SAN DIEGUITO WATERSHED

2003 - 2004

ANNUAL REPORT

WATERSHED URBAN RUNOFF MANAGEMENT PROGRAM

JANUARY 2005

Prepared by

SAN DIEGUITO WATERSHED COPERMITTEES:

City of San Diego, Lead Agency (Ended 1/17/05)
City of Escondido, Interim Coordinating Agency (Commenced 1/17/05)
City of Del Mar
City of Poway
City of Solana Beach
County of San Diego

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CERTIFIED STATEMENTS

Signed certification statements for the following Copermittees are located in Appendix A of this report.

San Dieguito Watershed Copermittees

City of San Diego, Lead Agency (Ended 1/17/05)

City of Escondido, Interim Coordinating Agency (Commenced 1/17/05)

City of Del Mar

City of Poway

City of Solana Beach

County of San Diego

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EXECUTIVE SUMMARY

1.0 Introduction

This Annual Report represents the Copermittees'[1] efforts during the Fiscal Year (FY) 2004 reporting period (July 1, 2003 to June 30, 2004) to develop and implement the San Dieguito River Watershed Urban Runoff Management Program (San Dieguito River Watershed URMP). This reporting period covers the first full year that the program has been in place. The Municipalities are proud to report that progress has been made and the Copermittees will continue to implement, improve and enhance these programs and activities over the next several years.

2.0 Report Organization & Summary

The San Dieguito Watershed URMP Annual Report consists of five sections, which are listed below and include of brief summary. Since this report is organized to focus on activities that are specific to the San Dieguito Watershed URMP, issues common to all or multiple watersheds have been moved to the Unified Watershed URMP. Responses to the Regional Water Quality Control Board's (Regional Board) October 8, 2004 13267 letter are incorporated within the document, as requested. The first category of comments in the 13267 letter has been addressed within standard sections of the Annual Report. Responses to the second category of comments have been addressed in writing (included as Appendix B).

Section I – Introduction

Section I of the Annual Report provides a summary of the program background, the program approach to improving water quality, the regulatory requirements that the Copermittees must meet and a general overview of the organization and content of the report.

Section II – Activity Implementation

The "Plan of Action" Section of the San Dieguito Watershed URMP identifies several activities and programs aimed at improving the quality of surface storm water runoff within the watershed. These activities focused specifically on the areas of water quality, land use planning, education, and public participation. Section II of this Annual Report provides a status report of the work completed on these activities and programs.

Section III – Water Quality Assessment

For 2004, the assessment of the San Dieguito Watershed yielded one constituent of concern with a high frequency of occurrence: total dissolved solids. Potential constituents of concern with a low frequency of occurrence designation were fecal coliform.

[1] Copermittees refers to the municipalities in the San Diego region subject to the National Pollutant Discharge Elimination System [NPDES] Municipal Storm Water Permit for San Diego Copermittees [Order No. 2001-01, NPDES No. CAS 0108758, "Municipal Permit"]

The constituents of concern for the San Dieguito watershed identified in 2004 were compared to the previous two years' water quality assessments (2002 and 2003). The following changes were noted for the San Dieguito Watershed in 2004 as compared to the previous two years' assessments.

- ✓ Total dissolved solids (TDS) is unchanged as an apparent constituent of concern with a high frequency of occurrence.
- ✓ Fecal coliform, nitrogen, phosphorus, color and total coliform are less apparent as constituents of concern.

Updated List of Constituents of Concern

Based on a combined analysis of the 2003 and 2004 assessments, total dissolved solids, fecal coliform and Total coliform remain constituents of concern (See Table II-1).

Updated List of High Priority Water Quality Issues

The data set considered to date is too limited to draw strong conclusions about high-priority water quality issues and associated actions. In addition, developing an effective list of activities that properly identifies and addresses significant water quality issues requires additional validation. Therefore, the high-priority water quality issue identified in the San Dieguito Watershed URMP remains the same in FY 2005: *Limiting recreation opportunities in coastal waters due to potential for pathogens*, and *potential impact on municipal and domestic water supply*. These high-priority issues and the constituents of concern identified in the 2002, 2003 and 2004 watershed water quality assessments will continue to be tracked (See Table II-1, Table II-2 and Table II-3). Beginning in February 2005, the Copermittees will convene a series of meetings to re-evaluate the watershed program, including its overall organization and management. A significant part of this effort will involve reassessing the program's water quality activities to target pollutants of concern in the San Dieguito Watershed.

