escalated enforcement actions issued

The Permit is not clear on the definition nor does it provide an explanation of the field or entries to be submitted in the Annual Report Form. To assist City staff in consistently reporting data from year-to-year, the definitions or clarifications provided in Table 4-6 were developed as part of the JRMP preparation process⁸.

⁸ Note: these definitions were applied with the Annual Report form starting with FY 2013-14.



**Table 4-6
Annual Report Form Definitions for Development Planning**

Reporting Item	Definition or Clarification
Number of proposed development projects in review	All projects submitted and in review without final approval; Report generated from TRACKiT of all PC submittal for the FY; TRACKiT report is PERM40 filter for Permit Numbers and Plan Check.
Number of PDPs in review	Priority projects submitted and in review and without final approval during FY; Report from TRACKiT for all PC submittals
Number of PDPs approved	Priority projects issued approval or conditional approval letter by Public Services within FY
Number of approved PDPs exempt from any BMP requirements	Tracked and determined by Public Services. Separate PDP tracking log
Number of approved PDPs allowed alternative compliance	Tracked and determined by Public Services. Separate PDP tracking log
Number of PDPs granted occupancy	Not granted occupancy; still under construction or other condition
Number of completed PDPs in inventory	Public Services tracking sheet; Sum of existing and new projects for the fiscal year
Number of high priority PDP structural BMP inspections	Post-construction structural BMP annual inspections and re-inspections (not construction); Tracked by Public Services
Number of PDP structural BMP violations	Notice of Violation (NOV) or higher violation issued
Number of enforcement actions issued	Enforcement action NOV or higher
Number of escalated enforcement actions issued	Any enforcement action issued for the same type of violation taken to the next level (e.g., Warning-> NOV or NOV -> stop work order/CDO, etc.)

In order to meet the reporting requirements, the City has established a variety of computer-aided tools or programs that facilitate data tracking and management. Essential data tracking, management and reporting tools for the Development Planning component of the JRMP are:

1. The continued support and use of the TRACKiT system;
2. Maintenance of the PDP spreadsheet (add new projects with all required data fields);
3. Maintenance of inspection tracking spreadsheet and completed inspection forms in TRACKiT; and
4. Documentation of all enforcement actions issued in TRACKiT.



5.1 Construction Management Requirements

Permit Requirement:	Provision E.4
Title:	Construction Management
Brief Description:	The City must implement a construction management program in accordance with the strategies in the San Diego Bay WQIP and the minimum requirements listed in the Permit.
Permit Page Number:	95 of 127

Permit Provision E.4 requires that the City implement a construction management program in accordance with the jurisdictional strategies in the San Diego Bay Water Quality Improvement Plan (WQIP), as noted in Section 5.2, and that includes, at a minimum, the following requirements:

1. Project Approval Process (Permit Provision E.4.a);
2. Construction Site Inventory and Tracking (Permit Provision E.4.b);
3. Construction Site Best Management Practice (BMP) Implementation (Permit Provision E.4.c);
4. Construction Inspections (Permit Provision E.4.d); and
5. Construction Site Enforcement (Permit Provision E.4.e).

This JRMP section describes the City’s construction management program compliant with the requirements of the Permit.

Municipal Code

The City’s legal authority to require and enforce construction BMP requirements for project sites is provided in Coronado Municipal Code 1.08, 1.10, 61.04, 61.08 and 61.12.

5.2 Jurisdictional Strategies – San Diego Bay WQIP

The San Diego Bay WQIP describes the role and purpose of jurisdictional strategies in detail and may be consulted for a more comprehensive understanding of the selection of high priority or focused water quality conditions in the San Diego Bay watersheds. In summary, the San Diego Bay WQIP identified for the Coronado Hydrologic Sub-Area (HSA) No. 910.1 a focused priority condition or goal of swimmable waters (beaches) with bacteria as the targeted pollutant to be addressed in order to achieve the goal. The City developed a list of jurisdictional strategies as part of the San Diego Bay WQIP that will support the goal of swimmable waters. In Section 4, Figure 4-1 depicts the Coronado HSA in relationship to the City’s jurisdictional boundary.



Activities and programs that are not directly linked to the San Diego Bay WQIP and its jurisdictional strategies are only subject to the City's core elements in accordance with the Permit.

5.2.1 Implementation of Jurisdictional Strategies

Coronado's jurisdictional strategies include activities associated with construction projects specifically targeting bacteria sources that can impact the goal of swimmable water (beaches). Construction sites have the potential to contribute bacteria through sediment, erosion or other construction related activities. The City will verify the selection of BMPs and require, if needed, additional or specific construction BMPs to reduce or eliminate the potential impact on receiving waters (beaches). The full table of jurisdictional strategies is reproduced from the San Diego Bay WQIP and presented in Storm Water Standards Manual, Section 1-C. In summary, the two jurisdictional strategies for the construction portion of the JRMP are:

1. Implement a program to identify and inspect bacteria source potential, and require construction projects within the Water Quality Sensitive Area (WQSA) to be identified as High Threat to water quality and implement appropriate BMPs; and
2. Implement a program to permit and inspect construction site use of Right-of-Way for debris and trash storage with appropriate BMPs.

Both jurisdictional strategies apply directly to internal City operations and the implementation of the JRMP as described in Sections 5.2.2. The two jurisdictional strategies also apply externally to construction project proponents as described in Section 5.2.3.

5.2.2 Internal Jurisdictional Strategies

Internal jurisdictional strategies are implemented as part of the City's operations related to construction activities. Internal jurisdictional strategies involve: 1) staff's review of projects to identify if they are located within the City's WQSA, classify them as high threat to water quality (see Section 5.3.2 and Figure 5-1), permit them, and require them to address potential sources of bacteria through the implementation of source, erosion and sediment control BMPs, as applicable; and 2) for projects requiring a right-of-way permit, classify them as medium threat to water quality, permit them, and inspect them to verify proper maintenance of storage receptacles for debris and trash, and the installation of BMPs. More information on potential sources of bacteria from construction sites is provided in Section 5.2.4.

5.2.3 External Jurisdictional Strategies

The two external jurisdictional strategies apply directly to construction projects and the activities or requirement that implement to meet the swimmable water goal. As describe above, a construction project (including demolition projects) may be identified by the Building Services Division counter staff as being located within the WQSA and classified as high threat to water



quality. These project must implement measures to minimize impacts on receiving waters. To manage these requirements, these projects are issued storm water permits that require them to implement BMPs appropriate for the site conditions and to minimize sediment, erosion and pollutant (i.e. bacteria) discharges (to the WQSA). Second, the City issues permits and requires project proponents with right-of-way permits to prepare a construction BMP plan, and implement and maintain BMPs. The right-of-way permit allows projects to install debris and trash storage receptacles (e.g., roll-offs) on the public right-of-way, such as streets or alleys, when site constraints cannot accommodate them on the project property.

5.2.4 Construction Sites as Potential Pollutant Sources – Bacteria

The San Diego Bay WQIP provides general guidance on the potential sources of bacteria and it includes construction activities. Table 5-1 has been incorporated (with minor modifications and deletion of the types of facilities not found in Coronado) from Appendix G of the San Diego Bay WQIP and provides a general inventory of the types of facilities and potential pollutant types. The bacteria/pathogen column shows that construction activities or sources are unlikely (UL) to contribute bacteria or pathogens to storm water or urban runoff, yet have a moderate to high potential for discharge. Therefore, construction site specific conditions and location are critical factors. As noted above, the City has elected to place the emphasis on projects located within the WQSA and which obtain a right-of-way permit since they are more likely to have an impact on water quality.



Table 5-1
Pollutant Generating Sources – 910.1 Coronado Hydrologic Subarea
(Based on and edited from San Diego Bay WQIP Table G-8)*

Inventory Sites/Facilities**	Pollutant Source Loading Potential***							
	Heavy Metals	Organics	Oil & Grease	Sediment	Pesticides	Nutrients	Gross Pollutants	Bacteria/Pathogens
Animal	N	L	UL	L	UK	L	UK	L
Automotive	L	L	L	UL	UL	UK	L	UL
Contractor	UL	UL	UL	L	UL	UL	L	UL
Food Establishment	N	L	L	UL	UK	UK	L	L
Equipment	L	L	L	UL	UL	UK	L	UL
General Retail	UL	UL	UL	L	UL	UL	L	UL
Municipal	L	L	L	L	UK	UK	UK	UL
Construction	UL	UL	UL	L	UL	UL	L	UL
Residential	L	L	L	L	L	L	UK	L

*Non-applicable categories deleted (e.g., General Industrial). Prepared based on the WURMP Copermittees FY 2012 JURMP Annual Reports.

**Other sources are not reported in this table including: Land Development and Non-inventoried Businesses

***Pollutant Source Loading Potential taken from BLTEA 2005 and LTEA 2011; N = None, UK = Unknown, UL = Unlikely, L = Likely

None (N) includes sources with zero identified pollutant generating activities and low discharge potential.

Unknown (UK) includes sources with one or more identified pollutant generating activities, but very low discharge potential.

Unlikely (UL) includes sources with no pollutant generating activities, but high discharge potential, or sources with moderate discharge potential and one or more pollutant generating activities.

Likely (L) includes sources with high discharge potential and identified pollutant generating activities.

5.3 Project Approval Process

Permit Requirement:	Provision E.4.a
Title:	Project Approval Process
Brief Description:	The City must implement a construction management program that includes the minimum project approval process requirements outlined in the Permit.
Permit Page Number:	95 of 127

As noted above, the first of the minimum requirements for the City's construction management program is to implement a project approval process.

5.3.1 Project Approval Process Requirements

Permit Provision E.4.a states that the City must have a project approval process that includes the following, prior to issuance of any local permit(s), that allows the commencement of



construction projects that involve ground disturbance or soil disturbing activities that can potentially generate pollutants in storm water runoff:

1. Require a construction BMP plan¹ to be submitted by the project applicant to the City;
2. Confirm the construction BMP plan complies with local ordinances² and the requirements of the Permit;
3. Confirm the construction BMP plan includes seasonally appropriate and effective BMPs and management measures, described in Section 5.5 (Construction Site BMP Implementation; Provision E.4.c), as applicable to the project; and
4. Verify that the project applicant has obtained coverage under the statewide Construction General Permit (CGP) (Order 2012-0006-DWQ or subsequent Order), if applicable.

5.3.2 Project Approval Process Implementation

The City's implementation of the Permit's requirements for the construction management component of the Permit start at the City's Building Services Division counter located at City Hall. All building permits are processed at the City's Building Services Division counter.

As noted in earlier sections of this JRMP, the City of Coronado is a small, tourism-oriented, suburban community. The City's unique, residential character, with businesses along very specific corridors, results in construction projects that are limited in scope and size (acreage) compared to neighboring cities. The following characteristics define typical construction projects in Coronado:

- Construction projects on undisturbed land are extremely rare, if at all applicable;
- The City is composed primarily of residential land use (excluding neighboring federal properties);
- Minor construction projects make-up the majority of the building permits issued for residential remodel and commercial tenant improvement projects; and
- Commercial tenant improvement construction is mainly interior remodels in existing structures made-up primarily of restaurants, hotels, retail businesses and a few other service businesses. Industrial facilities do not exist in Coronado.

¹ The Permit lists pollution control plan, construction BMP plan, and/or an erosion and sediment control plan. The City of Coronado requires a construction BMP plan or plan sheet as part of the project submittal (design plans/sheets).

² The Permit references local grading ordinance and other applicable ordinances. The City of Coronado does not have a local grading ordinance since mass grading projects do not take place on predominant small lots.



- Construction projects do not include mass grading activities; any grading is limited to excavation for building structures, or minor contouring to accommodate new buildings or additions/remodels to existing buildings.
- Construction sites greater than one (1) acre and subject to the State's CGP are very rare. If applicable, they are likely to be City public projects.

Construction projects are classified into three categories: high threat, medium threat and exempt (low or no threat) of sediment discharge to the Municipal Separate Storm Sewer Systems (MS4) or receiving waters. Table 5-2 summarizes the City's criteria for classification of construction projects into these three categories.

The classification of projects is subject to the review and approval of the Public Services and Engineering Department. The criteria for each classification include, at minimum, the following:

- High Threat:
 - Project sites located within, directly adjacent to, or discharging directly to a receiving water within an WQSA; and
 - Projects triggering coverage under the CGP
- Medium Threat:
 - Project sites obtaining a right-of-way permit to store construction debris and trash on the City's right-of-way;
 - Projects issued a demolition, building, miscellaneous, new construction or other permit as determined by Public Services and Engineering due to land disturbance or soil exposure activities on the site; and
 - At the discretion of the Public Services and Engineering Department, any project that, due to the location, type of construction, compliance history or other factors, has the potential to produce storm water pollution and thus requires a construction BMP plan and inspections by the City.
- No Threat or Exempt:
 - All other projects that do not disturb soil or land, including interior remodels, certain miscellaneous permits as long as there is not risk of erosion, sediment or pollutant discharges to the MS4 or receiving waters, determined at the discretion of Public Services and Engineering Department.

Construction Project Classification

During the permit application and review process, construction projects are classified based on their threat to water quality as:

- High threat
- Medium threat
- Low or no threat (exempt)



**Table 5-2
Summary of Submittal Requirements for Construction Projects**

Construction BMP Plan Submittals			
Requirements by Category	Temporary BMPs to control construction erosion and sediment with good housekeeping and pollution prevention		
Category Basis	Category based on threat of sediment and pollutant discharge during land disturbance and construction activities		
Category =>	High Threat	Medium Threat	Low or No Threat (Exempt)
Coronado Municipal Code	61.04 61.08 61.08.100 61.12	61.04 61.08 61.08.100 61.12	61.04 61.08 61.08.100 61.12
Construction General Permit (2009-0009-DWQ and amendments)	Notice of Intent, WDID, SWPPP, etc.	NA	NA
California Stormwater Quality Association (CASQA) Construction BMP Handbook	Source, Erosion & Sediment Control BMPs	Source, Erosion & Sediment Control BMPs	NA
Coronado Construction BMP Trifold	General BMPs	General BMPs	NA
Coronado Storm Water Review Forms by Category	Instructions. Form 1 Attach. B & C	Instructions. Form 1 Attach. C	Instructions. Form 1

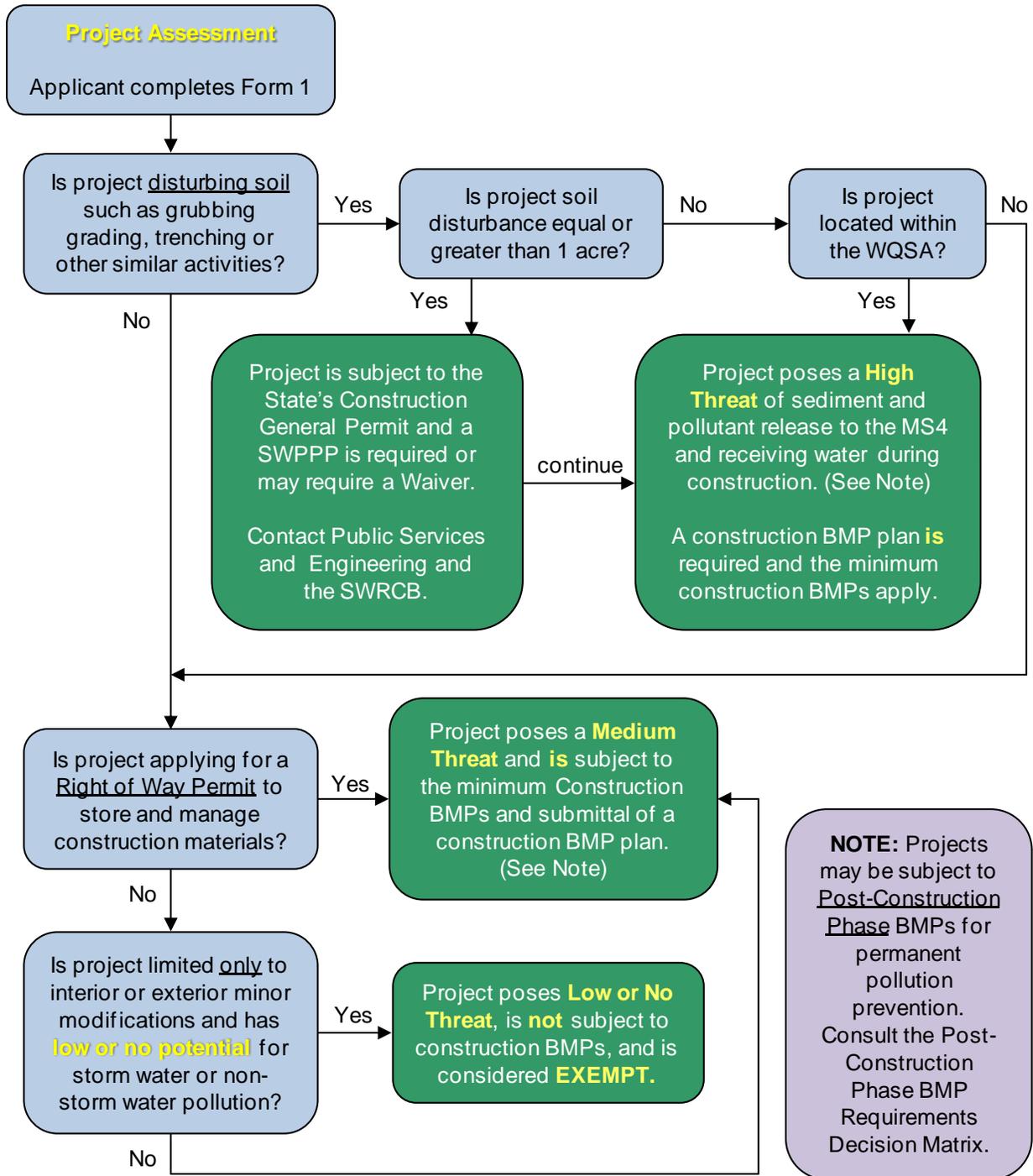
All construction projects processing an application at the City’s Building Services Division counter are required to complete and submit a project assessment form that allows the project proponent and the City to review and verify the type of construction at the site, the threat to water quality category, and the appropriate permitting strategy. Projects subject to storm water permitting are required to select appropriate erosion, sediment, and pollutant control BMPs based on site conditions. The City’s forms and specific submittals are verified by the City’s Public Services & Engineering Department upon submittal. The forms are found in the City’s Storm Water Standards Manual and the City’s website.

