

SECTION C-9

EXISTING DEVELOPMENT

**PROGRAM EFFECTIVENESS ASSESSMENT
2006-07**





SECTION C-9, Existing Development

C-9.0 EXISTING DEVELOPMENT

C-9.1 Introduction

The existing development component of this report is composed of the following elements:

Section C-9.2, Industrial Program

Section C-9.3, Commercial Program

Section C-9.4, Residential Program

Section C-9.5, Common Interest Area/Homeowner Association (CIA/HOA) Program

C-9.2 Industrial Program (LIP Section A-9.1)

C-9.2.1 Organization Chart

Through the submittal of its organization chart, **Figure A-9.1** of the LIP, the County identified which Departments were responsible for the implementation of this stormwater program element. The organization chart has not changed during the reporting period.

C-9.2.2 Inventory

The County has developed a watershed based inventory of the identified industrial facilities within the County’s jurisdiction. Summaries of the industrial inventory are provided below.

**2006-07 Summary of Industrial Facilities by Watershed
San Diego Region**

Watershed	San Juan Creek	Dana Point Coastal Streams	San Clemente Coastal Streams	San Mateo Creek	Totals
Industrial Facilities With General Industrial Permits	7	1	2	0	10
Industrial Facilities Without General Industrial Permits	2	0	0	1	3
Totals	9	1	2	1	13



Santa Ana Region

Watershed	San Gabriel River/Coyote Creek	Anaheim Bay/Huntington Harbor	Santa Ana River	Newport Bay	Totals
Industrial Facilities With General Industrial Permits	0	1	1	1	3
Industrial Facilities Without General Industrial Permits	2	2	0	1	5
Totals	2	3	2	2	8

During the reporting period, one industrial facility (Algonquin Power) was added to the San Diego Region inventory. This facility is located within the Prima Deshecha Landfill and was previously believed to be covered under that facility’s General Industrial Permit. It was discovered this year that they have their own permit coverage, so they were added to the inventory. In the Santa Ana Region, one industrial facility closed down permanently (Catalina Pacific Concrete) so it was removed from the inventory. The County’s industrial facility inventory is updated on an ongoing basis and provided to the Regional Boards on an annual basis (see **Attachment C-9.2** of this report).

C-9.2.3 Prioritization

The County prioritizes industrial facilities in its inventory as high, medium or low based on their respective threat to water quality. Summaries of the prioritizations are provided below.

2006-07 Summary of Industrial Facility Prioritization

Industrial Facility Prioritizations	San Diego Region	Santa Ana Region	Total Number of Facilities
Facilities subject to General Industrial Permit	10	3	13
Section 313 Title III Sara	0	0	0
Facilities with a high potential for or history of non-stormwater discharges	0	0	0
Facilities tributary to and within 500 feet of an ASBS	0	0	0
Tributary to 303(d) water body where site generates the pollutant	0	0	0



SECTION C-9, Existing Development

Industrial Facility Prioritizations	San Diego Region	Santa Ana Region	Total Number of Facilities
Facilities within, directly adjacent to or discharging directly to an ESA	0	0	0
Number of mandatory high priority facilities	10	3	13
Number of "other" high priority facilities	0	0	0
Number of medium priority facilities	0	0	0
Number of low priority facilities	3	5	8
Total Number of Facilities	13	8	21

**2006-07 Summary of Industrial Facility Prioritization by Watershed
San Diego Region**

Watershed	San Juan Creek	Dana Point Coastal Streams	San Clemente Coastal Streams	San Mateo Creek	Totals
Number of high priority facilities	7	1	2	0	10
Number of low priority facilities	2	0	0	1	3
Totals	9	1	2	1	13

Santa Ana Region

Watershed	San Gabriel River/Coyote Creek	Anaheim Bay/Huntington Harbor	Santa Ana River	Newport Bay	Totals
Number of high priority facilities	0	1	1	1	3
Number of low priority facilities	2	2	0	1	5
Totals	2	3	1	2	8



SECTION C-9, Existing Development

C-9.2.4 Monitoring

The County has ensured that high priority industrial facilities within the San Diego Region of its jurisdiction are conducting annual stormwater monitoring. Several of the industrial facilities in the County's inventory participate in group monitoring programs.