Section IV – Effectiveness Assessment

Section IV provides an initial assessment of the implementation and effectiveness of the San Dieguito Watershed URMP for FY 2004. This assessment covers the first full year during which the watershed standards of the Municipal Permit (National Pollutant Discharge Elimination System [NPDES] Municipal Storm Water Permit for San Diego Copermittees [Order No. 2001-01, NPDES No. CAS 0108758]) were in effect.

Section V – Conclusions and Recommendations

Section V provides a conclusion of the Annual Report and makes recommendations for improving future reporting efforts, as summarized below.

Between July 2003 and June 2004, the Copermittees in the San Dieguito Watershed continued to implement the FY 2004 actions planned in response to the water quality assessment identified in the San Dieguito Watershed URMP. However, program responsibilities assumed by the City of San Diego did not receive funding due to mounting fiscal constraints that affected the entire organization. Since this fiscal issue has no immediate resolution, the City of San Diego will not be able to continue as the watershed's lead. To address this situation, the copermittees will meet in February 2005 to consider watershed organizational issues. In the meantime, the City of San Diego and the other copermittees have relied on

efforts that maximize water quality benefits, such as regional and jurisdictional education programs that target constituents affecting watersheds rather than specific watersheds, and a consolidated water quality monitoring program for all nine of the region's watersheds. Without specifically identifying the San Dieguito Watershed, these activities have benefited water quality in the absence of the copermittees' ability to implement a more focused approach.

These challenges make it clear that a continued, as well as thoughtful, collaboration and integration between regional, watershed and jurisdictional programs are key to the development of quality programs that are cost-effective, innovative, and responsive to the public's needs. However, the copermittees also recognize they can leverage and complement these jurisdictional and regional watershed resources by re-tooling the existing program to adopt a more watershed-specific approach. As stated previously, this effort will begin in February 2005.

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SECTION I INTRODUCTION

1.0 Background

The National Pollutant Discharge Elimination System (NPDES) Municipal Storm Water Permit for San Diego Copermittees (Order No. 2001-01, NPDES No. CAS 0108758, hereafter referred to as "Municipal Permit") requires the San Dieguito Watershed Copermittees to collaborate in the development of a watershed-based program that addresses surface storm water quality. The rationale for this need is simple: urban runoff does not follow jurisdictional boundaries and often travels through many jurisdictions while flowing to receiving waters. Therefore, the actions of various municipalities within a watershed regarding urban runoff can have an effect on water quantity but the effect on water quality is currently undetermined with scientific data. The Municipal Permit directs the municipalities who have land use authority within the San Dieguito Watershed to collaborate in developing and implementing a Watershed URMP. The purpose of the Watershed URMP is to identify and address the highest priority water quality issues/pollutants in each watershed. In addition, the Municipal Permit requires the Copermittees to develop activities that address education, public participation and land use planning.

2.0 Program Approach

In broad terms, the overall purpose of the San Dieguito Watershed URMP is to address surface storm water quality issues and any ongoing degradation within the San Dieguito Watershed. Fundamental to both establishing specific Watershed URMP goals and measuring achievement is the understanding that long-term solutions to water quality issues will be more effective if the issues are correctly and comprehensively identified and characterized. Based upon proper identification and targeted characterization, true "watershed-approach" solutions can then be applied.

The San Dieguito Watershed URMP's overall program goal and specific objectives that the San Dieguito Watershed Copermittees will strive to meet are listed below.

TO POSITIVELY AFFECT THE WATER QUALITY OF THE SAN DIEGUITO WATERSHED WHILE BALANCING ECONOMIC, SOCIAL AND ENVIRONMENTAL CONSTRAINTS.

Objective #1: Develop/expand methods to assess and improve water quality within the watershed.

Objective #2: Integrate watershed principles into land use planning.

Objective #3: Enhance public understanding of sources of water pollution within the watershed.

Objective #4: Encourage and enhance stakeholder involvement within the watershed.

3.0 Municipal Permit Requirements

The Municipal Permit requires that each Watershed URMP Annual Report shall, at a minimum, contain the following:

- Comprehensive description of all activities conducted by the watershed Copermittees to meet all requirements of each component of Watershed URMP section 'J' of the Municipal Permit;
- Public participation mechanisms utilized during the Watershed URMP implementation process;
- Mechanism for watershed-based land use planning;
- Assessment of effectiveness of the Watershed URMP;
- Proposed revisions to the Watershed URMP;
- A summary of watershed effort-related data not included in the annual monitoring report (e.g., special investigations); and,
- Identification of water quality improvements or degradation.