The construction threat category is entered into the City’s permit tracking system (TRACKiT) for each project reviewed at the City’s Building Services Division counter. TRACKiT has been programmed to identify the parcels in the City that are most likely to trigger the WQSA high threat criteria and are subject to review by the Public Services and Engineering Department for verification.

A summary of the City’s permit approval and construction site classification process is shown in Figure 5-1.



Figure 5-1
Construction Phase Project Assessment Process Flow Chart





5.3.2.1 Project Approval Process – Departmental Responsibilities

In the following sections, the City's departmental responsibilities are specified and include the processes or systems to comply with the requirements outlined in Permit Provision E.4.a.

An overview of the City's organizational structure and roles and responsibilities is provided in Section 1.4 of this JRMP. Two City departments: 1) Community Development, and 2) Public Services and Engineering, have the majority of the responsibility for implementation of the construction management component of the Permit. The Community Development Department has a key role in building and construction project permitting, and the Public Services and Engineering Department is instrumental in the overall implementation of the operation and management of the storm water program for the City.

The following sections provide the details of the roles and responsibilities related to this component. For this and all other JRMP components, City departments are expected to work cooperatively to meet Permit requirements and compliance.

Community Development

The Community Development Department is responsible for management of a variety of programs and activities. Those that relate to construction management activities are:

- Processing of applications for Special Use Permits, Variances, Coastal Permits and Parking Plans;
- Processing of applications for Subdivision Maps, Lot Line Adjustments, and Lot Consolidations;
- Processing of applications for Design Review for Commercial and Multi-Family development, Historic Designation, and signs;
- Environmental review of projects in accordance with the California Environmental Quality Act (CEQA);
- Building construction plan check, permit issuance, and inspections;
- Code enforcement; and
- Public information source including archives for planning and building public records.

Permitting activities, with the exception of CIPs undertaken by the City, are initiated through the Building Services Division counter that is part of Community Development. The role of the Building Services Division is instrumental to the implementation of construction requirements of the municipal storm water management program and compliance as required by the Permit.



The Building Services Division counter is where initial information, forms, and submittals for building permits take place. The Building Services Division counter acts as the central location for receipt of permit applications, building plans, and other documentation and reports that are processed by the City. Community Development Department divisions, as well as other City departments, work jointly to address all regulatory requirements applicable to land use, land development, and construction activities through the issuance of the required approvals and permits.

The primary role of the Building Services Division as it relates to implementation of the JRMP and Permit compliance is to receive project applications and forms, log them into TRACKiT, and assign review and approval responsibilities to the various departments or divisions based on the type of construction and required permits.

Public Services and Engineering

The Public Services and Engineering Department is composed of two divisions that have important and distinct roles and responsibilities associated with the implementation of the JRMP.

Functions related to the construction management component of the JRMP that are managed by the Utilities Division include:

1. Review of construction projects for compliance with the Permit and the JRMP;
2. Verification of project classification as exempt, medium threat, or high threat to water quality;
3. Approval of construction BMP plans for high and medium threat construction projects;
4. Verification, through inspections, of the proper installation and maintenance of construction-related BMPs as approved by the City;
5. Enforcement of requirements; and
6. Inspection of construction upon completion for removal of BMPs.

The Utilities and Engineering Divisions works closely with the Building Services Division to administer the construction management component of the JRMP.

Engineering is responsible for management of a variety of programs including:

- General Engineering Services: Provides right-of-way and encroachment permits, maintains all parcel and subdivision maps, and records of surveys. Acts as the plan holder for all street, sewer, storm drain, facilities and miscellaneous improvements.



- **Traffic Engineering:** Provides objective studies of all traffic safety issues based on traffic warrants, traffic manuals and other applicable standards.
- **Street Maintenance and Improvement Program:** Provides for the planning, design, repair and maintenance of the 40 miles that comprise the public street system.
- **Storm Drainage Improvement Program:** Provides for the repair and upgrading of the City storm drainage system while ensuring compliance with the National Pollutant Discharge Elimination System (NPDES) regulations.
- **Wastewater Utility Improvement Program:** Provides for the major repairs and improvements to the sanitary sewer system which consists of 43 miles of sewer mains, twelve pump stations, and the transbay pipeline.

Engineering is responsible for issuing right-of-way permits, providing technical guidance and expertise on a variety of City projects, and supporting the Utilities Division and Community Development Department with the implementation of the review services and permit approvals related to this JRMP component.

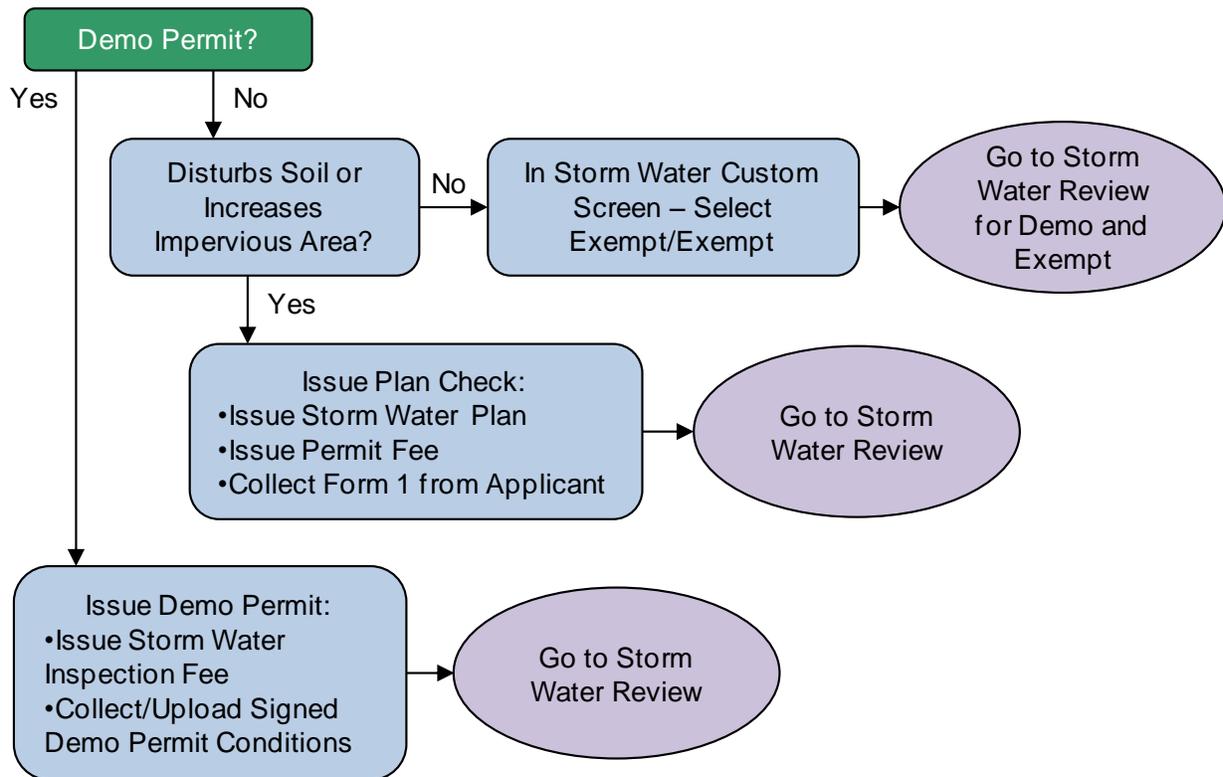
5.3.2.2 Project Approval Process Overview

The Utilities Division of the Public Service and Engineering Department verifies the classification of projects and proceeds with the detailed review and approval of the project assessment forms submitted by applicants, review and approval of construction BMP plans, and coordination of other requirements with City department or divisions as needed (e.g., right-of-way permits by Engineering).

An overview of the City's Building Division counter processing of building permit applications is provided in Figure 5-2. All applications received and screened for routing, review, conditions, and approval are tracked in TRACKiT. All City departments involved in the permit review and approval process have access to TRACKiT. Most permit types trigger a plan check with the exception of miscellaneous permits that include demolition (demo) permits. The process starts with a review of the demo permit application for issuance of a demo permit that includes storm water requirements and BMPs to be implemented by the applicant. Generally, storm water requirements on demo permits are primarily for the purpose of construction phase BMP implementation.



Figure 5-2
Building Division Counter Building Permit Processing Overview Diagram

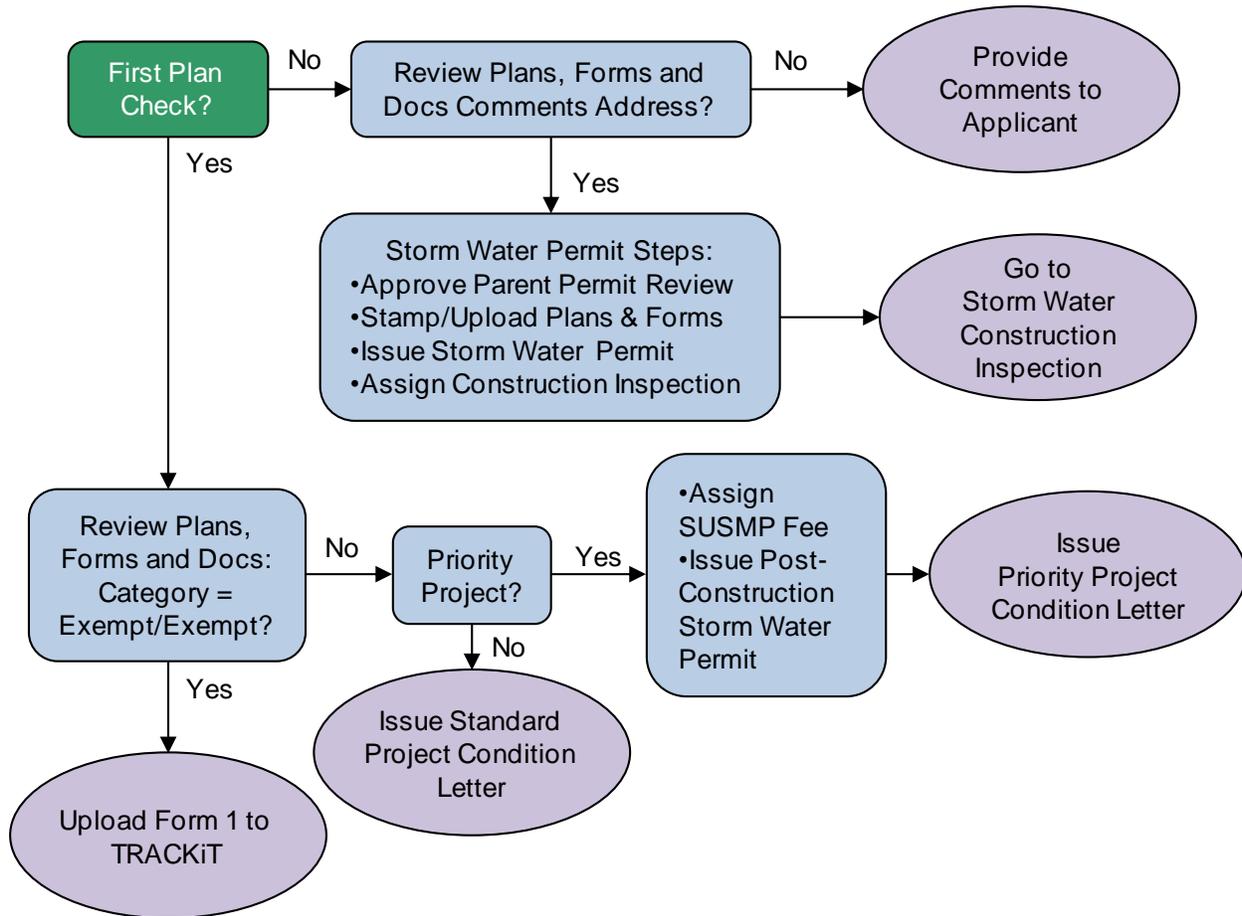


Building permit applications for projects requiring storm water review and a construction BMP plan typically include demolition, building, and new construction types. These projects are identified during the building permit application process at the Building Division counter (Figure 5-2) where applicants complete the City’s Storm Water Project Assessment Form, and verification that they do not to qualify for an exemption is determined as described in Section 5.3.2.

The Building Division counter initial review and screening is designed to categorize for both development planning compliance with post-construction requirements (JRMP Section 4) and construction management as described in this section. Once medium or high threat category projects are identified, they are issued a storm water permit for tracking purposes. The permitting approval (plan check approval) process entails review and approval of the construction BMP plan as shown in the overview diagram in Figure 5-3. The storm water plan check review tasks are led by the Public Services and Engineering Department and coordinated with the Community Development Department. This process includes the assignment of construction inspections.



Figure 5-3
Storm Water Plan Check Review Process Overview Diagram



Each project building permit application review and subsequent permit issuance may lead to a number of other actions initiated by the storm water reviewer, including inspections. The storm water reviewer initiates construction phase inspections in TRACKiT for all projects issued building permits, unless exempt. Upon completion of construction, the final date is entered and inspections are closed in TRACKiT. All construction inspections are led by the Public Services and Engineering Department and may include joint inspections with the Building Division, if needed, to verify compliance with building permit requirements and conditions.

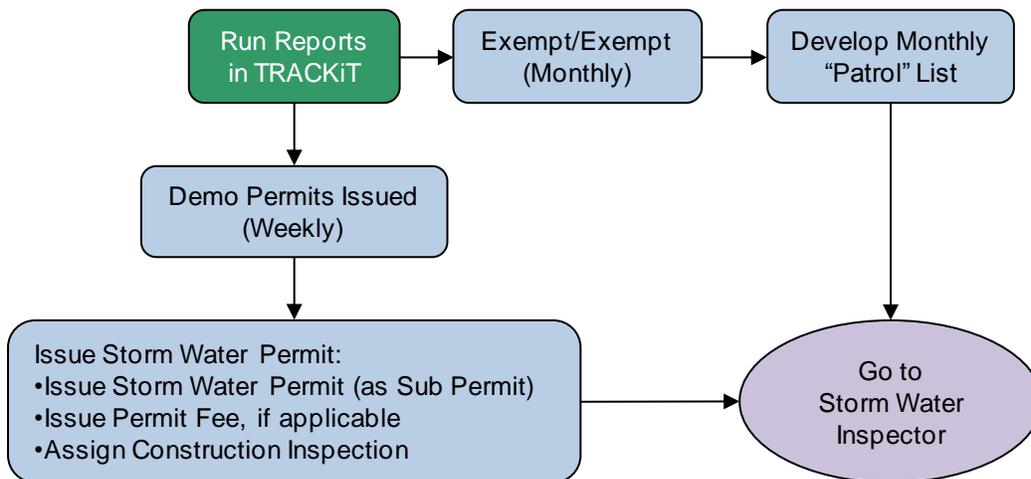
Permit types requiring storm water inspections typically include: building, engineering, miscellaneous (demolition), and new construction.

Demolition and minor permits (exempt projects) are subject to verification that they are compliant with general storm water requirements and not engaged in illicit discharges as defined in the City's ordinance, this JRMP, and the Permit. The Public Services and Engineering Department conducts "patrols" as part of other routine inspection activities to verify that project



site conditions and building practices have not changed, and that the exempt category continues to be valid. An overview of the verification and inspection process for demolition and exempt projects is shown in Figure 5-4.

**Figure 5-4
Public Services and Engineering Department Review of Demolition
and Exempt Project Process Overview Diagram**



5.4 Construction Site Inventory and Tracking Requirements

Permit Requirement:	Provision E.4.b
Title:	Construction Site Inventory and Tracking
Brief Description:	The City must maintain and update, at least quarterly, a construction site inventory with the minimum information required by the Permit.
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Permit Provision E.4.b requires the City to maintain and update, at least quarterly, a watershed-based inventory of all construction projects issued a local permit for ground disturbance or soil disturbing activities that can potentially generate pollutants in storm water runoff. The Permit also lists the minimum requirements for the inventory system in Provision E.4.b.(1), as follows:

1. Relevant contact information for each site (e.g., name, address, phone, and email for the owner and contractor);
2. The basic site information including location (address and hydrologic subarea), Waste Discharge Identification (WDID) number (if applicable for CGP sites), size of the site, and approximate area of disturbance;



3. Whether or not the site is considered a high threat to water quality, as defined in Section 5.4.2 (Provision E.4.b.(2));
4. The project start and completion dates;
5. The required inspection frequency, as defined in Section 5.6.1;
6. The date the City accepted or approved the construction BMP plan; and
7. Whether or not there are ongoing enforcement actions administered to the site.

As applicable, the City’s implementation of the construction site inventory and tracking is presented in Section 5.4.1.

5.4.1 Implementation of Construction Site Inventory and Tracking

The City logs all issued construction permits (demolition, building, new construction, miscellaneous, etc.) in the permit tracking system, TRACKiT, and assigns a storm water permit that allows the Utilities Division of the Public Services and Engineering Department to manage all storm water requirements for each permit based on the threat category as noted in Section 5.3.2. The information received from the applicant in the City’s storm water assessment forms is the basis for the data used to populate the entries in TRACKiT and the storm water permit.

The TRACKiT database allows the City to generate a construction site inventory list that meets the requirements of the Permit as noted in Section 5.4 above and as follows:

1. The City only has one hydrologic area (HSA 901.1) and no distinction is needed in the database; and
2. Projects meeting the criteria for filing under the state’s CGP are rare. They are noted in the inventory and classified as high threat (see below, Section 5.4.2.).

5.4.2 Implementation of Construction Site Inventory and Tracking for High Threat Sites

Permit Requirement:	Provision E.4.b.(2)
Title:	Construction Site Inventory and Tracking - high threat sites
Brief Description:	The City must identify all construction sites within its jurisdiction that represent a high threat to downstream water quality and consider the factors listed in the Permit.
Permit Page Number:	96 of 127

Permit provision E.4.b.(2) requires that the City identify all construction sites with a high threat to downstream surface water quality and, at minimum, consider the following:



1. Sites located within a hydrologic subarea where sediment is known or suspected to contribute to the highest priority water quality conditions identified in the San Diego Bay WQIP;
2. Sites located within the same hydrologic subarea and tributary to a water body segment listed as impaired for sediment on the Clean Water Act (CWA) section 303(d) List;
3. Sites located within, directly adjacent to, or discharging directly to a receiving water within an Environmentally Sensitive Areas (ESA); and
4. Other sites determined by the City or the San Diego Water Board as a high threat to water quality.

Of the four Permit factors listed above, two apply in Coronado as noted in Table 5-3.