C-9.2.5 BMP Fact Sheets

The activity-based Industrial/Commercial fact sheets developed as part of the Existing Development Program are numbered IC1 - IC24 and are included as **Exhibit A-9.II** of the County's LIP.

C-9.2.6 Inspections

The County inspects industrial facilities within its jurisdiction at the frequency determined by the priority ranking assigned to each facility as identified in **Section A-9.1.6** of its LIP. The inspections generally include a review of the material and waste handling practices, BMP implementation and any visual evidence of past or present unauthorized non-stormwater discharges.

Industrial Facility Inspection Frequency

Priority	Santa Ana Region	San Diego Region
High	Annually	Annually
Medium	Biennially (Once every 2 years)	As-needed
Low	Once Per Permit Cycle (5 years)	As-needed

A summary of the number of industrial facility inspections during the 2006-07 reporting period is presented in the table below.

Jurisdictional Industrial Facility Inspection Summary

Total Number of Industrial Facilities	Number of Facilities Inspected During the Reporting Period			
	High	Med	Low	Totals
13 (San Diego Region)	10	None in inventory	0	10
8 (Santa Ana Region)	3		0	3
Totals	13	0	0	13



SECTION C-9, Existing Development

The number of non-compliant facilities identified during these inspections is presented below along with information on follow-up inspections and enforcement actions conducted.

**Watershed Summary of Non-Compliant Industrial Facilities
San Diego Region**

Watershed	San Juan Creek	Dana Point Coastal Streams	San Clemente Coastal Streams	San Mateo Creek
Number of facilities out of compliance	0	0	0	0
Number of re-inspections due to non-compliance	0	0	0	0
Totals	0	0	0	0

Santa Ana Region

Watershed	San Gabriel River/Coyote Creek	Anaheim Bay/Huntington Harbor	Santa Ana River	Newport Bay
Number of industrial facilities out of compliance	0	0	0	0
Number of re-inspections due to non-compliance	0	0	0	0
Totals	0	0	0	0

The County continues to see a high level of compliance at industrial facilities within its jurisdiction. Through the inspection of the same high priority industrial facilities annually for the past four years, County staff has observed an increase in awareness and knowledge of staff assigned to NPDES compliance at most of these industrial facilities.

The industrial inspection information and database is updated on an ongoing basis and provided to the Regional Boards as a part of the Program Effectiveness Assessment submittal. The inspection information includes, at a minimum, inspection dates, inspectors present and the results of the inspection. The updated inspection database is included as an attachment to this report.



SECTION C-9, Existing Development

C-9.2.7 BMP Implementation

During industrial facility inspections, the County inspector determines the level of BMP implementation and also assesses the effectiveness of implemented BMPs. For each of the facility's areas of activity, the inspector observes whether BMPs are in place and effective. The inspector may encounter situations where BMPs are in place but are not effectively applied. The inspectors are trained to use their best professional judgment and decide how much time to allow the owner/operator to correct the problem.

**Watershed Summary of BMP Implementation at Industrial Facilities
San Diego Region**

Watershed	San Juan Creek	Dana Point Coastal Streams	San Clemente Coastal Streams	San Mateo Creek
Number of industrial facilities with BMPs fully implemented	7	1	2	No Inspections during reporting period
Number of industrial facilities with BMPs partially implemented	0	0	0	
Number of industrial facilities With no BMPs	0	0	0	

Santa Ana Region

Watershed	San Gabriel River/Coyote Creek	Anaheim Bay/Huntington Harbor	Santa Ana River	Newport Bay
Number of industrial facilities with BMPs fully implemented	No Inspections during reporting period	1	1	1
Number of industrial facilities with BMPs partially implemented		0	0	0
Number of industrial facilities With no BMPs		0	0	0

C-9.2.8 Enforcement

The County's Authorized Inspectors (Identified in **Section C-10** of this PEA) undertake enforcement activities against industrial facilities according to the County's adopted Water



SECTION C-9, Existing Development

Quality Ordinance and the countywide accompanying Enforcement Consistency Guide (**DAMP Section 4.0**).