The Watershed URMP Annual Report is due to the San Diego Regional Water Quality Control Board (SDRWQCB) no later than January 31, 2005, and every January 31st thereafter. The reporting period for the Annual Reports must cover the previous fiscal year. As such, the FY 2004 Watershed URMP Annual Report will cover the reporting period from July 1, 2003 to June 30, 2004.

SECTION II IMPLEMENTATION

The Plan of Action (Section III) of the San Dieguito Watershed URMP includes several activities the Copermittees have or are intending to implement over the remaining life of the Municipal Permit in an effort to meet the four primary objectives of the program. Sections 1.0 to 4.0 below summarize the efforts the Copermittees undertook to develop the San Dieguito Watershed URMP and implement the Plan's activities during the FY 2004 reporting period.

1.0 Water Quality Activities

The Plan of Action Section in the San Dieguito Watershed URMP identifies proposed activities to address prioritized water quality issues. The sections below provide a status report of the work completed to date on those activities, which includes both regional and jurisdictional methods and programs used to address water quality issues in the San Dieguito Watershed.

1.1 Data Collection & Analysis

As stated previously, San Dieguito Watershed Copermittees have used a combination of jurisdictional and regional methods and programs to address identified water quality issues within the watershed. In terms of data collection and analysis, the Copermittees have been studying the utility of mechanisms for incorporating data sources outside of their historic and current Regional Wet Weather Monitoring Program. To do so, the Copermittees have developed a Watershed Assessment Framework to describe how data collection and analysis will be conducted using data from other existing sources, such as ambient bay, lagoon, and coastal receiving water monitoring citizen monitoring, outside agency monitoring, research monitoring, etc. The Watershed Assessment Framework was developed in conjunction with MEC Analytical Systems, Incorporated/ Weston Solutions, Incorporated (MEC/Weston) over a period of more than one year. The final version was completed in June 2004 and made accessible to the public through the Project Clean Water Webpage at:

http://www: Projectcleanwater.or/html/wg_monitoring_datawurmp.html

The Watershed Assessment Framework was intended to allow for uniform and consistent data assessment and management across watersheds in the county. One of the main goals of the document is to provide guidance as to how outside data can be incorporated into future watershed data assessments. The framework is designed to be adaptable to different circumstances in each watershed by describing the assessment strategy and by providing an overview of the statistical tools available to conduct watershed data analysis.

Further discussion of this activity is provided in Section 5.F of the FY 2004 Unified WURMP Annual Report.

1.2 Erosion Control Measures

Erosion control measures are implemented by all jurisdictions located in the San Dieguito Watershed. In aggregate, these programs prevent or reduce sediment and siltation impacts to the watershed's receiving waters. Moreover, the copermittees address this water quality issue through their respective jurisdictional programs. This effort to address a water quality problem potentially caused by excessive solids (total and/or suspended) discharged to the receiving waters results in benefits to water quality through the reduction of sedimentation and siltation. The reduction of sedimentation relates directly to habitat quality for the benthic community and reduces the potential pollutant load of constituents of concern that tend to associate with fine sediment particles, such as metals, bacteria and organics. Beginning with the City of San Diego, the various San Dieguito partners' efforts about this water quality issue are described below:

City of San Diego

The City of San Diego requires erosion control measures to be implemented for land development at all properties within the Coastal Zone that drain into Los Peñasquitos Lagoon or San Dieguito Lagoon. This requirement is part of the Local Coastal Program pursuant to the Coastal Act of 1976. Erosion control measures required under this City of San Diego Ordinance (Appendix C) (City Clerk Document #00-17068) include a grading plan that incorporates runoff control. The grading plan addresses the installation of sediment basins to ensure that sediment and siltation are prevented from affecting the San Dieguito and Peñasquitos Lagoon areas. This requirement addresses the sedimentation and siltation water quality problem potentially caused by excessive solids (total and/or suspended) discharged to the receiving waters. This activity results in benefits to water quality through reduction of sedimentation and siltation in the lagoon areas. Reduction of sedimentation relates directly to habitat quality for the benthic community, and reduces the potential pollutant load of constituents of concern that tend to associate with fine sediment particles, such as metals, bacteria and organics

County of San Diego

The County of San Diego also requires minimum performance standards to control pollution from any operations falling under a County permit, including:

1) Installation and maintenance of BMPs to prevent construction pollutants from contacting storm water and with the intent of keeping products of erosion from moving off site into receiving waters.
2) No discharges of pollutants (including sediment) from the site.