**Table 5-3
Summary of High Threat Construction Project Criteria**

Condition, As May Apply to Coronado	Findings
Sediment as highest priority water quality condition identified in the San Diego Bay WQIP	Not applicable
Sites located or tributary to a water body segment listed as impaired for sediment in the CWA section 303(d) List	Not applicable
Sites located within, directly adjacent to, or discharging directly to a receiving water within an ESA	Yes, Coronado's WQSA is a trigger for high threat category for construction projects
Other site categories as determined by the City or San Diego Water Board	The City will classify projects that trigger coverage under the CGP as high threat

As noted earlier in Section 5.3.2, all permit applications are screened at the Building Services Division counter using a storm water project assessment form in order to properly categorize each project as high threat, medium threat or exempt. The permitting system (TRACKiT) includes fields to enter the threat category and automatically flags projects that may trigger the WQSA, which leads to further review by Public Services and Engineering. The Public Services and Engineering Department is responsible for verifying, on a random basis, the categorization of projects. Categories and requirements may also change as a result of inspections and enforcement actions at the discretion of the department.



5.5 Construction Site BMP Implementation Requirements

Permit Requirement:	Provision E.4.c
Title:	Construction Site BMP Implementation
Brief Description:	The City must implement, or require the implementation of construction BMPs to the MEP.
Permit Page Number:	96 of 127

Per Permit Provision E.4.c, the City must implement, or require the implementation of, effective BMPs to reduce discharges of pollutants in storm water from construction sites to the Maximum Extent Practicable (MEP), and effectively prohibit non-storm water discharges from construction sites into the MS4. These BMPs must be site specific, seasonally appropriate, and construction phase appropriate. BMPs must be implemented at each construction site year round. Dry season BMP implementation must plan for and address unseasonal rain events that may occur during the dry season (May 1 through September 30). The City must implement³, or require the implementation of, BMPs in the following categories:

1. Project Planning;
2. Good Site Management “Housekeeping”, including waste management;
3. Non-storm Water Management;
4. Erosion Control;
5. Sediment Control;
6. Run-on and Run-off Control; and
7. Active/Passive Sediment Treatment Systems, where applicable.

5.5.1 Construction Site BMPs Implementation Process

As noted earlier in Section 5.3.2, in the City of Coronado construction projects are generally very small (less than 5,000 square feet of total land disturbance) and the majority are residential, single-family home remodels, additions, or new construction. Therefore, the selection and implementation of construction site BMPs primarily focuses on:

- Project planning – with an emphasis on wet weather period projects and projects that are idle between demolition phase and start of construction (projects in Coronado are generally in construction for less than a year);
- Good site management or housekeeping – including waste management in the form of permitting of trash and debris containers in the right-of-way and sediment control BMPs;

³ The City will only implement construction site BMPs on City projects and may implement BMPs as a result of eminent threat to water quality for private projects in an emergency, if practical.



- Non-storm Water Management – to minimize or eliminate illicit discharges including spills; and
- Sediment control – applied extensively in Coronado due to the small and constrained conditions of project sites.

Secondary focus is given to the following types of construction site BMPs:

- Erosion control – applies as needed for larger projects, slopes or hillsides (rare) and “inactive” sites;
- Run-on and Run-off Control – which is not frequently an issue; and
- Active/Passive Sediment Treatment Systems – if ever applicable.

The City has established guidance for each applicant’s project based on the pollutant threat category (high or medium) as specified in the Storm Water Standards Manual, Section 5. It is up to the project applicant, or the applicant’s engineer or contractor, to provide a construction BMP plan to the City showing the location and type of BMPs appropriate for the site’s conditions, season, length of project, etc. The City will review it for completeness and for the appropriateness of the BMPs. The inspection program described in Section 5.6 is implemented by the City to verify the effectiveness of the submitted and approved construction BMP plan and BMPs, and to identify any required modifications.

5.6 Construction Site Inspections Requirements

Permit Requirement:	Provision E.4.d
Title:	Construction Site Inspections
Brief Description:	The City must implement a construction site inspection program to verify compliance with the requirements in permits, ordinances and the Permit that meets the minimum requirements for frequency, content, and tracking and records.
Permit Page Number:	97 of 127

According to Permit Provision E.4.d, the City must conduct construction site inspections to require and confirm compliance with its local permits and applicable local ordinances, and with the requirements of the Permit. Priority for site inspections must consider threat to water quality as described by the criteria presented in Section 5.3.2, as well as the nature of the construction activity, topography, and the characteristics of soils and receiving water quality.

The Permit states the minimum inspection frequencies and content that must be considered by the City as described below.



5.6.1 Inspections Frequency

Permit Provision E.4.d.(1) requires the City to meet the following in establishing inspection frequencies for its construction sites:

1. The City must conduct inspections at all inventoried sites, including high threat to water quality sites, at an appropriate frequency for each phase of construction to confirm the site reduces the discharge of pollutants in storm water from construction sites to the MEP, and effectively prohibits non-storm water discharges from entering the MS4.
2. The City must establish appropriate inspection frequencies for high threat to water quality sites, and all other sites, for each phase of construction. Inspection frequencies appropriate for addressing the highest water quality priorities identified in the San Diego WQIP, and for complying with the requirements of the Permit, must be identified in this JRMP.
3. Based upon inspection findings, the City must implement all follow-up actions (i.e., re-inspection, enforcement) necessary to require and confirm site compliance with its local permits and applicable local ordinances, and the requirements of the Permit.

The City's implementation strategy to comply with this requirement is presented in Section 5.6.3.

5.6.2 Inspection Content

Permit Provision E.4.d.(2) specifies the minimum content of inspections conducted by the City at construction sites. The minimum requirements are:

1. Verification of coverage under the CGP of a Notice of Intent and/or WDID number during initial inspections, when applicable;
2. Assessment of compliance with local permits and applicable local ordinances related to pollution prevention, including the implementation and maintenance of applicable BMPs;
3. Assessment of BMP adequacy and effectiveness;
4. Visual observations of actual non-storm water discharges;
5. Visual observations of actual or potential discharge of sediment and/or construction related materials from the site;
6. Visual observations of actual or potential illicit connections; and
7. If any violations are found and BMP corrections are needed, inspectors must take and document appropriate actions in accordance with the Enforcement Response Plan (ERP) (see JRMP Section 2).



The City's implementation strategy to comply with this requirement is presented in Section 5.6.3.

5.6.3 Implementation of Inspection Frequency and Content

To comply with Permit provisions E.4.d.(1) and (2), the City implements a construction inspection program that includes an initial site inspection upon issuance of the building permit for the construction activity, including demolition. Inspections are established at minimum to meet the minimum frequencies shown in Table 5-4. More frequent inspections may take place based on site conditions, workload, compliance pattern, available resources, etc. A final inspection is conducted to verify removal of BMPs and completion of construction activities.

**Table 5-4
Minimum Construction Site Inspection Frequencies**

Threat Level	Minimum Inspection Frequency	Notes
High	Biweekly	Permit required minimum
Medium	As needed	At minimum, initial and closure.
Exempt	As needed	As time allows based on other priorities; primarily through "patrols" of the City

Inspection frequencies are entered in TRACKiT and assigned to inspector(s) once the building permit(s) are issued for the construction site. Inspections are tracked as part of the storm water permit issued for each construction site. Inspection content, at minimum, includes the required items per the Permit and all inspections are recorded on standard forms. All violations or corrective actions are followed up on by the inspector and logged in a new inspection form, as needed. Once a site's construction activities are verified as completed, the final inspection is logged in TRACKiT and the storm water permit is closed.

5.6.4 Inspection Tracking and Records Requirements

Per Permit Provision E.4.d.(3), the City must track all inspections and re-inspections at all inventoried construction sites. The City must retain all inspection records in an electronic database or tabular format, which must be made available to the San Diego Water Board upon request. Inspection records must include, at a minimum:

1. Site name, location (address and hydrologic subarea⁴), and WDID number (if applicable);

⁴ Hydrologic subarea is not tracked in Coronado since the City is entirely located in Coronado HSA 910.1.



2. Inspection date;
3. Approximate amount of rainfall since last inspection;
4. Description of problems observed with BMPs and indication of need for BMP addition/repair/replacement and any scheduled re-inspection, and date of re-inspection;
5. Descriptions of any other specific inspection comments which must, at a minimum, include rationale for longer compliance time;
6. Description of enforcement actions issued in accordance with the ERP (JRMP Section 2, pursuant to Permit Provision E.6); and
7. Resolution of problems noted and date problems fixed.

The City's implementation strategy to comply with this requirement is presented in Section 5.6.5.

5.6.5 Inspection Tracking and Records Implementation

Inspections are tracked and recorded in TRACKiT for each active storm water permit. Inspections are tracked and recorded with inspection forms attached with each inspection record. Inspection status reports are generated and prepared monthly, at minimum, to verify workload and inspections completed, pending, etc. Inspections end when the project site is complete and the storm water permit is closed in TRACKiT. The City has a construction inspection form that includes all the required fields as noted in Section 5.6.4. The inspection form is found in the Storm Water Standards Manual, Section 3-A.

5.7 Construction Site Enforcement Requirements

Permit Requirement:	Provision E.4.e
Title:	Construction Site Enforcement
Brief Description:	The City must enforce per its ordinance(s) to achieve compliance as stated in the JRMP's Enforcement Response Plan.
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Per Permit Provision E.4.e, the City must enforce its legal authority established pursuant to Permit Provision E.1 (see JRMP Section 2) for all its inventoried construction sites to achieve compliance with the requirements of the Permit, in accordance with its ERP.

The City has established its legal authority to enforce standards and requirements applicable to all development projects through the City's municipal code and the development of standards and guidelines as part of the Storm Water Standards Manual.



The City has developed and implements an ERP as part of this JRMP and it is found, along with the legal authority documentation, in Section 2 of this JRMP.

5.8 Annual Reporting

A comprehensive annual reporting plan to meet the requirements in the Permit is included in Section 9 of this JRMP.

The minimum annual reporting requirements listed in the Permit are found in Permit Appendix D-3, the Jurisdictional Runoff Management Program Annual Report Form (Annual Report Form). The Annual Report Form includes the following items related to the Construction Management Program component:

Answers (yes or no) to the following question:

1. Has the City implemented a construction management program that complies with Order No. R9-2013-0001?

Reporting of the following data or statistics:

1. Number of construction sites in inventory
2. Number of active construction sites in inventory
3. Number of inactive construction sites in inventory
4. Number of construction sites closed/completed during the reporting period
5. Number of construction site inspections
6. Number of construction site violations
7. Number of enforcement actions issued
8. Number of escalated enforcement actions issued

The Permit is not clear on the definition of each of the above items, nor does it provide an explanation of the field or entries to be submitted in the Annual Report Form. To assist City staff in consistently reporting data from year-to-year, the definitions or clarifications provided in Table 5-4 were developed as part of the JRMP preparation process⁵.

⁵ Note: these definitions were applied with the Annual Report form starting in FY 2013-14.



**Table 5-4
Annual Report Form Definitions for Construction Management**

Reporting Item	Definition or Clarification
Number of construction sites in inventory	All projects with final approval and issued a storm water permit. Includes medium and high threat projects. In TRACKiT number of sites issued a storm water permit. In TRACKiT query report PERM130SW to filter for storm water permits.
Number of active construction sites in inventory	Construction sites that have on-going construction including demolition. In TRACKiT all sites with active construction as noted in the database.
Number of inactive construction sites in inventory	Construction sites that do not have active and on-going construction including demolition for more than 14 calendar days. In TRACKiT all sites with inactive construction as noted in the database.
Number of construction sites closed/completed during reporting period	Construction sites verified through inspection to be completed and with a “finaled” storm water permit. In TRACKiT the number of active construction sites shown as “finaled”.
Number of construction site inspections	Number of inspections conducted during the reporting period for all active and inactive sites. Reported through TRACKiT.
Number of construction site violations	Notice of Violation (NOV) or higher violation issued
Number of enforcement actions issued	Enforcement action NOV or higher
Number of escalated enforcement actions issued	Any enforcement action issued for the same type of violation taken to the next level (e.g., Warning-> NOV or NOV -> stop work order/CDO, etc.)

In order to meet the reporting requirements, the City has established a variety of computer-aided tools or programs that facilitate data tracking and management. The primary tool is the TRACKiT permitting program which is used citywide.

Essential data tracking, management, and reporting tools for the Construction Management component of the JRMP are:

1. Continuing the support and use of the TRACKiT system;
2. Creating storm water permits for all projects categorized as medium or high threat to water quality due to construction activities;
3. Maintaining and verifying data in the TRACKiT system for accuracy and completeness;
4. Entering inspections frequencies and inspectors to generate inspection records, tracking completed inspections and uploading inspection forms in TRACKiT; and
5. Documenting all enforcement actions issued in TRACKiT.



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6.1 Existing Development Management Requirements

Permit Requirement:	Provision E.5
Title:	Existing Development Management
Brief Description:	The City must implement an existing development management program that aligns with the strategies in the San Diego Bay WQIP that also includes the minimum requirements described in the Permit.
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Existing development is defined as “any area that has been developed and exists for municipal, commercial, industrial, or residential purposes, uses, or activities” (Permit Appendix C). Furthermore, it “may include areas that are not actively used for its originally developed purpose, but may be re-purposed or redeveloped for another use or activity.”

Existing development includes any area, active and inactive, that has a purpose, use or activity designated as municipal, commercial, industrial or residential.

The Permit requires that the City implement an existing development management program in accordance with the strategies in the San Diego Bay Water Quality Improvement Plan (WQIP) and includes, at a minimum, the following requirements:

1. Existing Development Inventory and Tracking (Permit Provision E.5.a);
2. Existing Development Best Management Practice (BMP) Implementation and Maintenance (Permit Provision E.5.b);
3. Existing Development Inspections (Permit Provision E.5.c);
4. Existing Development Enforcement (Permit Provision E.5.d); and
5. Retrofitting and Rehabilitating Areas of Existing Development (Permit Provision E.5.e).

This JRMP section describes the details of the City’s existing development management program compliant with the requirements of the Permit, starting in Section 6.4.

6.2 Jurisdictional Strategies – San Diego Bay WQIP

The San Diego Bay WQIP describes the role and purpose of jurisdictional strategies in detail and may be consulted for a more comprehensive understanding of the selection of high priority or focused water quality conditions in the San Diego Bay watersheds. In summary, the San Diego Bay WQIP identified for the Coronado Hydrologic Sub-Area (HSA) No. 910.1 a focused priority condition or goal of swimmable waters (beaches) with bacteria as the targeted pollutant



to be addressed in order to achieve the goal. The City developed a list of jurisdictional strategies as part of the San Diego Bay WQIP that will support the goal of swimmable waters. In Section 4, Figure 4-1 depicts the Coronado HSA in relationship to the City's jurisdictional boundary.

Activities and programs that are not directly linked to the San Diego Bay WQIP and its jurisdictional strategies are only subject to the City's core elements in accordance with the Permit.

6.3 Implementation of Jurisdictional Strategies

Coronado's jurisdictional strategies include activities associated with existing development areas specifically targeting bacteria sources that can impact the goal of swimmable water (beaches). Existing development areas have the potential to contribute bacteria through sediment, erosion or other construction related activities. The City will verify the selection of BMPs and require, if needed, additional or specific construction BMPs to reduce or eliminate the potential impact on receiving waters (beaches). The full table of jurisdictional strategies is reproduced from the San Diego Bay WQIP and presented in Section 1-C of the Storm Water Standards Manual. In summary, the jurisdictional strategies for the existing development component of the JRMP are listed below by type of development:

6.3.1 Commercial and Residential Facilities and Areas

The City has developed six jurisdictional strategies, taken from the San Diego Bay WQIP, related to commercial and residential facilities and areas to support the goal of swimmable water.

1. Implement and enforce property and pollutant generating area-based inspections at increased frequency for identified and targeted high priority sources of bacteria (compared to minimum Permit requirements), as applicable.
2. Evaluate sweeping and maintenance of private roads and parking lots in targeted areas. Consider adding to City sweeping program.
3. Implement program to require retrofit of trash enclosures for persistent and problematic sources.
4. Maintain existing pet waste program. Including installation and maintenance of pet waste bag dispensers and trash bins. May include signage and education, physical removal of pet waste, or enforcement.
5. Promote, as available, residential BMP (irrigation, rainwater harvesting, and turf conversion) programs that may include rebate programs in target areas.



6. Promote and collaborate with water agencies and other groups to encourage implementation of water conservation programs that improve water quality by reducing over-irrigation with smart products or turf replacement and capturing rain water in residential areas.

6.3.2 Municipal Facilities and Areas

The City has developed two jurisdictional strategies related to municipal facilities and areas to support the goal of swimmable water.

1. Conduct enhanced beach maintenance activities to remove trash and debris, place additional trash cans during peak periods, and replenish dog bag dispensers.
2. Identify Focused Priority Conditions in municipal facilities and areas to identify specific BMPs to reduce sources (e.g., special events).

6.3.3 Municipal Separate Storm Sewer System

The City has developed four jurisdictional strategies related to Municipal Separate Storm Sewer Systems (MS4) facilities to support the goal of swimmable water.

1. Implementation of operation and maintenance (O&M) activities (inspection and cleaning) for MS4 and related structures (catch basins, storm drain inlets, diversion structures, etc.) for optimum water quality.
 - a. Perform MS4 inspection and cleaning at higher frequency for high debris areas.
 - b. Evaluate MS4 inspection and cleaning locations and adjust high frequency to target new/modified high debris areas.
 - c. Proactively repair and replace MS4 components to maintain proper operation and function.
 - d. Proactively operate, maintain, repair and replace urban runoff diverters to sanitary sewer.
 - e. Proactively repair and replace corrugated metal pipe MS4 components to provide source control from MS4 infrastructure.
2. Implementation of O&M activities (inspection and cleaning) for sanitary sewer system and related structures for optimum operation.
3. Implement controls to prevent infiltration of sewage into the MS4 from leaking sanitary sewers.



4. Identify sewer leaks and areas for sewer pipe replacement prioritization and timely repair.

6.3.4 Roads, Streets and Parking Lots

Similarly, the City has developed three jurisdictional strategies related to roads, streets and parking lots to support the goal of swimmable water.

1. Perform sweeping of high-volume streets at enhanced frequency.
2. Implement street sweeping public education, temporary posting and towing as needed to accomplish sweeping goals.
3. Implement maintenance of bike lanes by proactively monitoring for erosion and completing minor repair and slope stabilization.