Enforcement may be handled administratively or in more serious instances, be prepared for prosecution. As provided for in the Enforcement Consistency Guide, when selecting enforcement options, the County's inspectors ensure that violations of a similar nature are subjected to similar types of enforcement remedies. More severe enforcement options may be selected when a violator has either a history of noncompliance or has failed to take good faith actions to eliminate continuing violations or to meet a previously imposed compliance schedule.

During the reporting period, the County took no enforcement actions against the industrial facilities in its inventory.

C-9.2.9 Reporting

For non-compliant facilities that pose a threat to human health or the environment, the County provides oral or e-mail notification to the Regional Board within 24 hours. Following oral notification, the County sends a written report within 5 days detailing the nature of the non-compliance and any corrective action taken.

During the reporting period, the County identified no incidents of non-compliance at industrial facilities within its inventory that required notification of the Regional Boards.

C-9.2.10 Training

Since the training and outreach for the industrial program is done concurrently with the commercial program, the training efforts are summarized in **Section C-9.3.9**.



SECTION C-9, Existing Development

C-9.3 Commercial Program (LIP Section A-9.2)

C-9.3.1 Organization Chart

Through the submittal of its organization chart, **Figure A-9.2** of the LIP, the County identified which Departments were responsible for the implementation of this stormwater program element. Since being revised and submitted with last year's PEA, the organization chart has not changed.

C-9.3.2 Inventory

The County has developed a watershed based inventory of specific commercial sites/sources within its jurisdiction as required by the Third Term Permits. Summaries of the commercial inventory are provided below in the following tables:

2006-07 Commercial Site/Source Inventory Summary

Commercial Site/Source (by Permit Category)	Santa Ana Region (By Watershed)				San Diego Region (By Watershed)			
	San Gabriel River/Coyote Creek	Anaheim Bay/Huntington Harbor	Santa Ana River	Newport Bay	Aliso Creek	San Juan Creek	Dana Point Coastal Streams	Totals
Automobile mechanical repair, maintenance, fueling, or cleaning	2	31	2	2	0	2	0	38
Airplane mechanical repair, maintenance, fueling, or cleaning					0	0	0	0
Boat mechanical repair, maintenance, fueling, or cleaning			1*	1*	0	0	4	6
Equipment repair, maintenance, fueling, or cleaning					0	0	0	0
Automobile and other vehicle body repair or painting	0	6	0	0	0	0	0	6
Mobile automobile or other vehicle washing	0	0	0	0	0	0	0	0



SECTION C-9, Existing Development

Automobile (or other vehicle) parking lots and storage facilities					0	0	0	0
Retail or Wholesale Fueling					0	1	0	1
Pest control services					0	0	0	0
Eating or drinking establishments	68 in Santa Ana Region (restaurant inventory maintained by HCA)				1	39	23	63
Mobile carpet, drape or furniture cleaning	0	0	0	0	0	0	0	0
Cement mixing or cutting					0	0	0	0
Mobile high pressure or steam cleaning	0	0	0	0	0	0	0	0
Masonry					0	0	0	0
Painting and coating	0	2	0	0	0	0	0	2
Botanical or zoological gardens and exhibits					0	0	0	0
Landscaping (and hardscape installations)	2	0	0	0	0	1	0	3
Nurseries and greenhouses	1	0	1	0	0	8	0	10
Golf courses, parks and other recreational areas/facilities				1*	1	2	0	4
Cemeteries					0	0	0	0
Pool, lake and fountain cleaning	0	0	0	0	0	0	0	0
Marinas					0	0	5	5
Port-a-Potty servicing					0	0	0	0
Other commercial sites/sources determined to be significant contributors	0	0	0	0	0	0	0	0
Facilities tributary to 303(d) water body for pollutant generated on site					1	0	0	1



SECTION C-9, Existing Development

Facilities within/directly adjacent or discharging directly to ESA					0	0	37	37
Site tributary to and within 500 feet of ASBS	0	0	0	0	0	0	0	0
Total for all categories	5	40	3	4	3	53	69	177

Note: Grey shaded areas indicate inventory categories that were not requirements within the Santa Ana Region. A * symbol in a grey colored cell indicates that the County has added a commercial site/source within that category to its Santa Ana Region inventory, even though it is not a Permit requirement. Also, the total number of facilities (177) does not reflect eating or drinking establishments in the Santa Ana Region (68).