Every permittee is responsible and required to meet these performance standards and to certify selected BMPs will be installed, monitored, maintained or revised as appropriate to ensure effectiveness. BMPs must be installed in accordance with industry recommended standards (e.g., Caltrans or California Stormwater BMP handbooks, etc.).

For erosion control, the permittee must implement the following minimum Physical Stabilization BMPs or Vegetation Stabilization BMPs, or both, to prevent erosion from exposed slopes and flat areas (less than 3 percent). The County will not accept: tracking, mulch, wood chips, hydroseeding without watering as a means to protect exposed slopes from erosion, but such measures may be used to protect disturbed soil areas that are flat (less than 3 percent slope).

1. Prior to the rainy season, the permittee must remove or secure any significant accumulations of eroded soils from slopes previously disturbed by clearing or grading, if those eroded soils could otherwise enter the stormwater conveyance system or receiving waters during the rainy season.
2. Physical Stabilization through use of geotextiles, mats, jute mesh, fiber rolls, Bonded Fiber Matrix (BFM), Stabilized Fiber Matrix (SFM) or soil sealant, or other material approved by the County for stabilizing slopes, or Vegetation Stabilization may be used.

For sediment control, the permittee must provide protection of the grading site perimeter, environmentally sensitive areas, watercourses and at operational internal inlets to the storm drain system. Protection is accomplished through use of filtration devices, silt fencing, straw, coconut fiber or wood fiber-rolls, gravel bag barriers, or gravel inlet filters. Capture of sediment and dust is also be accomplished through use of storm-drain inlet protection and construction road stabilization.

Stormwater discharges from the site may not contain sediments that differ in composition or in amounts in excess of the sediments that would have been discharged from the site in an undisturbed condition. Monitoring of turbidity and suspended solids at similar undisturbed sites under similar storm conditions may be used to establish baselines for applying this standard [SSM §F.2.1.8]. This monitoring would apply to projects that directly discharge into or 200 feet upstream of a sediment impaired water body as described in the Clean Water Act Section 303d List of Water Quality Segments (available at the San Diego Regional Water Quality Control Board or at the State Water Resource Control Website http://www.swrcb.ca.gov/tmdl/303d_lists.html). For offsite sediment control, the permittee must eliminate off-site sediment tracking through use of stabilized construction entrances/exits and sweeping year round.

The County evaluates inspection frequencies on a regular basis, particularly when grading activities are being conducted during the official rainy season (October 1 through April 30). The need for additional inspections may vary depending upon several factors including: site conditions; previous violations; history of contractor's past performance; weather patterns; and priority of construction site.

Cities of Solana Beach, Escondido, Poway, and Del Mar

Within each jurisdiction, appropriate ordinances and regulations have been adopted to implement erosion control measures, thereby ensuring that project review includes a focus on water quality problems as they relate to erosion control design and implementation. The City of Solana Beach, for example, administers an extensive project review process that incorporates erosion control measures on virtually all projects, including grading and building permits. This process involves Council approval at the inception of the project, daily site inspections during the project's various development phases, and additional BMPs (if determined necessary by the City Associate Civil Engineer) after project completion.

- The City of Escondido incorporates erosion control BMP review, design, and implementation into a rigorous project application process that involves required pre-construction meetings and the installation of perimeter site controls prior to project commencement. This oversight continues during project development, as each project, regardless of size, is subject to, at a minimum, twice-weekly inspections to ensure appropriate erosion control measures are implemented. Examples of the City of Poway's minimum erosion control measures that must be installed and maintained include: adequate perimeter protection BMPs; sediment control BMPs; BMPs to control off-site

sediment-tracking; a weather-triggered response plan that must be implemented in the event that a predicted storm event reaches a 50 percent chance of rain; and the installation of erosion-prevention BMPs as soon as slopes are completed for any portion of the site. The City of Del Mar also administers a comprehensive erosion control program that incorporates the oversight and erosion control BMPS described above.

2003 San Diego County Firestorms

This last year the San Diego County fires diverted many agencies' efforts from their regular program responsibilities to addressing the aftermath of the firestorms that swept the region in October 2003. One of the issues comprehensively addressed by impacted jurisdictions included installing erosion control measures to prevent runoff in anticipation of seasonal rains. Resources provided by impacted jurisdictions, including the County of San Diego, the City of San Diego, Poway, and Escondido, quickly turned to stabilizing slopes to reduce safety hazards and sediment (an immediate pollutant of concern) from clogging the downstream flood control channels. Appropriate erosion control measures were installed throughout impacted areas of the county and residents were provided with free materials, such as gravel bags, to prevent runoff from their defoliated properties. It is understood that this was a comprehensive and coordinated effort conducted throughout the watershed and the county. The rapidity and efficiency with which agencies mobilized to respond to this crisis are to be commended.