6.3.5 Existing Development Facilities and Areas as Potential Pollutant Sources – Bacteria

The San Diego Bay WQIP provides general guidance on the potential sources of bacteria and it includes existing development facilities and areas. Table 6-1 has been incorporated (with minor modifications) from Appendix G of the San Diego Bay WQIP and provides a general inventory of the types of facilities and potential pollutants. The bacteria/pathogen column shows that activities or sources likely (L) to contribute bacteria or pathogens to storm water or urban runoff include animal facilities (including pet care and pet services), food establishments, and residential areas. Therefore, existing development activities will target specific sources of bacteria from these facilities and areas.



Table 6-1
Pollutant Generating Sources – 910.1 Coronado Hydrologic Subarea
(Based on and edited from San Diego Bay WQIP Table G-8)*

Inventory Sites/Facilities**	Pollutant Source Loading Potential***							
	Heavy Metals	Organics	Oil & Grease	Sediment	Pesticides	Nutrients	Gross Pollutants	Bacteria/ Pathogens
Animal	N	L	UL	L	UK	L	UK	L
Automotive	L	L	L	UL	UL	UK	L	UL
Contractor	UL	UL	UL	L	UL	UL	L	UL
Food Establishment	N	L	L	UL	UK	UK	L	L
Equipment	L	L	L	UL	UL	UK	L	UL
General Retail	UL	UL	UL	L	UL	UL	L	UL
Municipal	L	L	L	L	UK	UK	UK	UL
Construction	UL	UL	UL	L	UL	UL	L	UL
Residential	L	L	L	L	L	L	UK	L

*Non-applicable categories deleted (e.g., General Industrial). Prepared based on the WURMP Copermittees FY 2012 JURMP Annual Reports.

**Other sources are not reported in this table including: Land Development and Non-inventoried Businesses

***Pollutant Source Loading Potential taken from BLTEA 2005 and LTEA 2011; N = None, UK = Unknown, UL = Unlikely, L = Likely

None (N) includes sources with zero identified pollutant generating activities and low discharge potential.

Unknown (UK) includes sources with one or more identified pollutant generating activities, but very low discharge potential.

Unlikely (UL) includes sources with no pollutant generating activities, but high discharge potential, or sources with moderate discharge potential and one or more pollutant generating activities.

Likely (L) includes sources with high discharge potential and identified pollutant generating activities.

6.4 Existing Development Inventory and Tracking

Permit Requirement:	Provision E.5.a
Title:	Existing Development Inventory and Tracking
Brief Description:	The City must maintain, and update annually, an inventory of existing development facilities and areas to meet the minimum requirements in the Permit.
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Permit Provision E.5.a requires that the City maintain, and update at least annually, a watershed-based inventory of the existing development within its jurisdiction that may discharge a pollutant load to and from the MS4. The use of an automated database system, such as geographic information system (GIS), is highly recommended.



6.4.1 Existing Development Inventory and Tracking Requirements

The Permit requirements for the inventory and tracking are summarized below as they pertain to the City of Coronado. The inventory must, at a minimum, include:

1. Name, location (hydrological subarea and address, if applicable¹) for:
 - a. Commercial facilities or areas;
 - b. Industrial facilities²;
 - c. Municipal facilities³;
 - I. MS4 and related structures,
 - II. Roads and streets,
 - III. Parking facilities,
 - IV. Parks and recreational facilities,
 - V. Sanitary sewer collection systems,
 - VI. Corporate, maintenance and storage yards used for materials, waste, equipment, and vehicles, and/or
 - VII. Hazardous waste collection facilities.
 - d. Residential areas, which may be designated by one or more of the following⁴:
 - I. Residential management area, and/or
 - II. Drainage basin or area.
2. Description of the facility or area, including:
 - a. Classification as commercial, industrial, municipal, or residential;
 - b. Status of facility or area as active or inactive;
 - c. Identification if a business is a mobile business;
 - d. Standard Industrial Classification (SIC) Code or NAICS Code, if applicable;
 - e. Industrial General Permit Notice of Intent and/or Waste Discharge Identification (WDID) number, if applicable;
 - f. Identification if a residential area is or includes a Common Interest Area/Home Owner Association, or mobile home park;
 - g. Identification of pollutants generated and potentially generated by the facility or area;
 - h. Whether the facility or area is adjacent to an Environmentally Sensitive Area (ESA); and

¹ Not applicable in Coronado. The City's entire jurisdictional area is located in the Coronado HSA.

² Coronado has been tracking industrial facilities since 2007 and has only identified one potential Industrial General Permittee, a taxi services business that does not have a permanent location or facility. Industrial facilities are not an area of focus for the City's existing development program.

³ Municipal facilities have been narrowed down from the original Permit list to those that are found in Coronado only.

⁴ The Permit lists eight ways to designate residential areas. The list was narrowed to those that are applicable.



- i. Whether the facility or area is tributary to and within the same hydrologic subarea as a water body segment listed as impaired on the Clean Water Act (CWA) section 303(d) list and generates pollutants for which the water body segment is impaired.
3. An annually updated map showing the location of inventoried existing development, watershed boundaries, and water bodies.

6.4.2 Existing Development Inventory and Tracking Implementation

The City has a complete inventory of existing development facilities and areas. The inventory is updated under the following conditions:

1. As a result of inspections of commercial and municipal areas or activities that identify changes in the information contained in the inventory;
2. Annually, at minimum, as part of the annual report preparation tasks; and
3. Periodically from information obtained as a result of issuance of a new business license.

Existing development residential areas have been designated in Coronado to include:

1. The Village Area – the area that is bordered by Avenida Lunar to the south, the Pacific Ocean to the west, and San Diego Bay to the north and east, excluding The Shores.
2. The Coronado Cays – the area bordered by Coronado Cay Road on the north, San Diego Bay on the east, SR 75 (Silver Strand Boulevard) on the west, and the terminus of Tunapuna Lane on the south.
3. The Shores – the area that is bordered by the Hotel Del Coronado to the north, the Pacific Ocean to the west, SR 75 (Silver Strand Boulevard) on the east, and Avenida Lunar to the south.

The existing development inventory, as of May 2015, is presented in the Storm Water Standards Manual, Section 6-A. The latest version of the existing development inventory is available in the Storm Water Division electronic files or JRMP annual report.



6.5 Existing Development BMP Implementation and Maintenance

Permit Requirement:	Provision E.5.b
Title:	Existing Development BMP Implementation and Maintenance
Brief Description:	The City must designate a minimum set of BMPs required for all inventoried existing development, including special event venues.
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Per Permit Provision E.5.b, the City must designate a minimum set of BMPs required for all inventoried existing development, including special event venues. The designated minimum BMPs must be specific to facility or area types and pollutant generating activities, as appropriate.

6.5.1 Existing Development BMP Implementation and Maintenance Requirements

The minimum BMPs for existing development are required for all four categories of facilities and areas:

1. Commercial,
2. Industrial⁵,
3. Municipal, and
4. Residential.

Per Permit Provision E.5.b.(1)(a)-(d), the City must identify the requirements and needs for each of these categories:

1. Pollution prevention,
2. BMP implementation,
3. BMP O&M, and
4. Pesticides, Herbicides, and Fertilizers BMPs.

The implementation approach differs in the following ways. For commercial, industrial, and municipal facilities and areas, the City must define the required pollution prevention, BMP implementation, O&M of BMPs, and the pesticide, herbicide, and fertilizer BMPs (Permit Provision E.5.b.(1)). It must also place the emphasis on the selected jurisdictional strategies from the San Diego Bay WQIP associated with them.

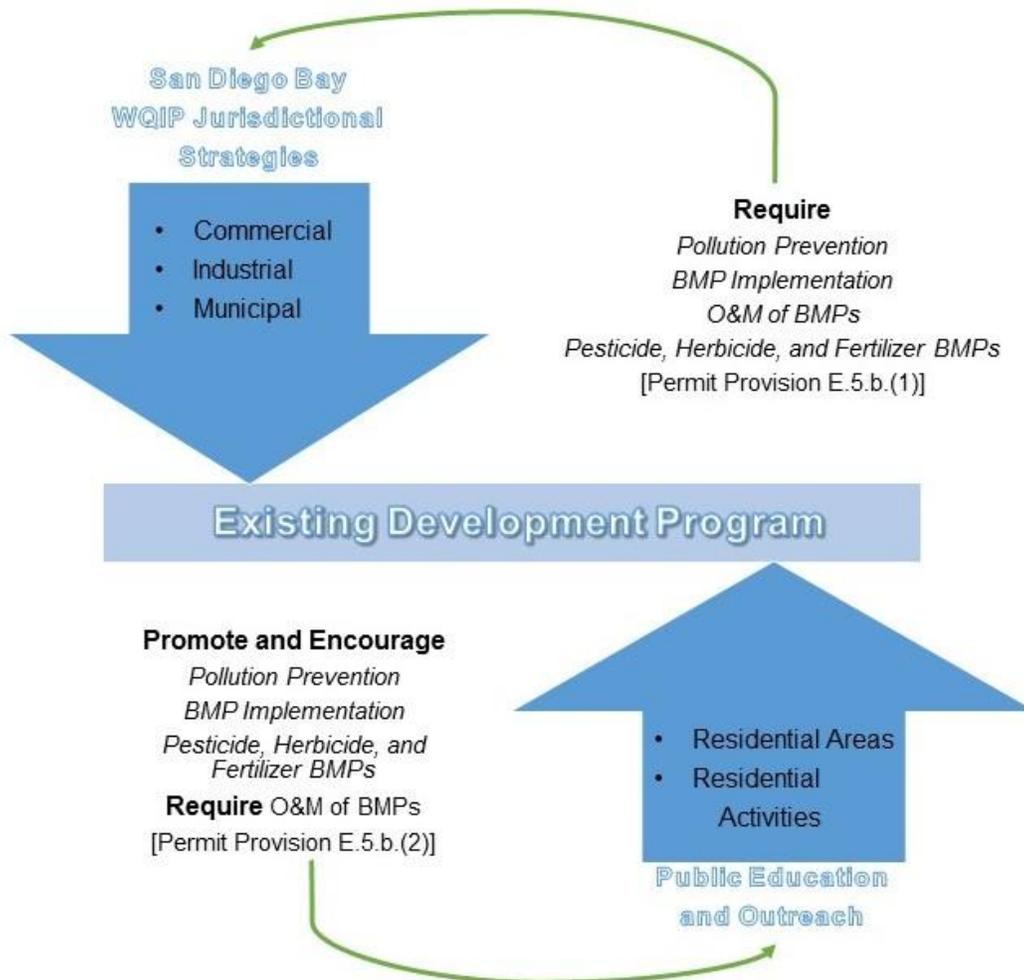
⁵ No industrial facilities are found in Coronado. See Section 6.5.3 for explanation.



For residential activities and areas, the City must promote and encourage pollution prevention; BMP implementation; and pesticide, herbicide, and fertilizer BMPs; and must require O&M of BMPs. For residential areas, the implementation is linked to the City's Public Education and Outreach Program (JRMP Section 7). The overall existing development program implementation strategy is represented graphically in Figure 6-1.

For residential activities and areas, public education and outreach will be the main mechanism to promote and encourage pollution prevention; BMP implementation; and pesticide, herbicide, and fertilizer BMPs. In addition, the City will implement routine residential "patrols" to visually identify any deficiencies in the implementation of appropriate BMPs and any illicit discharges from non-storm water sources.

Figure 6-1
Existing Development Program Implementation Strategy





This section is organized to present each of the existing development categories and within each category the implementation strategies or procedures are identified.

6.5.1.1 Pollution Prevention BMPs

Pollution Prevention is defined in the Permit as “practices and processes that reduce or eliminate the generation of pollutants, in contrast to source control BMPs, treatment control BMPs, or disposal” in Permit Appendix C-8.

Pollution prevention BMPs include a variety of practices and processes selected and integrated into activities to reduce or eliminate the generation (or use) of pollutants. California Stormwater Quality Association’s (CASQA’s) Industrial and Commercial BMP Handbook (2014) categorizes pollution prevention to consist mainly of non-structural BMPs. Non-structural BMPs “consist of processes, prohibitions, procedures, schedule of activities, etc. that prevent pollutants associated with (industrial) activity from entering stormwater”. Pollution prevention BMPs may also include good housekeeping practices, implementing practices to eliminate non-storm water discharges, safer alternative product purchasing practices, personnel training, material use practices, etc.

The City of Coronado’s pollution prevention minimum BMPs are based on the prohibition of illicit discharges of non-storm water as described in Sections 3.3 through 3.5 of this JRMP. Non-storm water discharges considered illicit discharges are summarized in Table 3-1 and the minimum BMPs are listed in Table 3-2.

In addition, the City may consider requiring additional pollution prevention BMPs related to improving compliance with non-storm water discharge prohibitions, including: employee/staff training, posters, markings (e.g., inlet), recommendations on material use or substitution, etc. These BMPs are required on a case-by-case basis depending on inspection findings or practices.

6.5.1.2 Source Control BMPs

Source Control BMPs are defined in the Permit as “land use or site planning practices, or structural and non-structural measures that aim to prevent runoff pollution by reducing the potential for contamination at the source of pollution. Source Control BMPs minimize the contact between pollutants and runoff” per Permit Appendix C-8.

Source control BMPs prevent contact between storm water at the pollution source and can be structural or non-structural. The City will define structural controls BMP to be equivalent to source control BMPs to distinguish them from pollution prevention BMPs which will be non-structural (Section 6.5.1.1). Examples of source control structural BMPs include constructing a cover over an activity area to prevent contact with rainfall and secondary containment (e.g.,



berm areas, storage sheds). Source control BMPs are preferred over treatment control BMPs because they can be highly effective at preventing pollution if implemented properly and are usually.

The majority of the BMPs for compliance with Permit Provision E.5.b.(1)(b) are directed at source control.

6.5.2 Commercial Development BMP Implementation and Maintenance Program Implementation

Structural BMPs are defined in the Permit as “a subset of BMPs which detains, retains, filters, removes, or prevents the release of pollutants to surface waters from development projects in perpetuity” per Permit Appendix C-8.

CASQA defines structural BMPs to be “generally physical facilities that prevent the pollutants from reaching stormwater, such as a roof cover. Others treat or remove pollutants in stormwater, such as detention basins.”

The City of Coronado has an established inventory of commercial facilities, of which the majority (80-90%) are food establishments, with the remainder providing services in automotive, pet care, and health care. The remaining commercial businesses that are not subject to storm water program requirements are retail, medical offices, and professional services (e.g., accounting, legal). The commercial inventory, as of May 2015, is provided in Storm Water Standard Manual, Section 6-A, and will be updated at minimum on an annual basis as part of the annual report. The City also includes mobile businesses as part of the commercial inventory, but it should be noted that they have not been identified by the City as a major source of or a contributor to MS4 pollution. The mobile business sector includes auto detailers and construction activities (e.g., masonry, painters, roofers) that are subject to requirements based on those activities and inspected as part of that program component.

The selection of BMPs is also aimed at the San Diego Bay WQIP focused priority water quality condition goal of swimmable waters (beaches) and targets bacteria sources to meet this goal.

6.5.2.1 Commercial Pollution Prevention

The City requires pollution prevention measures for commercial facilities, if applicable, as follows:

1. Good Housekeeping
2. Non-storm Water Discharge Prohibitions (JRMP Sections 3.3 through 3.5)

Storm Water Standards Manual

CASQA BMP for Pollution Prevention

- SC-10 Non-storm Water Discharges
- SC-11 Spill Prevention, Control and Clean-up
- SC-35 Safer Alternative Products
- SC-60 Housekeeping Practices



- a. Storm drain marking and placards
- b. Routine maintenance of storage area
- 3. Employee Training, Knowledge
- 4. Spill Prevention, Control and Clean-up
 - a. Proper containment, cover
 - b. Storage, and disposal of solid/liquid/fluid spill
 - c. Effective recycling/reuse
- 5. Safe Alternative Product Purchase and Use

The City may support these and additional BMP selections, as needed, by referencing the CASQA BMP Handbooks for Municipal and/or Industrial & Commercial to facilitate pollutant control and minimization of discharges to the MS4.

The emphasis of the City’s commercial BMP implementation is on the food establishment sector and includes administration of the Food Establishment Wastewater Discharge (FEWD) permit program to minimize fats, grease and oil discharges to the sanitary sewer. The FEWD program has a role in storm water discharge pollution prevention for this business sector by reducing and eliminating sanitary sewage spills and discharges that may enter the MS4 and/or receiving waters. In Coronado, FEWD and storm water program requirements and BMPs overlap or are synergistic and have the same common goal.

6.5.2.2 Commercial BMP Implementation

In addition to pollution prevention BMPs, the City may require, as applicable, the implementation of the following BMPs in the specified categories that represent the most common types of commercial activities or areas:

- 1. Vehicle and Equipment Fueling, Cleaning and Repair
 - a. Proper disposal of solid/liquid/fluid spill
 - b. Proper drainage of fluids
 - c. Dry methods and mechanical cleaning (self-contained)
 - d. Proper collection and disposal of water
 - e. Proper handling of material and waste
- 2. Materials and Waste Management
 - a. Outdoor loading/unloading
 - b. Outdoor container storage
 - c. Outdoor equipment operations
 - d. Outdoor storage raw materials
 - e. Waste handling and disposal

Storm Water Standards Manual

CASQA BMP for Vehicle and Equipment

- SC-20 Fueling
- SC-21 Cleaning
- SC-22 Repair

Storm Water Standards Manual

CASQA BMP for Materials and Waste Management

- SC-30 Outdoor Loading/Unloading
- SC-31 Outdoor Container Storage
- SC-32 Outdoor Equipment Operations
- SC-33 Outdoor Storage Raw Materials
- SC-34 Waste Handling & Disposal



3. Building and Grounds Maintenance
 - a. Building, grounds maintenance
 - b. Building repair and construction
 - c. Parking/storage area maintenance
 - d. Drainage system maintenance
 - i. Contained pressure washing
 - ii. Proper waste disposal-repair, remodeling, and construction
 - iii. Proper landscaping practices
 - iv. Proper maintenance of catch basins/inlets
 - v. Routine inspections for illicit connection/discharge, dumping

Storm Water Standards Manual
 CASQA BMP for Building and Grounds Maintenance

- SC-41 Building, Grounds Maintenance
- SC-42 Building Repair & Construction
- SC-43 Parking/Storage Area Maintenance
- SC-44 Drainage System Maintenance

The City may support these and additional BMP selections, as needed, by referencing the CASQA BMP Handbooks for Municipal and/or Industrial & Commercial to facilitate pollutant control and minimization of discharges to the MS4.