Due to new development in the unincorporated area of Ladera Ranch, the County’s commercial site/source inventory has increased from 153 in 2004-05 to 177 in 2006-07. The inventory is updated on an ongoing basis within the LIP and provided to the Regional Boards on an annual basis (see **Attachment C-9.2** of this report).

C-9.3.3 Prioritization

Within the Santa Ana Region, the County prioritized commercial sites/sources as high, medium or low based on their respective threat to water quality. Within the San Diego Region, the County maintains an inventory of commercial sites/sources predetermined as high threat to water quality according to **Section F.3.c.(2)** of the San Diego Permit. A summary of the County’s commercial site/source prioritization by watershed is provided in the following table:

2006-07 Summary of Commercial Site/Source Prioritization by Watershed

Commercial Site/Source Prioritizations	Santa Ana Region				San Diego Region			
	San Gabriel River/Coyote Creek	Anaheim Harbor/Huntington Harbor	Santa Ana River	Newport Bay	Aliso Creek	San Juan Creek	Dana Point Coastal Streams	Totals
Number of high priority facilities	0	0	0	1	3	53	69	126
Number of medium priority facilities	5	40	3	3	0	0	0	51
Number of low priority facilities	0	0	0	0	0	0	0	0
Total Number of facilities	5	40	3	4	3	53	69	177



SECTION C-9, Existing Development

C-9.3.4 BMP Fact Sheets

The activity-based Industrial/Commercial fact sheets developed as part of the Existing Development Program are numbered IC1 – IC24 and are included as Exhibit A-9.II of the County’s LIP.

C-9.3.5 Inspections

The County inspects commercial sites/sources in its inventory at the frequency shown in the following table:

Commercial Inspection Frequency

Priority	Santa Ana Region	San Diego Region
High	Once per permit cycle (5 years) ¹	As-Needed ²
Medium	As needed	N/A
Low	As needed	N/A

1. All high priority facilities must be inspected at least once by July 1, 2004

2. At least once per permit cycle (5 years)

The number of commercial sites/sources inspected during the 2006-07 reporting period as well as the cumulative number of inspections conducted since adoption of the Third Term Permits is presented in the following table:

2006-07 Jurisdictional Summary of Commercial Site/Source Inspections

Commercial Site/Source Category	Santa Ana Region	San Diego Region	Total Number of Inspections Since Permit Adoption	% Required Inspections Completed Under Third Term Permits
	Number of Sites/Sources Inspected in 2006-07			
Automobile mechanical repair, maintenance, fueling, or cleaning	1	0	6	100%
Airplane mechanical repair, maintenance, fueling, or cleaning		None in inventory	N/A	N/A
Boat mechanical repair, maintenance, fueling, or cleaning	1	4	8	100%
Equipment repair, maintenance, fueling, or cleaning		None in inventory	N/A	N/A



SECTION C-9, Existing Development

Automobile and other vehicle body repair or painting	0	None in inventory	0	N/A
Mobile automobile or other vehicle washing	None in inventory	None in inventory	N/A	N/A
Automobile (or other vehicle) parking lots and storage facilities		None in inventory	N/A	N/A
Retail or Wholesale Fueling		0	2	100%
Pest control services		None in inventory	N/A	N/A
Eating or drinking establishments	68	63	378	100%
Mobile carpet, drape or furniture cleaning	None in inventory	None in inventory	N/A	N/A
Cement mixing or cutting		None in inventory	N/A	N/A
Mobile high pressure or steam cleaning	None in inventory	None in inventory	N/A	N/A
Masonry		None in inventory	N/A	N/A
Painting and coating	0	None in inventory	0	N/A
Botanical or zoological gardens and exhibits		None in inventory	N/A	N/A
Landscaping (and hardscape installations)	0	0	1	100%
Nurseries and greenhouses	0	0	8	100%
Golf courses, parks and other recreational areas/facilities		0	4	100%
Cemeteries		None in inventory	N/A	N/A
Pool, lake and fountain cleaning	None in inventory	None in inventory	N/A	N/A
Marinas		5	8	100%
Port-a-Potty servicing		None in inventory	N/A	N/A
Other commercial sites/sources determined to be significant contributors	None in inventory	None in inventory	N/A	N/A