1.3 San Dieguito Watershed Stewardship Initiative

The San Dieguito River Watershed Planning effort began in earnest in 2004. The City of San Diego Water Department, in partnership with watershed stakeholders, local jurisdictions, and other governmental agencies, is currently leading an effort to develop and implement the San Dieguito Watershed Stewardship Initiative (formerly called the San Dieguito Watershed Management Plan). The comprehensive watershed-based plan will focus on identifying priorities and strategies for the protection and restoration of water resources, native vegetation, water flows, riparian zones, beneficial uses of waters and overall water quality.

In FY 2004, the Watershed Working Group began its work in earnest. The Watershed Working Group established a scheme for its governance, a chairperson was selected, and an executive managing committee was formed. In response to question number 3 of the 13267 letter, the Watershed Working Group held six meetings in FY 2004. The San Dieguito Copermittees attended and participated in (see a typical list of meeting dates and attendees below) various aspects of these meetings. The scope of services for a consultant was finalized, consultant teams were interviewed, a consultant team led by Weston Solutions / MEC was selected, and a contract was negotiated for the consultant's work. The contract with the State for the Clean Water Act Section 205j grant was completed and signed.

- 10/28/04 Field Meeting - Attendees: City of San Diego, City of Del Mar; County of San Diego. Additional attendees: State Regional Water Quality Control Board (RWQCB), the Rancho Bernardo Planning Board and San Pasqual Community Planning Board

- 9/23/04 Field Meeting - Attendees: City of San Diego, County of San Diego, San Diego Co. Water Authority. Additional attendees: San Diego RWQCB, San Pasqual Community Planning Board, Cleveland National Forest.

- 8/26/04 Watershed Planning Guidance Group Meeting – Attendees: City and County of San Diego, City of Escondido, City of Solana Beach, City of Del Mar. Additional Attendees: Ramona Chamber of Commerce, Farm Bureau, Cleveland National Forest; RWQCB, San Pasqual Community Planning Group, San Diego Association of Governments (SANDAG).

The Policy Guidance Group (Watershed Stewardship Initiative Group or WSIG) was formed in late 2003 and began meeting in Jan 2004 and includes 20 to 25 members from different areas (upper , middle and lower) and interests (Governmental – [local and federal] organizations, non-governmental organizations, agriculture, planning group members, environmentalists and members of the public) in the watershed.

The WSIG spent time at their monthly meetings discussing issues of interest or concern (such as: water supply, land use, water quality, habitat preservation, agriculture, land development, pollutants, wetlands and impacts of fire on the watershed, to name a few) within the San Dieguito River Watershed. The WSIG heard presentations from experts on land use, water supply, water quality, habitat plans and agriculture.

The WSIG also toured the Upper and Lower Watersheds to discuss issues of interest or concern in the respective areas of the watershed. A tour of the lower watershed is scheduled for January of 2005.

The presentations by subject experts referenced above and field trips will assist members in becoming aware of the concerns of stakeholders in the watershed.

Weston will assist the WSIG in identifying goals, objectives and a future vision for the watershed. Weston will also be preparing an existing conditions report for the watershed during the next six months. The existing conditions report will provide the baseline for future actions the WSIG would like to see happen in the watershed.

1.4 Other Watershed Collaboration Activities

Other inter-jurisdictional collaboration in the watershed has involved the Cities of Solana Beach and Del Mar, who coordinate their efforts on several storm water issues. Since the border between the two cities is essentially a street (Via de la Valle), coordination between the two jurisdictions is necessary to adequately address storm water issues, which do not neatly fit into politically designated boundaries. For example, a row of restaurants that are located within the Solana Beach city limits drain directly into Del Mar's jurisdiction. On a few occasions, code enforcement officers from Del Mar have contacted Solana Beach staff to notify them about a potential violation. Such coordination has resulted in shared investigations, inspections, and the provision of technical assistance to non-compliant businesses. In addition, Solana Beach and Del Mar have coordinated their efforts regarding water quality issues that impact the San Dieguito Lagoon. Moreover, since a large portion of Solana Beach drains into the lagoon, Solana Beach staff monitors the creek as part of its dry weather program and shares the results with Del Mar, so they can better assess the quality of the water entering their jurisdiction.