6.5.2.3 Operation and Maintenance of Commercial BMPs

Permit Provision E.5.b.(1)(c)(i) states that the City must require the proper O&M of designated BMPs at commercial facilities and areas in its inventoried existing development. The City has selected the BMPs described in Section 6.5.2.2 and referenced CASQA BMP Fact Sheets for their proper implementation, including O&M requirements. The City will rely primarily on the O&M requirements for each BMP in the CASQA Fact Sheets and as identified during inspections. BMP inspection, maintenance, repair and upgrading is also support by Coronado Municipal Code (CMC) 61.08.040.C.

Storm Water Standards Manual
 CASQA BMP for Pesticide, Herbicide, and Fertilizer

- SC-10 Non-Stormwater Discharges
- SC-11 Spill Prevention, Control and Cleanup
- SC-30 Outdoor Loading/Unloading
- SC-31 Outdoor Container Storage
- SC-33 Outdoor Storage Raw Materials
- SC-34 Waste Handling & Disposal
- SC-35 Safer Alternative Products
- SC-60 Housekeeping Practices
- SC-73 Landscape Maintenance

6.5.2.4 Pesticide, Herbicide, and Fertilizer BMPs

Permit Provision E.5.b.(1)(d) states that the City must require the implementation of BMPs to reduce pollutants in storm water discharges to the Maximum Extent Practicable (MEP) and effectively prohibit non-storm water discharges associated with the application, storage, and disposal of pesticides, herbicides and fertilizers from commercial facilities and areas, and industrial facilities, and implement BMPs at municipal facilities in its inventoried existing development. Such BMPs must include, as appropriate,



educational activities, permits, certifications and other measures for applicators and distributors. The City will rely primarily on the O&M requirements for each BMP in the CASQA BMP Fact Sheets and as identified during inspections. CASQA BMP Fact Sheets are found in the City's Storm Water Standards Manual.

6.5.3 Industrial Development BMP Implementation and Maintenance Program Implementation

Permit Provision E.5.b.(1)(c) requires development of a BMP strategy for industrial development. The City of Coronado does not have any industrial facilities in the inventory and has not designated any specific BMPs. BMPs will be selected and required based on the type of facility and operations. The designation of BMPs for industrial facilities in Coronado will be on a case-by-case basis and documented as appropriate in inspection reports or comparable. CMC 61.08.040 and 61.08.070 support the City's requirement of BMPs for industrial development and the installation, implementation, and O&M of designated BMPs.

6.5.4 Municipal Development BMP Implementation and Maintenance Program Implementation

6.5.4.1 Municipal Pollution Prevention

The City requires pollution prevention measures for municipal areas and facilities, if applicable, as follows:

1. Good Housekeeping
2. Non-storm Water Discharge Prohibitions (JRMP Sections 3.3 through 3.5)
 - a. Storm drain marking and placards
 - b. Routine maintenance of storage area
3. Employee Training, Knowledge
4. Spill Prevention, Control and Clean-up
 - a. Proper containment, cover
 - b. Storage, and disposal of solid/liquid/fluid spill
 - c. Effective recycling/reuse
5. Safe Alternative Product Purchase and Use

Storm Water Standards Manual

CASQA BMP Pollution
Prevention for Municipal
Areas and Activities
CASQA BMP

- SC-10 Non-storm Water Discharges
- SC-11 Spill Prevention, Control and Clean-up
- SC-60 Housekeeping Practices
- SC-61 Safer Alternative Products

6.5.4.2 Municipal BMP Implementation

The City requires, as applicable, the implementation of the following BMPs in the specified categories that represent the most common types of municipal activities or areas. The majority of the priority municipal activities, potential sources of pollutants, are located at the main Public Services and Engineering Department corporation yard. The City's main corporation yard is the location of the hazardous and household hazardous waste collection facility and other activities.



BMPs are designated in the inventory of municipal facilities, but may be modified using Best Professional Judgment (BPJ) and as a result of field inspections or other factors. BMPs generally apply as follows:

1. Vehicle and Equipment Fueling, Cleaning and Repair
 - a. Proper disposal of solid/liquid/fluid spill
 - b. Proper drainage of fluids
 - c. Dry methods and mechanical cleaning (self-contained)
 - d. Proper collection and disposal of water
 - e. Proper handling of material and waste

2. Materials and Waste Management
 - a. Outdoor loading/unloading
 - b. Outdoor container storage
 - c. Outdoor equipment operations
 - d. Outdoor storage raw materials
 - e. Waste handling and disposal
 - f. Safer alternative products
 - i. Standard Operating Procedure (SOPs)
 - ii. Leak and spill control, clean-up kit(s)
 - iii. Maintenance of storage facility
 - iv. Proper containment of raw materials

3. Building and Grounds Maintenance
 - a. Building, grounds maintenance
 - b. Building repair and construction
 - c. Parking/storage area maintenance
 - d. Drainage system maintenance
 - i. Contained pressure washing
 - ii. Proper waste disposal-repair, remodeling, and construction
 - iii. Proper landscaping practices
 - iv. Proper maintenance of catch basins/inlets
 - v. Routine inspections for illicit connection/discharge, dumping

Storm Water Standards Manual

CASQA BMP for Vehicle and Equipment

- SC-20 Fueling
- SC-21 Cleaning
- SC-22 Repair

Storm Water Standards Manual

CASQA BMP for Outdoor Municipal Areas and Activities

- SC-30 Outdoor Loading/Unloading
- SC-31 Outdoor Container Storage
- SC-32 Outdoor Equipment Operations
- SC-33 Outdoor Storage Raw Materials
- SC-34 Waste Handling & Disposal

Storm Water Standards Manual

CASQA BMP for Municipal Building and Grounds Maintenance

- SC-41 Building, Grounds Maintenance
- SC-42 Building Repair & Construction
- SC-43 Parking/Storage Area Maintenance
- SC-44 Drainage System Maintenance



4. Field Operations

- a. Road and street maintenance
- b. Plaza and sidewalk maintenance
- c. Fountains and pools maintenance
- d. Landscape maintenance
- e. Drainage system maintenance
- f. Waste handling and disposal
- g. Water and sewer utility maintenance

Storm Water Standards Manual

CASQA BMP for Municipal Field Operations

- SC-70 Road and Street Maintenance
- SC-71 Plaza and Sidewalk Cleaning
- SC-72 Fountain and Pool Maintenance
- SC-73 Landscape Maintenance
- SC-74 Drainage System Maintenance
- SC-75 Waste Handling and Disposal
- SC-76 Water and Sewer Utility Maintenance

6.5.4.3 Operation and Maintenance of Municipal BMPs

Permit Provision E.5.b.(1)(c)(i) requires that the City consider the following in setting the O&M of BMPs used and/or installed for municipal facilities and activities: the City must properly operate and maintain, or require the proper O&M of designated BMPs at municipal facilities in its inventoried existing development.

The City has selected the BMPs described in Section 6.5.4.2 and referenced CASQA BMP Fact Sheets for their proper implementation, including O&M requirements. The City will rely primarily on the O&M requirements for each BMP in the CASQA Fact Sheets and as identified during inspections. BMP Fact Sheets are found in the City's Storm Water Standards Manual.

In addition, BMP installation, implementation, and O&M is support by CMC 61.08.040 and 61.08.080.

6.5.4.4 Pesticide, Herbicide, and Fertilizer BMPs

See Section 6.5.2.4 for Pesticide, Herbicide, and Fertilizer BMPs applicable to municipal facilities and activities.

6.5.5 MS4 Operation and Maintenance Activities Requirements

In addition, Permit Provision E.5.b.(1)(c)(ii) requires the following for MS4 O&M activities:

1. The City must implement a schedule of O&M activities for its MS4 and related structures (including but not limited to catch basins, storm drain inlets, detention basins, etc.), and verify proper operation of all its municipal structural treatment controls designed to reduce pollutants (including floatables) in storm water discharges to or from its MS4s and related drainage structures. O&M activities may include, but are not limited to, the following:
 - a. Inspections of the MS4 and related structures;



- b. Cleaning of the MS4 and related structures; and
 - c. Proper disposal of materials removed from cleaning of the MS4 and related structures.
2. The City must implement an O&M schedule for public streets, unpaved roads, paved roads, and paved highways within its jurisdiction to minimize pollutants that can be discharged in storm water.

The City's implementation strategy to comply with this Permit requirement is presented in Section 6.5.6.

6.5.6 MS4 Operation and Maintenance Activities Implementation

6.5.6.1 Overview

This program component is applicable to Coronado's MS4, which functions primarily to collect and convey surface runoff to receiving waters during storms in order to prevent flooding. This section describes the program requirements to comply with Permit Provision E.5.b.(1)(c)(ii). It is a common activity to maintain the storm drain system so that it functions hydraulically as intended during storms. The goal of this program is to reduce the impact of storm drain O&M activities on storm water quality.

Coronado's MS4 includes approximately 70 miles of gutters (curb and gutters and cross gutters), over 329 catch basins and inlets, 8.5 miles of storm drain pipeline, two pump stations and 15 wet/dry weather diversion stations with pumps or weirs/valves, and approximately 100 outfalls. Also, the City maintains six openings on the beach (sand may be moved away from outfalls to prevent flooding upstream and storm water ponding) during wet weather. MS4 facility types include: gutters, catch basins and inlets, inlet filters, pipelines, pump stations, and diversion structures

6.5.6.2 Wet/Dry Weather Diversion Structures

The City has installed 15 urban runoff diversion structures of various types at key locations throughout the City. These structures minimize pollutants reaching the receiving waters by effectively eliminating dry weather flows from these sites and diverting first flush and minor rain events to the sanitary sewer system.

6.5.6.3 MS4 Operation and Maintenance Activities Implementation

This section describes the various steps used to verify the implementation of designated minimum BMPs and compliance with the Permit.



Education and Staff Training

City of Coronado employees receive annual training on storm water regulations and JRMP program implementation strategies. Employees in the Public Services and Engineering Department also receive job-specific training to perform the tasks associated with the O&M practices for MS4 and Structural Controls such as the Diverter Structures. The City has in place SOPs for all its MS4 operation and cleaning activities and they are the basis for job-specific training implemented for this component. The City's SOPs are updated periodically and training is implemented immediately after revisions are completed. The City's SOPs (see Storm Water Standards Manual, Section 6-A) are strictly followed by employees assigned to the O&M of the MS4.

Inspection, Cleaning and Preventive Maintenance Practices

The City of Coronado has a comprehensive MS4 inspection, cleaning, and preventive maintenance program implemented using the MS4 SOPs described in the Storm Water Standards Manual in Section 6-B. Generally, all underground storm drain lines, catch basins and inlets are inspected and cleaned annually with emphasis on more frequent cleaning in the commercial sector of the City or other priority designated areas. The commercial sector catch basins identified as priority are generally inspected on a monthly basis and cleaned, as needed. More details can be found in the noted SOPs.

MS4 structures that are part of the program include catch basins, underground storm drain pipes, curb/gutter, swales, pump stations, diverter structures, and wet wells. These are inspected on the frequency and schedule shown by structure type.

6.5.6.4 Sanitary Sewer System Operation and Maintenance

The City of Coronado recognizes the importance of effective O&M of the sanitary sewer system as it relates to protection of the MS4 and receiving waters in support of:

1. The prevention and capture of sanitary sewer spills,
2. The dependence on its effective operation for use of the runoff diverters,
3. The prevention of infiltration of sanitary sewage into the MS4, and
4. The prevention and management of sanitary sewer leaks or other failures.

The City maintains the sanitary sewer system and is subjected to various WDRs and permits for its O&M. As noted earlier, the City's MS4 includes several urban runoff diversion structures that are connected to the sanitary sewer system.

The Public Services and Engineering Department is responsible for the O&M of both the sanitary sewer system and MS4. The O&M program for the MS4 is included in Section 6.5.6. The O&M program for the sanitary sewer includes a comprehensive inspection, cleaning, repair, and maintenance program. The City's Capital Improvement Project (CIP) program includes



funding for sanitary sewer replacement, improvements, and major repairs. The CIP program meets or exceeds industry standards and other regulatory requirements.

The City's sanitary sewer program includes preventive maintenance activities to reduce the risk of failure and leaks that could lead to the infiltration of sanitary sewage to the MS4 or release to the receiving waters (directly or indirectly). The City operates a closed-circuit television inspection program for underground MS4 pipes that can assist crews in identifying specific problem areas and sewer system leaks infiltrating the MS4.

6.5.7 Public Streets, Alleys and Roads Operation and Maintenance Requirements

Lastly, Permit Provision E.5.b.(1)(c)(iii) requires the following for Public Streets, Alleys and Roads O&M activities: the City must implement a schedule of O&M for public streets, unpaved roads, paved roads, and paved highways within its jurisdiction to minimize pollutants that can be discharged in storm water.

In addition, the City has defined jurisdictional strategies as part of the San Diego Bay WQIP relevant to this component as noted in Section 6.3.4.

6.5.8 Public Streets, Alleys and Roads Operation and Maintenance Implementation

Coronado has 49 miles of public streets, nine miles of alleys, and nine public parking lots or facilities [4th and Alameda, Boat House 1887 restaurant, Animal Control Facility, Public Boat Ramp, City Hall (two areas), Community Center and Municipal Pool, Little League, South Cays, and Glorietta Bay Park⁶. These facilities are reflected as part of the municipal inventory found in the Storm Water Standards Manual, Section 6-A. The City has a street sweeping program that is implemented for all public streets, public parking lots, and alleys. Coronado does not have any roads or highways and O&M of SR 75 and SR 282 are the responsibility of Caltrans.

6.5.8.1 Public Street and Alley Sweeping

Street sweeping is recognized as an effective method of reducing the amount of pollutants (litter, green waste, oils and grease, and sediment) on street surfaces that may impact storm water. The City has in place an established street sweeping program that is effective at removing these pollutants.

⁶ Public and private parking with The Landing.



The City's long-established street sweeping schedule is modified from time-to-time as needed. The City's current street sweeping schedule can be found on the City's website. Generally, the City sweeps high volume commercial areas daily and all other designated areas (high, moderate and low) on a weekly schedule. Alleys are swept a minimum of once monthly.

Street sweeper operators are advised to familiarize themselves with the equipment's maximum performance specifications as specified by the manufacturer, including optimal driving speed during sweeping. In areas of chronic hindrances due to parked cars, the City crew will either post temporary "No Parking" signs or manually clean those areas which are hard to reach. The sweeper operator will make note of problem areas and generate a work order for additional cleaning.

The street sweeper operator(s) notes any street and inlet problem areas and potential pollutant sources on their daily routes and reports those items as "work orders" so they can be resolved. These problems include spills, and illegal discharges or activities. The operator(s) report problems by using the work order process, unless there is an immediate issue; in which case, they can call Public Services' dispatch to initiate an investigation or inspection.

In addition to this effort, all public rights-of-way are thoroughly inspected for defects once a year. Streets Division or Storm Drain Division personnel conduct any follow-up inspections of the streets and parking lots (including gutters) when reported by the street sweeper operator(s).

6.5.8.2 Public Street and Parking Lot Repair Activities

Routine repair and maintenance activities for public streets and parking lots include: asphalt sealing, filling potholes, and minor construction for sidewalks, curbs and gutters. Minor construction, repair, and maintenance of City streets and parking lots follow the applicable minimum BMPs noted in the inventory (Storm Water Standards Manual, Section 6-A) and may also include, as applicable:

1. Repairing potholes to reduce sediment loss and erosion;
2. Ensuring that all materials are kept secured or collected once the job is completed; and
3. Increasing manual or street sweeping to ensure debris/dirt are removed at the end of each workday.

6.5.8.3 Parking Lot Management

The Public Services and Engineering Department is responsible for the management and maintenance of parking facilities, and for keeping all departments which utilize these facilities informed of storm water requirements. Activities in and around parking facilities may generate waste, spills, and leaks that could potentially reach the MS4 and receiving waters as storm water runoff or as non-storm water discharges. The minimum BMPs for the six high priority and three non-priority parking facilities are shown in the inventory (Storm Water Standards Manual,



Section 6-A). In addition to the minimum BMPs, the following measures also support controlling non-storm water discharges and pollutants:

Routine Facility Cleaning (Power Washing)

Whenever possible, the City will employ dry cleaning methods rather than power washing for cleaning activities involving buildings, windows, parking lots, sidewalks, and any other applicable outdoor surfaces. In cases where power washing is deemed necessary or appropriate, the City requires that all wash water resulting from power washing be captured prior to entering the MS4 and disposed of pursuant to applicable laws; this will serve as the minimum BMP for this activity. Water capture and conservation are primary requirements for this activity. Any contracted power washing services will conform to the contract specification.

Parking Restrictions and Good Housekeeping/Pollution Prevention

Parking restrictions are enforced throughout the City to minimize r extended parking or vehicle storage. This reduces the potential for spills, leaks, debris, and trash associated with overnight campers, parking, maintenance and repair, and vehicle storage. The following pollution prevention BMPs are also applicable to these facilities:

1. Prohibit vehicle washing in City parking lots;
2. Provide trash receptacles; and
3. Routinely sweep, pick up, shovel, and dispose of litter.

6.5.9 Special Events, Beaches and Parks

The City of Coronado has a written policy to encourage and regulate the use of City-owned parks and recreational facilities or rights-of-way by individuals and organizations for special community or personal events. The majority of the activities conducted by residents and other users are covered under an event permit and are included as part of the Special Events in Section 6.5.9.1.

The City has an Administrative Procedure and Policy for Special Event Permits that directs individuals and organizations wishing to hold an event in City-owned facilities or on public rights-of-way to obtain a Special Event Permit from the Office of the City Manager or Recreation Services. Upon completion and return of the Permit Application to the City, staff reviews and processes the application. No person or organization may conduct or stage a special event for more than 25 people in the City of Coronado without an authorized and paid Special Event Permit from the City.

This policy excludes events conducted at the Coronado Community Center, which are subject to the City of Coronado Recreation Services Facility Use Fees and Policies. The Recreation Services Department generally circulates the application to the Office of the City Manager,



Public Services and Engineering, Fire Services, and Police Services departments for their review and approval. It is also common for departments to meet and coordinate special events to outline all applicable requirements. If applicable, once approval is received from all departments, a contract is issued.

Two jurisdictional strategies were identified for municipal areas (Section 6.3.2) as part of the San Diego Bay WQIP – one for special events and one for beaches – in support of the goal of swimmable beaches. These have been incorporated into the management activities by the City as described below.

6.5.9.1 Special Events

The City's Special Event policy defines the various special events by size and potential impact on City services and facilities. The City has determined that only "Major Events" and "Moderate Events" have the potential to generate significant amounts of pollutants that may include trash, litter, and bacteria. Major Events and Moderate Events are subject to inspection as a municipal area and activity as described in Section 6.6.