SECTION C-9, Existing Development

Facilities tributary to 303(d) water body for pollutant generated on site	1	N/A	4	100%
Facilities within/directly adjacent or discharging directly to ESA		37	37	100%
Site tributary to and within 500 feet of ASBS	None in inventory	None in inventory	N/A	N/A
Totals for all categories	Number of Sites/Sources Inspected in 2006-07		Total Number of Inspections Since Permit Adoption	% Required Inspections Completed Under Third Term Permits
	Santa Ana Region	San Diego Region		
	71	109	456	100%

Note: Grey shaded areas indicate inventory categories that were not requirements within the Santa Ana Region. Eating or drinking establishments are not required to be inventoried within the Santa Ana Region. As described under *Inspection Summary*, the Permittees have implemented a countywide Food Facility Inspection program and 68 food facility inspections were performed within the County’s jurisdiction in the Santa Ana Region this reporting period. Therefore, while those facilities are not inventoried, the inspections are counted for reporting purposes.

The total number of commercial sites/sources inspected during the reporting period increased from 148 in 2005-06 to 180 in 2006-07. Additionally, the County has conducted a total of 456 commercial site/source inspections since the Third Term Permits were adopted. As of the end of the 2006-07 reporting period, the County had performed 100% of the required commercial site/source inspections.

The number of non-compliant commercial sites/sources identified during the 2006-07 reporting period is presented below along with information on follow-up inspections and enforcement actions taken.

2006-07 Summary of Compliance by Watershed

Watershed	Number of Non-Compliant Commercial Sites/Sources		Number of Commercial Sites/Sources Re-inspected Due to Non-Compliance	
	2006-07	2005-06	2006-07	2005-06
Aliso Creek	1	2	1	2
Dana Point Coastal Streams	3	0	3	0
San Juan Creek	8	26	8	26
Anaheim Bay/ Huntington Harbor	4	5	4	5



SECTION C-9, Existing Development

Newport Bay	2	1	2	1
San Gabriel River/Coyote Creek	0	0	0	0
Santa Ana River	1	1	1	1
Totals	19	35	19	35

As the table above indicates, the number of non-compliant commercial sites/sources decreased significantly from 35 in 2005-06 to 19 in 2006-07. The County found the primary source of non-compliance to be eating or drinking establishments. Several incidents of non-compliance, particularly in the area of Ladera Ranch, involved poor management of trash by eating or drinking establishments in the same commercial complex. The County has found that in situations where multiple tenants share the same solid waste common area, compliance is achieved much quicker and more effectively by dealing directly with the property owner and/or property management company.

C-9.3.6 BMP Implementation

As part of commercial facility inspections the County inspectors determine the level of BMP implementation and also assess the effectiveness of the implemented BMPs. For each of the facility's areas of activity, the inspector observes whether BMPs are in place and effective. The inspector may encounter situations where BMPs are in place but are not effectively applied. The inspectors are trained to use their best professional judgment and decide how much time to allow the owner/operator to correct the problem. A summary of BMP implementation based on inspections conducted during the current reporting period is provided below.

2006-07 Summary of BMP Implementation

Watershed	Number of Facilities with BMPs Fully Implemented	Number of Facilities with BMPs Partially Implemented	Number of Facilities With No BMPs or BMPs Not Fully Implemented,	Number of Facilities Required to Implement or Upgrade/Modify BMPs
Aliso Creek	1	1	0	1
Dana Point Coastal Streams	62	7	0	7
San Juan Creek	45	8	0	8
Anaheim Bay/Huntington Harbor	63 Eating Facilities in SAR Inspected and found to	4	0	4
Newport Bay		2	0	2



SECTION C-9, Existing Development

San Gabriel River/Coyote Creek	have full BMP implementation	0	0	0
Santa Ana River		1	0	1
Totals	171	23	0	23

The commercial inspection information and database is updated on an ongoing basis and provided to the Regional Board as part of the annual Program Effectiveness Assessment submittal. The inspection related information includes, at a minimum, inspection dates, inspectors present and the results of the inspection. The updated inspection/inventory database is included as **Attachment C-9.2** of this report.

C-9.3.7 Enforcement

The County’s Authorized Inspectors (Identified in **Section C-10** of this PEA) undertake enforcement activities according to the County’s adopted Water Quality Ordinance and the accompanying Enforcement Consistency Guide. The enforcement mechanisms available are summarized in this section and detailed in **Section A-9.2** of the County’s LIP.

Water pollution enforcement may be handled administratively or in more serious instances, be prepared for criminal prosecution. As provided for in the Enforcement Consistency Guide, when selecting enforcement options, the County’s Authorized Inspectors ensure that violations of a similar nature are subjected to similar types of enforcement remedies. More severe enforcement options may be selected when a violator has either a history of noncompliance or has failed to take good faith actions to eliminate continuing violations or to meet a previously imposed compliance schedule.

During the 2006-07 reporting period, the County took the following enforcement actions against commercial sites/sources within its inventory:

2006-07 Summaries of Enforcement Actions

Watershed	Number of Notices of Non-Compliance Issued	Number of Administrative Compliance Orders Issued	Number of Cease & Desist Orders Issued	Number of Facilities Referred for Criminal Remedies
Anaheim Bay/Huntington Harbor	3	0	0	0
San Gabriel River/Coyote Creek	0	1	0	0



SECTION C-9, Existing Development

Three commercial sites/sources inspected during the reporting period (one eating establishment and two automotive repair shops) were issued a County Water Quality Ordinance Notice of Non-Compliance. The County also issued an Administrative Compliance Order to a commercial property owner in the City of La Habra where multiple tenant businesses were identified as the source of non-stormwater discharges and trash and other debris found to have impacted a County owned Flood Control Channel. The property owner and the businesses were given a specific amount of time to clean the County’s right-of-way as well as implement BMPs to prevent future discharges. The County worked with the City of La Habra to achieve a successful resolution to the problem.

C-9.3.8 Reporting

For non-compliant facilities that pose a threat to human health or the environment, the County provides oral or e-mail notification to the Regional Board within 24 hours. Following oral notification, the County sends a written report within 5 days detailing the nature of the non-compliance and any corrective action taken. During the 2006-07 reporting period, the County identified no incidents of non-compliance at any commercial site/source within its inventory that required notification of the Regional Boards.

C-9.3.9 Training and Outreach

Training

The County as Principal Permittee sponsored training to assist municipal staff in understanding the industrial and commercial components of the Existing Development Program. County inspector participation in the training conducted during the reporting period is summarized in the following table:

2006-07 Summary of Existing Development Program Training

Meeting	Department	Training Presentation	Training Dates	Number of Attendees
NPDES Inspection Committee	RDMD	EPA Overview	9/14/06	4
	RDMD	Cal OSHA Overview	9/14/06	4
	RDMD	Orange County Sanitation District Source Control Program Overview	11/15/06	2
	RDMD	Industrial Facility Inspection Training by Marc Brown, Santa Ana Regional Board Staff	4/19/07	6



SECTION C-9, Existing Development

Outreach

The County outreached to the industrial and commercial businesses within its jurisdiction to inform them of their responsibilities under this program. During the 2006-07 reporting period, this outreach effort included:

- Presentation to 250 paint contractors on pollution prevention BMPs at a Dunn Edwards sponsored seminar in Santa Ana on 4/19/07.
- Distribution of brochures, posters and the industrial/commercial BMP fact sheets through the website, field inspectors, at public facilities counters, etc.
- Posting information on the Existing Development Program (including the activity-based BMP fact sheets) on the County's webpage, www.ocwatersheds.com.



SECTION C-9, Existing Development

C-9.4 Residential Program (LIP Section A-9.3)

C-9.4.1 Organization Chart

Through the submittal of its organization chart, **Figure A-9.3** of the LIP, the County identified which Departments are responsible for the implementation of this stormwater program element.

C-9.4.2 Inventory

The County has developed a watershed-based map of residential areas within its jurisdiction in the San Diego Region. Residential areas that discharge directly to an ESA may be targeted for enhanced implementation of BMPs based on the activities of concern that are identified.

C-9.4.3 BMP Fact Sheets

BMP fact sheets have been developed as a part of the Existing Development program. The fact sheets include a description of specific BMPs for high threat residential activities that may cause the discharge of pollutants and provide a focus on the Pollution Prevention measures that the facility should implement. The activity-based residential fact sheets are numbered R1 – R8 and are included as **Exhibit A-9.II** of the County's LIP. There were no modifications to the fact sheets during the reporting period.