The City's classification of special events is as follows, and subject to change by policy or amendment of administrative procedures:

1. Special Event: A Special Event is any scheduled or planned non-emergency event occurring within the City of Coronado which can reasonably be expected to require increased or modified emergency or non-emergency services, or support by the City government and/or personnel. In general, the community of Coronado and/or its institutions should derive some appropriate benefit in order for the City of Coronado to host or to support any such event. "Major Events," "Moderate Events," and "Minor Events," as defined in this policy, are all "Special Events."
2. Major Events: A Major Event is defined as an activity which entails *in excess of 2,000 participants and/or spectators* and which significantly affects City personnel, resources, services, facilities, and/or traffic circulation, or impacts the community and/or its citizens. The policy recommends there be no more than eight (8) Major Events in any calendar year. Examples of past Major Events include the following:
 - Flower Show/Book Sale/MotorCars on Main Street
 - Fourth of July activities
 - Summer concerts in Spreckels Park
 - Coronado Art Walk
 - Chamber of Commerce Holiday Open House



3. **Moderate Events:** A Moderate Event is defined as an activity which entails *up to 2,000 participants and/or spectators* and which significantly affects City personnel, resources, services, facilities, and/or traffic circulation, or impacts the community and/or its citizens.
4. **Minor Events:** A Minor Event is defined as any activity *for a small and/or specialized group that does not add special burden* on City personnel, resources, services, facilities, and/or traffic circulation, or impact the community and/or its citizens.

The City's designation of BMPs is tailored by the Public Service and Engineering Department and are included as special conditions in the Special Event Permit. Minimum or required BMPs are selected based on staff's BPJ. At minimum, trash management is a BMP implemented at all Special Events. Staff will pay close attention to event activities that include sources of bacteria to reduce and eliminate impacts on swimmable waters. The list of potential BMPs is provided in the Special Events SOP included in the Storm Water Standards Manual as Section 6-B.

6.5.9.2 *Beaches and Parks*

The City's parks, beaches, and recreational facilities have been identified in the inventory (Storm Water Standards Manual, Section 6-A) as either priority or non-priority area based on BPJ. Of these facilities, those that have restroom facilities and/or allow dogs are designated as priority and are subject to BMPs and inspections to identify conditions that may impact water quality, especially bacteria discharges to swimmable waters. Courtesy doggie bag dispensers are located in strategic areas and at all parks or areas where dogs are allowed.



Beaches are only a concern for bacterial sources under two conditions: 1) there are restroom facilities located on the beach; and/or 2) they are dog recreational areas. Only North Beach is designated as a dog use area in Coronado.

Beach trash and litter pickup is performed by foot patrol in the early morning hours and trash receptacles are emptied using an automated trash system. Parks are patrolled to monitor trash receptacle capacity and emptied as needed.

Parks have the potential for being areas and having activities associated with pesticides, herbicides, and fertilizers and managed in accordance with Section 6.5.2.4



6.5.10 Residential Development BMP Implementation and Maintenance Program Requirements

As illustrated in Figure 6-1, Permit Provision E.5.b.(2) requires that the City promote and encourage pollution prevention, BMP implementation, and pesticide, herbicide, and fertilizer BMPs. The same provision requires the O&M of the designated or applicable BMPs for residential areas and activities. See Section 6.5.1 for more all applicable requirements.

6.5.11 Residential Development BMP Implementation and Maintenance Program Implementation

For residential areas, the implementation of BMPs is linked to the City's Public Education and Outreach Program (JRMP Section 7). City staff evaluated all residential activities that have the potential to occur within the City of Coronado and determined that activities for which BMPs will be promoted and will be the focus of residential education are primarily:

- Erodible or disturbed soils
- Storage of materials and waste disposal
 - Disposal of trash
 - Disposal of pet waste
 - Disposal of green waste
 - Discharge of pool/spa water
- Home and garden care activities and product use
 - Pesticides, herbicides, and fertilizers; cleaners and chemicals
 - Home repair and remodeling (by homeowner)
 - Surface cleaning or power washing
- Disposal of household hazardous waste
- Vehicle, boat and equipment repair and maintenance, washing, and parking
- Condition of private property sewer laterals

6.5.11.1 Residential Pollution Prevention

Pollution prevention methods have been incorporated into the City's minimum set of BMPs. The City considers pollution prevention the first line of defense in the effort to minimize residential activity impacts to water quality. Pollution prevention practices and processes aim to reduce or eliminate the generation of pollutants in storm water runoff. For example, alternative products which are less toxic to aquatic organisms can be used in place of conventional cleaning and household products. Common products which have safer alternatives include: soaps, detergents, oil based cleaners, fertilizers, pesticides, paints, and solvents.

The City will promote the use of pollution prevention methods by residents through the implementation of educational outreach programs and enforcement of the minimum residential



BMPs. The City’s primary focus for residential areas and activities is the prevention and prohibition of non-storm water discharges. The City will encourage pollution prevention measures for a variety of residential activities and areas, if applicable, as follows:

Good Housekeeping

1. Non-storm Water Discharge Prohibitions and Prevention (JRMP Sections 3.3 through 3.5)
2. Spill Prevention, Control and Clean-up
 - a. Proper containment, cover
 - b. Storage, and disposal of solid/liquid/fluid spill
 - c. Effective recycling/reuse
3. Safe Alternative Product Purchase and Use

Storm Water Standards Manual

CASQA BMP for Pollution Prevention

- SC-10 Non-storm Water Discharges
- SC-11 Spill Prevention, Control and Clean-up
- SC-35 Safer Alternative Products
- SC-60 Housekeeping Practices

Although CASQA does not have a specific residential BMP handbook, the commercial version of the handbook can be generally applied with a few modifications. Alternatively, the City has developed BMP brochures and other information to promote and encourage BMPs for residential activities and areas. Additional information may be found in JRMP Section 7 – Public Education and Participation.

6.5.11.2 Residential BMP Implementation

The implementation of residential BMPs is promoted and encouraged by the City through education and outreach, and visual observations through neighborhood patrols conducted by the Public Services and Engineering Department. For any identified illicit discharges, additional inspection or education will be conducted to eliminate them. In addition, BMP requirements are included in CMC 61.08.040 and 61.08.050.

Storm Water Standards Manual

CASQA BMP for Residential

- BG-40 Landscape Maintenance

6.5.11.3 Operation and Maintenance of BMPs

Any BMP identified and required by the City for residential activities or areas will be subject to proper O&M, including repair, replacement, or substitution of ineffective BMPs. BMP inspection, maintenance, repair and upgrading is also supported by CMC 61.08.040.C.

6.5.11.4 Pesticide, Herbicide, and Fertilizer BMPs

Permit Provision E.5.b.(2)(d) states that the City must promote and encourage the implementation of BMPs to reduce pollutants in storm water discharges to the MEP and effectively prohibit non-storm water discharges associated with the application, storage, and disposal of pesticides, herbicides, and fertilizers from residential areas. In addition, the



discharge of pesticides, herbicides, and fertilizers to the MS4 is prohibited by CMC 61.08.050.B.1.

6.6 Existing Development Inspections

Permit Requirement:	Provision E.5.c
Title:	Existing Development Inspections
Brief Description:	The City must conduct inspections of inventoried existing development to ensure compliance with the applicable ordinance and permits, including the Municipal Permit.
Permit Page Number:	103 of 127

6.6.1 Existing Development Inspections Requirements

Permit Provision E.5.c describes the requirements for existing development (commercial, municipal and residential) inspections to verify compliance with the Permit, JRMP and City ordinances. The requirements are for the City to conduct inspections of inventoried existing development to ensure compliance with applicable local ordinances and permits, and the Permit.

6.6.1.1 Inspection Frequency Requirements (Permit Provision E.5.c.(1))

The City must establish appropriate inspection frequencies for inventoried existing development in accordance with the following requirements:

1. At a minimum, inventoried existing development must be inspected once every five years utilizing one or more of the following methods:
 - a. Drive-by inspections by City and contract staff;
 - b. Onsite inspections by City and contract staff; and/or
 - c. Visual inspections of publicly accessible inventoried facilities or areas by volunteer monitoring or patrol programs that have been trained by the City.
2. The frequency of inspections must be appropriate to confirm that BMPs are being implemented to reduce the discharge of pollutants in storm water from the MS4 to the MEP and effectively prohibit non-storm water discharges to the MS4;
3. The frequency of inspections must be based on the potential for a facility or area to discharge non-storm water and pollutants in storm water, and should reflect the priorities set forth in the San Diego Bay WQIP;



4. The City must annually perform onsite inspections of an equivalent of at least 20 percent of the commercial facilities and areas and municipal facilities in its inventoried existing development;⁷ and
5. Inventoried existing development must be inspected by the City or contract staff, as needed, in response to valid public complaints.

Based upon inspection findings, the City must implement all follow-up actions (i.e. education and outreach, re-inspection, enforcement) necessary to require and confirm compliance with its applicable local ordinances and permits and the requirements of the Permit, in accordance with its Enforcement Response Plan (ERP) found in Section 2-B of the City's Storm Water Standards Manual.

6.6.1.2 Inspection Content Requirements (Permit Provision E.5.c.(2))

The content of inspections conducted by City staff and/or contractors is prescribed by the Permit.

Inspections of existing development must include, at a minimum:

1. Visual inspections for the presence of actual non-storm water discharges;
2. Visual inspections for the presence of actual or potential discharge of pollutants;
3. Visual inspections for the presence of actual or potential illicit connections; and
4. Verification that the description of the facility or area in the inventory has not changed.

Onsite inspections of existing development by the City staff or contractors must include, at a minimum:

1. Assessment of compliance with its applicable local ordinances and permits related to non-storm water and storm water discharges and runoff;
2. Assessment of the implementation of the designated BMPs;
3. Verification of coverage under the Industrial General Permit, when applicable; and

⁷ If any commercial or municipal facilities or areas require multiple onsite inspections during any given year, those additional inspection may count toward the total annual inspection requirement. This requirement excludes linear municipal facilities (i.e., MS4 linear channels, sanitary sewer collection systems, streets, and roads).



4. If any problems or violations are found, inspectors must take and document appropriate actions in accordance with the ERP (Storm Water Standards Manual, Section 2-B).

6.6.1.3 Inspection Tracking and Records Requirements (Permit Provision E.5.c.(3))

The City must track all inspections and re-inspections at all inventoried existing development. The City must retain all inspection records in an electronic database or tabular format, which must be made available to the San Diego Water Board upon request. Inspection records must include, at a minimum:

1. Name and location of the facility or area (address and hydrologic subarea) consistent with the inventory name and location; and
2. Inspection and re-inspection date(s).

6.6.2 Existing Development Inspections Implementation

The City's existing development inspection program will be implemented as described in this section in compliance with the Permit.

6.6.2.1 Inspection Frequency Implementation

The City will inspect its inventoried existing development utilizing one or more of the following methods:

1. Drive-by (patrol) inspections by City and contract staff; and/or
2. Onsite inspections by City and contract staff.

Inspection frequencies are shown in Table 6-2 for each of the existing development categories. In general, commercial and municipal on-site inspections will be planned to take place annually and will be conducted by Public Services and Engineering Department staff or contractors. Municipal areas and activities may also be inspected by Public Services and Engineering Department supervisors as drive-by inspections for field operations to verify adherence to JRMP and SOP requirements. Residential areas will be planned and scheduled as drive-by inspections conducted by Public Services and Engineering Department staff or contractors by residential area on a quarterly basis. The three residential areas are defined in Section 6.4.2. If a need for an onsite inspection of a residential activity is identified during a drive-by inspection, the inspector may schedule with the resident or discharger, or initiate contact at the premises, if appropriate.



**Table 6-2
Existing Development Inspection Frequencies by Category**

Existing Development Category	Primary Inspection Method	Secondary Inspection Method	Frequency ⁸
Commercial	Onsite Inspections	Drive-by inspections	Annual
Industrial	Onsite Inspections	NA	Annual, if applicable
Municipal	Onsite Inspections	Drive-by inspections	Annual
Residential Areas	Drive-by (patrols) inspections	Onsite Inspections	Quarterly

In addition, inventoried existing development will be inspected by the Public Services and Engineering Department staff or its contractors, as needed, in response to valid public complaints, including illicit discharges. The City implementation of complaint investigation procedures is found in Section 3.7.

Municipal facilities (e.g., buildings, parks) will be inspected in a similar manner to commercial inspections to verify BMPs (Section 6.5.4) and meet the minimum inspection content (Section 6.6.2.2). MS4 facilities (e.g., storm drain inlets, outfalls) will be inspected to verify compliance with the BMPs and SOPs in Section 6.5.6 and other general infrastructure such as streets and alleys will be inspected for BMP compliance as described in Section 6.5.8).

In addition, the City’s Public Services and Engineering Department will be conducting inspections of all Major and Moderate Events to verify implementation and compliance with the BMPs selected for the event, as shown on the completed form for that event (see Section 6.5.9). Inspections and any immediate corrective actions will be determined during the event. The post-event inspection will also serve to identify any improvements needed in the application process, BMP selection for the type of event, and/or any additional BMPs for future events. The post-event inspection will provide the feedback mechanism to improve the program, as needed.

6.6.2.2 Inspection Content Implementation

Inspection content (Section 6.6.1.2) is satisfied by using a standardized inspection form (see Storm Water Standards Manual, Section 3-A). The comprehensive Storm Water General Inspection Form addresses all the inspection content requirements in the Permit.

⁸ The Permit specifies a minimum frequency of once every five years (see Section 6.6.1.1), but it also requires the application of other criteria to adjust it. These frequencies account for the City’s evaluation of the Permit requirements.



6.6.2.3 Inspection Tracking and Records Implementation

The City will utilize the inventory for existing development to plan and complete the inspections as noted in this JRMP section. The City utilizes a combination of Excel based spreadsheets and the TRACKiT permitting database to monitor implementation of inspections and execute records management tasks.

6.7 Existing Development Enforcement

Permit Requirement:	Provision E.5.e
Title:	Existing Development Enforcement
Brief Description:	The City must enforce its legal authority for all its inventoried existing development to achieve compliance with the requirements of the Permit.
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Per Permit Provision E.5.e, the City must enforce its legal authority established pursuant to Permit Provision E.1 (see JRMP Section 2) for all its inventoried existing development, as necessary, to achieve compliance with the requirements of the Permit, in accordance with its ERP.

The City has established its legal authority to enforce standards and requirements applicable to all development projects through the City’s municipal code and the development of standards and guidelines as part of the Storm Water Standards Manual, Section 2.

The City has developed and implements an ERP as part of this JRMP and it is found, along with the legal authority documentation, in Section 2 of this JRMP.

6.8 Annual Reporting

A comprehensive annual reporting plan to meet the requirements in the Permit is included in Section 9 of this JRMP.

The minimum annual reporting requirements listed in the Permit are found in Permit Appendix D-3, the Jurisdictional Runoff Management Program Annual Report Form (Annual Report Form) found in Section 8-A of the Storm Water Standards Manual. The Annual Report Form includes the following items related to the Existing Development Management Program component.

Answers (yes or no) to the following question:

Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001?



For all four existing development categories (municipal, commercial, industrial and residential) the following data:

1. Number of facilities or areas in inventory,
2. Number of existing development inspections,
3. Number of follow-up inspections,
4. Number of violations,
5. Number of enforcement actions issued, and
6. Number of escalated enforcement actions issued.

The Permit is not clear on the definition nor does it provide an explanation of the field or entries to be submitted in the Annual Report Form. To assist City staff in consistently reporting data from year-to-year, the definitions or clarifications provided in Table 6-3 were developed as part of the JRMP preparation process⁹.

**Table 6-3
Annual Report Form Definitions for Existing Development**

Reporting Item	Definition or Clarification
Number of facilities or areas in inventory	Updated inventory for the year including verification from business licenses and inspections. Separate list for mobile businesses. Residential is defined by two area: The Village and The Coronado Cays.
Number of existing development inspections	Municipal inspections: All priority city facilities (e.g. City Hall, Comm. Center, golf course, etc.). Also parks with restroom facilities, sewer, and storm drain stations. Includes Hotel Del monthly inspections, as applicable. Commercial inspections are included. Residential defined by “patrols” and logged as number of hours of patrol per year. Recorded residential inspections included.
Number of follow-up inspections	All inspections performed to verify a compliance condition, requirement or BMP
Number of violations	Notice of Violation (NOV) or higher violation issued
Number of enforcement actions issued	Enforcement action NOV or higher
Number of escalated enforcement actions issued	Any enforcement action issued for the same type of violation taken to the next level (e.g., Warning-> NOV or NOV -> stop work order/CDO, etc.)

⁹ Note: these definitions were applied with the Annual Report form starting with FY 2013-14.



In order to meet the reporting requirements, the City has established a variety of computer-aided tools or programs that facilitate data tracking and management.

Essential data tracking, management and reporting tools for the Existing Development component of the JRMP are:

1. The continued support and use of the TRACKiT system and Business License software;
2. Storm Water Permits in TRACKiT and Maintenance of the Existing Development inventory reporting capabilities;
3. Maintenance of completed inspection forms in TRACKiT; and
4. Documentation of all enforcement actions issued in TRACKiT.



7.1 Public Education & Participation Requirements

Permit Requirement:	Provision E.7
Title:	Public Education and Participation
Brief Description:	The City must implement a public education and participation program that takes into account the strategies presented in the San Diego Bay WQIP.
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Permit Provision E.7 requires that the City implement, individually or with other Copermittees, a public education and participation program in accordance with the strategies identified in the San Diego Bay Water Quality Improvement Plan (WQIP) to promote and encourage the development of programs, management practices, and behaviors that reduce the discharge of pollutants in storm water to the Maximum Extent Practicable (MEP), prevent controllable non-storm water discharges from entering the Municipal Separate Storm Sewer Systems (MS4), and protect water quality standards in receiving waters. The public education and participation program must be implemented in accordance with the strategies in the San Diego Bay WQIP as noted below.

7.1.1 Public Education Requirements

Per Permit Provision E.7.a., the following is required for the public education program.

- a. The public education program component implemented within the City must include, at a minimum, the following:
 1. Educational activities, public information activities, and other appropriate outreach activities intended to reduce pollutants associated with the application of pesticides, herbicides and fertilizer and other pollutants of concern in storm water discharges to and from its MS4 to the MEP, as determined and prioritized by the Copermittee(s) by jurisdiction and/or watershed to address the highest priority water quality conditions identified in the San Diego Bay WQIP;
 2. Educational activities, public information activities, and other appropriate outreach activities to facilitate the proper management and disposal of used oil and toxic materials; and
 3. Appropriate education and training measures for specific target audiences, such as construction site operators, residents, underserved target audiences and school-aged children, as determined and prioritized by the Copermittee(s) by jurisdiction and/or watershed, based on high risk behaviors and pollutants of concern.



7.1.2 Public Participation Requirements

Per Permit Provision E.7.b., the following is required for the public participation program.

- b. The public participation program component implemented within the City must include, at a minimum, the following:
 1. A process for members of the public to participate in updating the highest priority water quality conditions, numeric goals, and water quality improvement strategies in the San Diego Bay WQIP;
 2. Opportunities for members of the public to participate in providing the City recommendations for improving the effectiveness of the water quality improvement strategies implemented within its jurisdiction; and
 3. Opportunities for members of the public to participate in programs and/or activities that can result in the prevention or elimination of non-storm water discharges to the MS4, reduction of pollutants in storm water discharges from the MS4, and/or protection of the quality of receiving waters.

7.2 Jurisdictional Strategies – San Diego Bay WQIP

The San Diego Bay WQIP includes the following ten jurisdictional strategies for Public Education and Participation to be implemented over the course of the permit term in the City of Coronado.

1. Implement a public education and participation program to promote and encourage development of programs, management practices, and behaviors that reduce the discharge of pollutants in storm water prioritized by high-risk behaviors, pollutants of concern, and target audiences.
2. Develop an outreach and training program for property managers responsible for Home Owners Associations.
3. Support trash cleanups through community-based organizations involving target audiences.
4. Improve consistency and content of websites to highlight enforceable conditions and reporting methods.
5. Target education towards activities and human behavior (e.g. signage) in parks and other public areas including trash reduction or other high impact behavior to habitat, wildlife, and water quality.
6. Engage with the Main Street Association to promote activities and good housekeeping practices.



7. Collaborate with regional, watershed education and outreach efforts.
8. Develop and/or distribute existing materials (from other sources) for education and outreach to reduce over-irrigation.
9. Municipal staff training targeted to select groups based on job duties and activities with emphasis on Focused Priority Conditions (swimmable waters – bacteria).
10. Tailor education and outreach based on results of surveys.
11. Provide technical education and outreach to the development community on the design and implementation requirements with an emphasis on Focused Priority Conditions (swimmable waters – bacteria).

The City's public education and participation activities will include and focus on finding opportunities to facilitate, promote and directly implement the above and other strategies in support of the compliance with the Permit, San Diego Bay WQIP and JRMP.

7.3 Public Education Implementation

The City's implementation strategy for public education will center on leveraging available resources with watershed Copermittees, regionally (e.g, Think Blue), and with other organizations to address the pollutants and sources or activities that may lead or cause discharges to the MS4 and/or receiving waters. The following order has been prepared to determine implementation strategies: 1) Priorities listed in the Permit, 2) Priorities listed in the San Diego Bay WQIP, and 3) other emerging priorities as determined by the City or watershed Copermittees.

The City's Public Education and associated outreach efforts are anticipated to be dynamic and adaptive to the needs identified during the Permit term and in response to findings of effectiveness from previous efforts and the implementation of current JRMP activities (e.g., inspections, one-on-one communications, public complaints).

A summary of the City's general implementation strategy listing the pollutant type/group or concern, reason for targeting it, and the target audiences are provided in Table 7.1.



**Table 7-1
Public Education and Outreach Implementation**

Pollutant Type/ Group or Concern	Reason	Target Audience(s)
Non-storm water discharges	General permit requirement and prohibitions (Ordinance), includes priorities such as: over-irrigation, illicit discharges	General public, residents, business, construction contractors, municipal operations and employees
Pesticides, herbicides and fertilizers	Permit Provision E.7.a.1 – minimum educational requirement	Landscapers – municipal, commercial and residential
Oil and toxic materials	Permit Provision E.7.a.2 – minimum educational requirement	Residents (household hazardous waste program) and businesses
Bacteria	Swimmable waters, focused priority water quality condition in San Diego Bay WQIP	Pet owners, residents, restaurants, municipal operations (sanitary sewer and storm drains)
Trash	General permit requirement. Statewide trash policy. City goal and street sweeping program.	Residents and businesses

Public education strategies will include participation with other Copermittees in watershed and regional efforts to maximize messaging and effectiveness, and to leverage resources. Examples of educational media to be implemented throughout the Permit term are included for by target audience in Table 7.2.

As the City develops specific public education materials, either independently or jointly with other parties or Copermittees, they will be posted on the City’s website, available at key public contact points (e.g, City Hall and Public Services counters), and included in the City’s Storm Water Standards Manual, Section 7.



**Table 7-2
Public Education Media and Outreach by Target Audience**

Target Audience	Public Education Media and Outreach	Participation Level
General public	Mass media (television, movie theaters, billboards, local publications). Public/community event booths	Regional, watershed and local
Residents	Local publications, City announcements, mailings One-on-one (inspections, complaint investigations)	Local
Commercial business	Local publications, City announcements, mailings, business licenses, workshops/training One-on-one (inspections, complaint investigations)	Local
Development community and construction contractors	Local and trade publications, City announcements, website updates, mailings, business licenses, workshops/training One-on-one (meetings, inspections, complaint investigations) Building Counter support and services	Local, watershed, regional
Landscape contractors	Local and trade publications, City announcements, mailings, business licenses, workshops/training One-on-one (inspections, complaint investigations)	Local, watershed, regional
Municipal employees and contractors	Newsletters and training One-on-one with supervisors Contractors – contract language	

7.4 Public Participation Implementation

The City proactively promotes the public’s participation in the development and implementation of both the San Diego Bay WQIP and the jurisdictional program components.

The City was an engaged participant and promoted public participation in the development of the San Diego Bay WQIP’s strategies, numeric goals, water quality priorities, etc. as required and to comply with Permit Provisions E.7.b.1 and E.7.b.2.

The City’s storm water hotline and website action center page (see JRMP Section 3.7.2.3 – Public Reporting) offer the public an opportunity to engage with the City to prevent and eliminate non-storm water or illicit discharges to the MS4 and receiving waters. This is one of public participation opportunities offered by the City to residents, businesses, and others to be directly involved with the program. Others include: public beach clean-up event held in the City, household hazardous waste and other recycling or disposal events, City department staffed booths at public or community events. The City’s commitment to this public participation efforts comply with Permit Provision E.7.b.3.



7.5 Annual Reporting

A comprehensive annual reporting plan to meet the requirements in the Permit is included in Section 9 of this JRMP.

The Permit requires minimum annual reporting requirements found in Permit Appendix D-3, the Jurisdictional Runoff Management Program Annual Report Form (Annual Report Form) found in Storm Water Standards Manual, Section 8-A. The Annual Report Form includes the following items for each of the JRMP components listed for Public Education and Participation:

Answers (yes or no) to the following questions:

1. Has the City implemented a public education program component that complies with Order No. R9-2013-0001?
2. Has the City implemented a public participation program component that complies with Order No. R9-2013-0001?



8.1 Fiscal Analysis Requirements

Permit Requirement:	Provision E.8
Title:	Fiscal Analysis
Brief Description:	The City must review and report on various fiscal analysis items described in the Permit to demonstrate expenditures and staffing for the current and next fiscal year as part of the San Diego Bay WQIP Annual Report (that will include the City's JRMP Annual Report).
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Permit Provision E.8 lists the minimum requirements to comply with the Fiscal Analysis component of the JRMP as follows:

- a. The City must secure the resources necessary to meet all the requirements of the Permit.
- b. The City must conduct an annual fiscal analysis of its jurisdictional runoff management program in its entirety. The fiscal analysis must include the following:
 1. Identification of the various categories of expenditures necessary to implement the requirements of the Permit, including a description of the specific capital, operation and maintenance (O&M), and other expenditure items to be accounted for in each category of expenditures;
 2. The staff resources needed and allocated to meet the requirements of the Permit, including any development, implementation, and enforcement activities required;
 3. The estimated expenditures for the two Provision above for the current fiscal year; and
 4. The source(s) of funds that are proposed to meet the necessary expenditures described in the two first Provisions, including legal restrictions on the use of such funds, for the current fiscal year and next fiscal year.
- c. The City must submit a summary of the annual fiscal analysis with each San Diego Bay Water Quality Improvement Plan (WQIP) Annual Report required by the Permit.
- d. The City must provide the documentation used to develop the summary of the annual fiscal analysis upon request by the San Diego Water Board.



8.2 Jurisdictional Strategies – San Diego Bay WQIP

The San Diego Bay WQIP does not include any jurisdictional strategies for Fiscal Analysis that are directly linked to focused priority water quality conditions (swimmable waters).

8.3 Fiscal Analysis Implementation

8.3.1 City Budget Process Overview

The City of Coronado determines its annual operating budget by evaluating the proposed expenditures for the various components of the entire storm water program (jurisdictional, watershed, and regional) and also evaluating the funds from the designated sources.

The City's budget is based on a one-year cycle with an opportunity for revisions at mid-year. If, at that time, it is determined that existing resources are not adequate to meet the requirements of the Permit, additional resources may be loaned, added or transferred to the storm water program budget as approved by City Council.

Storm water program activities are distributed or allocated among several City programs and funds are accounted for separately and in each program budget. For example, infrastructure capital improvement project budgets are separate from routine O&M budgets for infrastructure. Within O&M budgets there may be various sub-accounts.

The following section addresses the City's approach to complying with the on-going, annual fiscal analysis requirements.

8.3.1.1 City Department Budgets

The City has numerous departments within its organization that implement the requirements of the Permit (see Section 1 and Figure 1-9). As a part of the budgeting process, each department head is required to submit a draft budget to the City Manager to include in a comprehensive budget for City Council review and approval. The Departments involved in the JRMP's implementation include, but are not limited to, City Manager's office, City Attorney, Community Development, Public Services and Engineering, Fire, and Administration.

The majority of the storm water program budget is managed by the Public Services and Engineering Department and the funds are allocated to the Storm Drain and Storm Drain NPDES operation budgets. These two accounts, along with the Storm Drain specific Capital Improvement Projects are funded by Storm Drain User Fee Enterprise account. The Storm Drain Enterprise account does not generate sufficient revenues to cover its expenses and is unsustainable to support storm water compliance. It is more than 60% reliant upon loans from the City's General Fund to maintain operations. Cross-over tasks, such as Food Establishment Waste Discharge (FEWD) inspections, and shared equipment is also partially supported by the Wastewater Enterprise account.



Under California's Proposition 218, there is no realistic means to generate additional revenues to close this enormous funding gap. As such, the Storm Drain Enterprise account is unable to repay the General fund loans and is in perpetual deficit. As NPDES Permit requirements, and administrative efforts to support, continue to ratchet upward, the gap between Storm Drain Enterprise Fund revenues and expenses will continue to widen. The proposed AB 1362, currently under consideration in the CA State Legislature, may provide some relief for jurisdictions to address deficit accounts, but the timeline to actionable efforts, should this measure and its subsequent change to the CA State Constitution pass, are several years away.

The following section describes the City's current or updated approach to conducting and reporting on the fiscal analysis as part of the JRMP Annual Report.

8.3.2 Fiscal Analysis Annual Review Methodology

The City's methodology to evaluate the fiscal analysis requirements in the Permit includes completion of the following:

1. The JRMP Annual Report Form (from Permit Appendix D-4)¹
2. The Coronado Fiscal Analysis Annual Review Form¹

Coronado developed the Fiscal Analysis Annual Review Form to facilitate the completion of the fiscal analysis and annual reporting requirements (also see Section 8.4).

8.3.2.1 Resources

To respond to the question of necessary resources to meet the requirements of Permit Provision E.8.a, it is first necessary to review the responses to the annual report questions in the JRMP Annual Report Form completed after the end of the reporting period (July 1 – June 30). If any of the responses in the JRMP Annual Report Form indicate that the City has not been able to comply with a Permit required component or requirement, it should then review and document the reasons for the shortcoming. This review constitutes the most important element of the annual fiscal analysis. The review should attempt to identify if the issue(s) that may have led to the Permit requirement not being completed. For example, were staffing resources an issue - a vacancy was not filled for several months until recruitment was completed. The response should also follow with a short explanation regarding the steps taken or to be taken to remedy the condition. In the same example, the explanation would indicate that

Resources - Permit Provision E.8.a

Staff will review program performance and effectiveness by reviewing the annual reporting data to determine if resources are adequate to implement the Permit requirements.

¹ See Storm Water Standards Manual, Section 8-A



a new employee was hired on January 8th and has completed initial training to perform the duties assigned for the storm water program.

Responses and explanations to resource adequacy during the reporting year are noted in the Coronado Fiscal Analysis Annual Review Form, Part A.

8.3.2.2 Expenditures by Category

The City has identified the following expenditure categories relevant to the implementation of the City's storm water program:

- Personnel Services
 - Salaries, wages
 - Benefits and allowances
- Services and Supplies
 - This category may include these and other sub-categories depending on the fund*
 - Contract Services
 - Consulting and professional services support
 - Regional and watershed program (San Diego Bay WQIP) cost-sharing contributions
 - Utilities
 - Repair and Maintenance
 - Fuels and lubricants
 - Supplies, materials, small tools, instrumentation
 - Training, memberships
- Property
 - Office and computer equipment
 - Other fixed assets
 - Shop tools
 - Vehicle and equipment
- Contingency
- Debt repayment (bonds)
- Other(s)

Expenditure Categories - Permit Provision E.8.b.(1)

Staff will identify the expenditure categories to meet Permit requirements in various department budgets and report them as required.

Any significant changes to the expenditure categories listed above that may affect compliance with the Permit are reported in the Coronado Fiscal Analysis Annual Review Form, Part B.

8.3.2.3 Staffing Resources

The City will evaluate the staffing resources needed and allocated to meet the requirements of the Permit by

Staffing Resources - Permit Provision E.8.b.(2)

Staff will identify the staffing resources needed to meet Permit requirements.



reviewing any shortcomings, non-compliance, or deficiencies and identifying if staff resources are at the core of the issue. The JRMP Annual Report Form is used to identify staff resources. Initial questions that may be asked include: 1) Are staffing levels adequate?; 2) Are tasks or activities assigned to the correct personnel with adequate training?; 3) What are the potential actions or solutions to any identified staffing deficiency or shortcoming(s)?

Any significant changes to staffing resources that may affect compliance with the Permit are reported in the Coronado Fiscal Analysis Annual Review Form, Part C.

8.3.2.4 Expenditure by Category and Staffing Resources

The City will report and document the expenditures and staffing resources for the fiscal year, as part of the attachment to the Annual Report Form using the Coronado Fiscal Analysis Annual Report Review Form (Part D), for the categories listed in Section 8.3.2.2, as applicable.

Reporting Expenditures by Category and Staffing Resources - Permit Provision E.8.b.(3)

Staff will report the expenditures and staffing resources for the fiscal year.

Expenditures are prepared using two different methods: 1) percent of budget; and 2) actual.

Percent of budget is used to estimate expenditures that are a portion of a budget item that may include multiple sub-items. For example, the Fire department will use a portion of its training budget corresponding to storm water expenses and the remaining expenses may be for certifications not relevant to storm water. Most of the percent expenses for these departments are personnel related.

Public Services expenditures can be provided using the actual expenditure report from the City's financial system. The expenses incurred by Public Services for Permit compliance are mainly in the Storm Drain and Storm Drain NPDES budget/fund, but the department also has significant expenses/budget in both Waste Water Operations and Streets.

8.3.2.5 Funding Sources

The City will report and document the funding sources for both the expenditure and staffing resources list in Section 8.3.2.2 for the reporting fiscal year and the next fiscal year, including a tally of any legal restrictions on the use of the funds, as applicable. Any significant changes to the resources that may affect compliance with the Permit are reported in the Coronado Fiscal Analysis Annual Review Form, Part C.

Funding Sources - Permit Provision E.8.b.(4)

Staff report the funding sources and any legal restrictions on the funds use.

The funding sources for the implementation of the storm water program in the City of Coronado are summarized in Table 8-1. Currently the Storm Drain Enterprise account supports the Storm



Drain and NPDES fund accounts and is paid for by a Storm Drain User Fee and supplemented by the General Fund. Percentage of funding is not shown as it may change each fiscal year.

**Table 8-1
Funding Sources Summary**

Fund or Funding Source	Legal Restrictions
Storm Drain Enterprise Storm Drains Storm Drain NPDES Capital Improvement Projects	
General Fund Storm Drain Storm Drain NPDES City Manager Administration Fire Public Services and Engineering Accounts Community Development	None.
Wastewater Enterprise Fund Wastewater Operations and Maintenance Capital Improvement Projects	Must be used for wastewater operations/maintenance and storm water compliance.

8.4 Annual Reporting

A comprehensive annual reporting plan to meet the requirements in the Permit is included in Section 9 of this JRMP.

The Permit requires minimum annual reporting requirements found in Permit Appendix D-3, the Jurisdictional Runoff Management Program Annual Report Form (Annual Report Form). The Annual Report Form includes the following items for each of the JRMP components listed for Fiscal Analysis:

Answers (yes or no) to the following question:

1. Has the City attached to the Annual Report Form a summary of its fiscal analysis that complies with Order No. R9-2013-0001?

The City will attach to the JRMP Annual Report Form to the San Diego Bay WQIP Annual Report with a summary of the fiscal analysis as described in Section 8.3.2. In addition, Coronado will include the Fiscal Analysis Annual Review Form to facilitate the completion of the fiscal analysis and annual reporting requirements.



9.1 Program Management and Reporting Overview

The Permit has several requirements associated with Program Management and Reporting that are summarized in this section. These various program management elements of the JRMP are also part of the San Diego Bay Water Quality Improvement Plan (WQIP). The San Diego Bay WQIP annual report will include the City of Coronado's JRMP annual report. The key Permit requirements and components of program management are:

1. Assessment Requirements (Permit Provision D.4.a and D.4.b)
2. Special Studies and Studies Assessments (Permit Provision D.3 and D.4.c)
3. Integrated Assessment of Water Quality Improvement Plans (Permit Provision D.4.d)
4. Water Quality Improvement Monitoring and Assessment Program (Permit Provision B.4)
5. Iterative Approach and Adaptive Management Process (Permit Provision B.5)
6. Water Quality Improvement Plan Submittal, Updates, and Implementation (Permit Provision B.6)
7. Reporting (Permit Provision F)

As noted in the above list, the requirements are found in numerous provision of the Permit, for example, Permit provision B relates to WQIPs while Permit Provision D relates to the Monitoring and Assessment Program where the requirements for numerous monitoring programs are listed. This JRMP section has been prepared to provide a guide to the City's implementation of the various elements. It should be noted that these numerous requirements are mainly satisfied as part of the San Diego Bay WQIP and that the JRMP is considered a part of the overall watershed plan and implementation strategy (see JRMP Section 1.3, Purpose and Objectives).