C-9.4.4 Enhanced Implementation

At the time this report is being written, a large portion of the unincorporated County along the Santiago Canyon corridor is being ravaged by wildfires. Communities such as Silverado, Modjeska, and Trabuco Canyon will have thousands of burned acres of land to contend with as they try to recover from the devastation. The County's Stormwater Program will be focusing a lot of effort on these residential areas during the 2007-08 reporting period.

C-9.4.5 Water Pollution Complaints/Incidents

The residential program relies upon observations by municipal employees working in or assigned to residential areas and on complaints received from residents through the water pollution problem reporting hotline and website.

The County tracks water pollution complaints under the ID/IC program and provides a summary of the number of complaints received and the source area associated with the complaint (e.g. commercial business, resident, etc.) as a part of **Section C-10** of this PEA.

C-9.4.6 Enforcement Actions

Enforcement actions taken by the County throughout its jurisdiction, including those against individual residents, are summarized in **Section C-10** of this PEA.



SECTION C-9, Existing Development

C-9.4.7 Outreach and Training

Outreach

Education and outreach targeted towards residents is a major component of the residential program. The County encourages the implementation of a set of designated BMPs for residents. The BMPs are presented in a series of fact sheets specific to high threat residential activities. The County has developed outreach efforts to encourage the use of the designated BMPs. This outreach has included efforts such as mailings, holding workshops, development and distribution of brochures, posters, fact sheets, posting information on the County's webpage, etc. Information on specific outreach efforts can be referenced in **Section C-6**.

Training

Successful implementation of the residential program relies on education of municipal employees that conduct activities in residential areas. For the County, it is primarily RDMD/O & M field program crews who are entering into residential areas on a routine basis to maintain the public infrastructure. Training efforts during the 2006-07 reporting period covering municipal activities are discussed in **Section C-5** of this PEA. While many of the field programs conducted by the County, such as street sweeping and drainage facility cleaning, are pollution prevention practices in of themselves, the field program crews are trained to notify the County's Authorized Inspectors (identified in **Section C-10**) of any issues impacting or having the potential to impact runoff from residential areas.



SECTION C-9, Existing Development

C-9.5 CIA/HOA Program (LIP Section A-9.4)

C-9.5.1 Organization Chart

The County utilizes the organization chart in **Section A-9.3** of the LIP to implement its CIA/HOA Program.

C-9.5.2 Inventory

The County has developed a watershed-based map of residential areas within its jurisdiction in the San Diego Region. Residential areas that discharge directly to an ESA may be targeted for enhanced implementation of BMPs based on the activities of concern that are identified. The residential map is updated on an ongoing basis within the LIP.

C-9.5.3 BMP Fact Sheets

BMP fact sheets have been developed as part of the Existing Development program. The fact sheets include a description of specific BMPs for high threat CIA/HOA activities that may discharge pollutants and provide a focus on the Pollution Prevention measures that the facility should implement. The activity based fact sheets that were developed are included in **Exhibit A-9.II** of the County's LIP. There were no modifications to the fact sheets during the reporting period.

C-9.5.4 Enforcement Actions

Enforcement actions conducted by the County throughout its jurisdiction, including CIA/HOA areas, are summarized in **Section C-10** of this PEA.

C-9.5.5 Outreach and Training

Outreach

As described in **Section C-9.4.7**, there are a number of ways in which the County performs general outreach to residents. HOA communities present a tremendous opportunity for outreach due to their organizational structure and the County encourages and promotes distribution of stormwater education material through association newsletters, association websites, etc.

Training

As reported in past years, the County has made several training presentations to HOAs utilizing the CIA/HOA training module (**Exhibit B-9.V** of the DAMP). This training module continues to be available on the County's website.



SECTION C-9, Existing Development

C-9.6 Existing Development Program Modifications

The County has evaluated the results of the assessment of the Existing Development Program to determine if any program modifications are necessary in order to comply with the Third Term Permits.

The following modifications have been made to **Section A-9** of the County's LIP during the 2006-07 reporting period and are included as attachments to this report:

- Updates to **Exhibit A-9.I** of the LIP the (existing development inventories) on an ongoing basis (included as **Attachment C-9.1** of this report)