The City's organizational structure with roles and responsibilities for JRMP implementation are provided in Sections 1.4 and 1.5.

9.2 Jurisdictional Strategies – San Diego Bay WQIP

The San Diego Bay WQIP does not include any jurisdictional strategies for Program Management and Reporting that are directly linked to focused priority water quality conditions.

9.3 Program Management Implementation

Program management implementation activities include participation, collaboration and funding of the JRMP, San Diego Bay WQIP, and regional programs (e.g., Regional Clearinghouse) as appropriate (see Fiscal Analysis; Section 8).

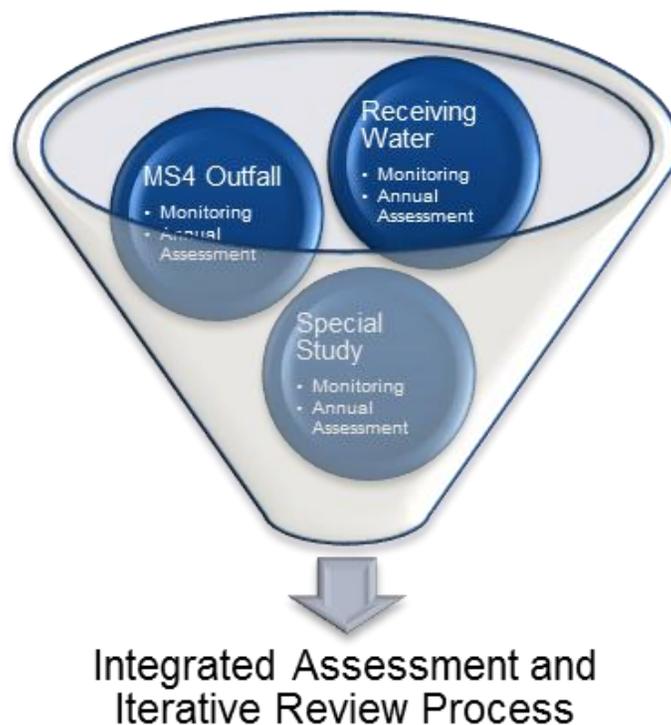


9.3.1 Monitoring and Assessment

Section 5 of the San Diego Bay WQIP describes the Monitoring and Assessment requirements from Permit Provision D and the implementation plan developed by the San Diego Bay WQIP responsible parties (including the corresponding watershed Copermitees and the City of Coronado). An overview of the monitoring program requirements is presented in JRMP Section 3.11, Table 3-8, and Figure 3-4.

Monitoring and assessment is performed jointly with responsible parties or Copermitees or independently by the City, as appropriate. The end result is a comprehensive and integrated assessment described in detail in the San Diego WQIP Monitoring and Assessment Program (MAP) that includes the data and information collected from the implementation of the JRMP along with monitoring program data (e.g., Municipal Separate Storm Sewer Systems (MS4) outfall, receiving water, special studies) to support program modifications for both the San Diego Bay WQIP and the City's JRMP in an iterative process as shown in Figure 9-1.

**Figure 9-1
Comprehensive Monitoring Illustration**



9.3.2 Iterative Approach and Adaptive Management Process

The iterative process is described in detail in Section 6 of the San Diego Bay WQIP. In summary, it involves the re-evaluation of the priority water quality conditions for San Diego Bay watersheds and the associated goals and strategies with their corresponding schedules. From



Section 6 of the San Diego Bay WQIP, Figure 9-2 illustrates the relationship between the program planning (San Diego Bay WQIP and JRMP), implementation of the programs, and assessment that all together make-up the iterative process that informs the adaptive management of both the San Diego Bay WQIP and JRMP.

Figure 9-2
Iterative Process to Inform Adaptive Management



9.4 Program Updates and Annual Reporting Requirements

Permit Provision F – Reporting includes requirements for WQIP development, submittal, implementation, and updates; updates to the JRMP, Best Management Practice (BMP) Design Manual, WQIP; progress (or annual) reporting; the Regional Clearinghouse; and submittal of the Report of Waste Discharge.

9.4.1 JRMP Document Update

The Permit requires that the City consider a JRMP document update as described in Permit Provisions F.2.a.(1)-(5):

1. The City is encouraged to seek public and key stakeholder participation and comments, as early and often as possible during the process of developing updates to its JRMP document;



2. The City must update its JRMP document concurrent with the submittal of the San Diego Bay WQIP. The City must correct any deficiencies in the JRMP document based on comments received from the San Diego Water Board in the updates submitted with the San Diego Bay WQIP Annual Report;
3. The City must submit updates to its JRMP, with the supporting rationale for the modifications, either in the San Diego WQIP Annual Report Water Quality Improvement Plan Annual Report [per Permit Provision F.3.b.(3)] or as part of the Report of Waste Discharge (Permit Provision F.5.b);
4. The City must revise proposed modifications to its JRMP as directed by the San Diego Water Board Executive Officer; and
5. Updated JRMP documents must be made available on the Regional Clearinghouse required (Permit Provision F.4) within 30 days of submitting the San Diego Bay WQIP Annual Report.

9.4.2 San Diego Bay WQIP Update

Upon completion of the five year cycle, the City along with the corresponding responsible parties and Copermittees for the San Diego Bay Watershed will complete a program update anticipated to be part of the Report of Waste Discharge required for reissuance of the Permit. The submittal serves to inform the San Diego Water Board of the status of the entire municipal storm water program and any permit modifications or requirements.

The San Diego Bay WQIP and this JRMP, submitted to the San Diego Water Board in June 2015, is subject to annual or progress reporting requirements per Permit Provision F.3.b.(3) as follows:

The Copermittees for each Watershed Management Area (WMA) must submit a WQIP Annual Report for each reporting period no later than January 31 of the following year. The annual reporting period consists of two different periods: 1) July 1 to June 30 of the following year for the jurisdictional runoff management programs, 2) October 1 to September 30 of the following year for the monitoring and assessment programs. The WQIP Annual Reports must be made available on the Regional Clearinghouse. Each Annual Report must include the following [Permit Provisions F.3.b.(3)(a)-(f)]:

- a. The receiving water and MS4 outfall discharge monitoring data collected (Permit Provisions D.1 and D.2), summarized and presented in tabular and graphical form;
- b. The progress of the special studies required (Permit Provision D.3), and the findings, interpretations and conclusions of a special study, or each phase of a special study, upon its completion;
- c. The findings, interpretations and conclusions from the assessments (Permit Provision D.4);



- d. The progress of implementing the San Diego Bay WQIP, including, but not limited to, the following:
 - i. The progress toward achieving the interim and final numeric goals for the highest water quality priorities for the Watershed Management Area;
 - ii. The water quality improvement strategies that were implemented and/or no longer implemented by each of the Copermittees (including the City of Coronado) during the reporting period and previous reporting periods;
 - iii. The water quality improvement strategies planned for implementation during the next reporting period;
 - iv. Proposed modifications to the water quality improvement strategies, the public comments received and the supporting rationale for the proposed modifications;
 - v. Previous modifications or updates incorporated into the San Diego Bay WQIP and/or the City's JRMP document and implemented by the Copermittees in the Watershed Management Area; and
 - vi. Proposed modifications or updates to the San Diego Bay WQIP and/or the City's JRMP.
- e. A completed Jurisdictional Runoff Management Program Annual Report Form (Permit Attachment D, or JRMP Appendix 8-A, or a revised form accepted by the San Diego Water Board) for each Copermittee in the San Diego Bay Watershed Management Area, certified by a Principal Executive Officer, Ranking Elected Official, or Duly Authorized Representative; and
- f. Each Copermittee, including the City of Coronado, must provide any data or documentation utilized in developing the San Diego Bay WQIP Annual Report upon request by the San Diego Water Board. Any Copermittee monitoring data utilized in developing the San Diego Bay WQIP Annual Report must be uploaded to the California Environmental Data Exchange Network (CEDEN). Any Copermittee monitoring and assessment data utilized in developing the San Diego Bay WQIP Annual Report must be available for access on the Regional Clearinghouse.

9.5 Annual Reporting Implementation

The Permit requires minimum annual reporting requirements found in Permit Appendix D-3, the Jurisdictional Runoff Management Program Annual Report Form (Annual Report Form). The Annual Report Form is provided as part of the Fiscal Analysis section of the JRMP as Appendix



8-A. Each section of the City's JRMP includes the specific reporting requirements from the Permit and recommended recordkeeping. Reporting within each JRMP section is typically found at the end of the corresponding section. The summary below is taken from each JRMP section here to provide for one location that lists all the required items to complete the Annual Report Form.

The Annual Report Form includes the following items from the JRMP:

1. Legal Authority
2. JRMP Document Update
3. Illicit Discharge Detection and Elimination Program
4. Development Planning Program
5. Construction Management Program
6. Existing Development
7. Public Education and Participation
8. Fiscal Analysis

The Annual Report Form lists the following questions (to be answered either yes or no)

Legal Authority

1. Has the City established adequate legal authority within its jurisdiction to control pollutant discharges into and from the MS4 that complies with Order No. R9-2013-0001?
2. A Principal Executive Officer, Ranking Elected Official, or Duly Authorized Representative has certified that the City obtained and maintains adequate legal authority?

JRMP Document Update

1. Was an update of the JRMP document required or recommended by the San Diego Water Board?

If yes, to the question above, did the City update its JRMP document and make it available on the Regional Clearinghouse?

Illicit Discharge Detection and Elimination (IDDE)

1. Has the Copermittee implemented a program to actively detect and eliminate illicit discharges and connections to its MS4 that complies with Order No. R9-2013-0001?

Reporting of the following data or statistics:

- a. Number of non-storm water discharges reported by the public
- b. Number of non-storm water discharges detected by City staff or contractors



- c. Number of non-storm water discharges investigated by the City
- d. Number of sources of non-storm water discharges identified
- e. Number of non-storm water discharges eliminated
- f. Number of sources of illicit discharges or connections identified
- g. Number of illicit discharges or connections eliminated
- h. Number of enforcement actions issued
- i. Number of escalated enforcement actions issued

The Permit prescribes numerous and extensive measures that must be included in the IDDE Program to investigate and eliminate illicit discharges to the MS4. One measure listed in Permit Provisions E.2.d.4. requires the City submit a summary of the non-storm water discharges and illicit discharges and connections investigated and eliminated as part of the San Diego Bay WQIP Annual Report. The data reported above, in the JRMP Annual Report, will also be included in the San Diego Bay WQIP Annual Report to satisfy the requirement.

The Permit is not clear on the definition nor does it provide an explanation of the field or entries to be submitted in the Annual Report Form. To assist City staff in consistently reporting data from year-to-year, the definitions or clarifications provided in Table 9-1 were developed as part of the JRMP preparation process¹.

¹ Note: these definitions were applied with the Annual Report form starting with FY 2013-14.



**Table 9-1
Annual Report Form Definitions for the IDDE Program**

Reporting Item	Definition or Clarification
Number of non-storm water discharges reported by the public	Inspection database (may be found under stormwater, wastewater, solid waste, street sweeping). Non-storm water discharges includes illicit discharges.
Number of non-storm water discharges detected by City staff or contractors	Inspection database (may be found under stormwater, wastewater, solid waste, street sweeping). Includes illicit discharges.
Number of non-storm water discharges investigated by the City	Inspection database (may be found under stormwater, wastewater, solid waste, street sweeping). Includes illicit discharges.
Number of sources of non-storm water discharges identified	Inspection database (may be found under stormwater, wastewater, solid waste, street sweeping). Includes illicit discharges.
Number of non-storm water discharges eliminated	Inspection database (may be found under stormwater, wastewater, solid waste, street sweeping). Includes illicit discharges.
Number of sources of illicit discharges or connections identified	Inspection database (may be found under stormwater, wastewater, solid waste, street sweeping). Includes illicit discharges.
Number of illicit discharges or connections eliminated	Inspection database (may be found under stormwater, wastewater, solid waste, street sweeping). Includes illicit discharges.
Number of enforcement actions issued	Inspections database. Enforcement action Notice of Violation (NOV) or higher.
Number of escalated enforcement actions issued	Inspections database. Any enforcement action issued for the same type of violation taken to the next level (e.g., Warning-> NOV or NOV -> stop work order/CDO, etc.)

Development Planning

1. Has the Copermittee implemented a development planning program that complies with Order No. R9-2013-0001?
2. Was an update to the BMP Design Manual required or recommended by the San Diego Water Board?

If yes, to the question above, did the Copermittee update its BMP Design Manual and make it available on the Regional Clearinghouse?

Reporting of the following data or statistics:

- a. Number of proposed development projects in review
- b. Number of Priority Development Projects (PDPs) in review



- c. Number of PDPs approved
- d. Number of approved PDPs exempt from any BMP requirements
- e. Number of approved PDPs allowed alternative compliance
- f. Number of PDPs granted occupancy
- g. Number of completed PDPs in inventory
- h. Number of high priority PDP structural BMP inspections
- i. Number of PDP structural BMP violations
- j. Number of enforcement actions issued
- k. Number of escalated enforcement actions issued

The Development Planning definitions or clarifications provided in Table 9-2 were developed as part of the JRMP preparation process.



**Table 9-2
Annual Report Form Definitions for Development Planning**

Reporting Item	Definition or Clarification
Number of proposed development projects in review	All projects submitted and in review without final approval. Report generated from City's TRACKiT of all PC submittal for the FY. TRACKiT report is PERM40 filter for Permit Numbers and Plan Check.
Number of PDPs in review	Priority projects submitted and in review and without final approval during FY. Report from TRACKiT for all PC submittals.
Number of PDPs approved	Priority projects issued approval or conditional approval letter by Public Services within FY.
Number of approved PDPs exempt from any BMP requirements	Tracked and determined by Public Services. Separate PDP tracking log.
Number of approved PDPs allowed alternative compliance	Tracked and determined by Public Services. Separate PDP tracking log.
Number of PDPs granted occupancy	Not granted occupancy; still under construction or other condition.
Number of completed PDPs in inventory	Public Services tracking sheet. Sum of existing and new projects for the fiscal year
Number of high priority PDP structural BMP inspections	Post-construction structural BMP annual inspections and re-inspections (not construction). Tracked by Public Services
Number of PDP structural BMP violations	NOV or higher violation issued
Number of enforcement actions issued	Enforcement action NOV or higher.
Number of escalated enforcement actions issued	Any enforcement action issued for the same type of violation taken to the next level (e.g., Warning-> NOV or NOV -> stop work order/CDO, etc.)

Construction Management

1. Has the City implemented a construction management program that complies with Order No. R9-2013-0001?

Reporting of the following data or statistics:

- a. Number of construction sites in inventory
- b. Number of active construction sites in inventory
- c. Number of inactive construction sites in inventory
- d. Number of construction sites closed/completed during the reporting period
- e. Number of construction site inspections



- f. Number of construction site violations
- g. Number of enforcement actions issued
- h. Number of escalated enforcement actions issued

The definitions or clarifications for Construction Management annual reporting are provided in Table 9-3.

**Table 9-3
Annual Report Form Definitions for Construction Management**

Reporting Item	Definition or Clarification
Number of construction sites in inventory	All projects with final approval and issued a storm water permit. Includes medium and high threat projects. In TRACKiT number of sites issued a storm water permit. In TRACKiT query report PERM130SW to filter for storm water permits.
Number of active construction sites in inventory	Construction sites that have on-going construction including demolition. In TRACKiT all sites with active construction as noted in the database.
Number of inactive construction sites in inventory	Construction sites that do not have active and on-going construction including demolition for more than 14 calendar days. In TRACKiT all sites with inactive construction as noted in the database.
Number of construction sites closed/completed during reporting period	Construction sites verified through inspection to be completed and with a "finaled" storm water permit. In TRACKiT the number of active construction sites shown as "finaled".
Number of construction site inspections	Number of inspections conducted during the reporting period for all active and inactive sites. Reported through TRACKiT.
Number of construction site violations	NOV or higher violation issued
Number of enforcement actions issued	Enforcement action NOV or higher
Number of escalated enforcement actions issued	Any enforcement action issued for the same type of violation taken to the next level (e.g., Warning-> NOV or NOV -> stop work order/CDO, etc.)

Existing Development

1. Has the Copermittee implemented an existing development management program that complies with Order No. R9-2013-0001?

For all four existing development categories (municipal, commercial, industrial and residential) the following data:

- a. Number of facilities or areas in inventory,
- b. Number of existing development inspections,



- c. Number of follow-up inspections,
- d. Number of violations,
- e. Number of enforcement actions issued, and
- f. Number of escalated enforcement actions issued.

The Existing Development definitions or clarifications provided in Table 9-4 were developed as part of the JRMP preparation process.

**Table 9-4
Annual Report Form Definitions for Existing Development**

Reporting Item	Definition or Clarification
Number of facilities or areas in inventory	Updated inventory for the year including verification from business licenses and inspections. Separate list for mobile businesses. Residential is defined by two area: The Village and The Coronado Cays.
Number of existing development inspections	Municipal inspections: All priority city facilities (e.g. City Hall, Comm. Center, golf course, etc.). Also parks with restroom facilities, sewer, and storm drain stations. Includes Hotel Del monthly inspections, as applicable. Commercial inspections are included. Residential defined by “patrols” and logged as number of hours of patrol per year. Recorded residential inspections included.
Number of follow-up inspections	All inspections performed to verify a compliance condition, requirement or BMP
Number of violations	NOV or higher violation issued
Number of enforcement actions issued	Enforcement action NOV or higher
Number of escalated enforcement actions issued	Any enforcement action issued for the same type of violation taken to the next level (e.g., Warning-> NOV or NOV -> stop work order/CDO, etc.)

Public Education and Participation

1. Has the City implemented a public education program component that complies with Order No. R9-2013-0001?
2. Has the City implemented a public participation program component that complies with Order No. R9-2013-0001?

Fiscal Analysis

1. Has the City attached to the Annual Report Form a summary of its fiscal analysis that complies with Order No. R9-2013-0001?



In addition, the JRMP Section 8 - Fiscal Analysis notes that the City will include the Fiscal Analysis Annual Review Form to facilitate the completion of the fiscal analysis and annual reporting requirements.

Annual Report Certification

The JRMP Annual Report Form must be signed and certified by completing the following statement:

I [Principal Executive Officer Ranking Elected Official Duly Authorized Representative] certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.