2.0 Land Use Planning Activities

The Land Use Planning Context & Processes section of the Watershed URMP identifies several different activities and procedures designed to integrate watershed principles into comprehensive planning. The sections below provide a status report of work completed to date on those activities.

2.1 Jurisdictional Planning Activities

2.1.1 County of San Diego – General Plan

The County of San Diego is continuing to update its General Plan through the GP2020 Project. Although water quality and watershed protection principals will be included in the updated community plans and General Plan Elements, several steps still must be taken to update the general plan before this can occur.

One of the foundations to the General Plan update is the land-use designation map. At the present time, County Planning staff are working on the commercial and industrial land use maps, as well as the related portions of the Land Use Element. Acceptance of the residential land use distribution map by the Board of Supervisors has taken nearly two years longer than expected because of the Board-directed public review and referral process. Once the Land Use Maps and the Land Use Element are completed, the GP2020 Planners will focus their work on completing the road network planning and the Circulation Element. This effort will be followed by the development of the additional elements required under state law.

Given the delays in the completion and approval of the land use maps, no work has begun on any of the specific general plan elements, including those that would likely incorporate watershed policies and principles. Although formal policies have not yet been incorporated into the General Plan update, staff is reviewing all land use map changes with respect to watershed-specific protection issues, including habitat connectivity, water quality, flood plain protection, and water supply. In addition, the County intends to integrate standardized language on water quality and watershed protection into its community plans. Further, the County intends to develop objectives and policies to address water quality for inclusion in the General Plan elements, as appropriate.

Given the size and scope of the general plan update effort, these activities have been have taken much longer than originally anticipated. At this time, the County anticipates that drafts of the elements will not be available until summer 2005, at the earliest. Specific updates to the community plans will be developed once the Elements are completed. For further information regarding proposed schedules, updates, and contacts please visit the County of San Diego website at:

http://www.sdcounty.ca.gov/cnty/cntydepts/landuse/planning/GP2020/index.html.

2.1.2 City of San Diego – General Plan

The General Plan is the City's long-range plan for growth and development. Its influence is felt throughout City departments, as the plan establishes policies on a broad range of topics, including urban runoff management. The first element of the new General Plan to be adopted was the Strategic Framework Element. The Strategic Framework Element sets forth the City of Villages strategy. This strategy calls for the City's growth needs to be met largely through mixed-use redevelopment of existing commercial areas.

Moreover, to support mixed-use redevelopment, the strategy promotes greater use of transit and walking, reduced street-widening and fewer surface parking lots. All of these principles provide a framework for future development that will be sensitive to the protection of water resources.

A Five-Year Action Plan was adopted concurrently with the Strategic Framework Element. It identifies specific actions to be taken to implement the goals and policies of the Strategic Framework Element and includes actions addressing storm water and urban runoff and a new Conservation Element of the General Plan. Examples of specific action items include: "use pollution-prevention strategies supplemented by source control and treatment control Best Management Practices to prevent and reduce water pollution," and "support regional funding for water quality watershed planning and management."

Since the Strategic Framework Element was approved in 2002, work has been underway to prepare the Conservation Element along with the rest of the City's General Plan. The Conservation Element expands upon the water quality and watershed principles that were adopted as a part of the Strategic Framework Element. The complete General Plan update is anticipated to be heard by the City Council in late 2005.

General Plan elements currently being drafted relevant to urban runoff include:

1. *Conservation Element*. Work has been proceeding on the Conservation Element. Progress includes the distribution of seven public outreach e-mails, a public forum in December 2003, and several stakeholder group presentations. Staff has prepared a draft element and is presenting it to stakeholder groups for input. The Conservation Element addresses water quality, wetlands, pollution, and urban runoff. For example, proposed water quality policies are as follows:

- Adopt, amend and/or enforce City policies and regulations to reduce pollution from storm water and urban runoff.
- Minimize large surface parking lots.
- Secure funding to implement programs to protect and improve water quality.
- Apply funding to comply with the Regional Water Quality Control Board (RWQCB) municipal permit regulations to jurisdiction responsibilities related to "new development and significant redevelopment" projects under the rubric of watershed planning and watershed plan implementation.
- Support regional funding for water quality watershed planning and management.
- Support increased funding of federal and state programs that monitor, model, assess, and map ground and surface water resources.
- Support programs that address the causes of water quality pollution.
- Support monitoring programs to better assess the causes and severity of water quality issues.
- Support programs that monitor, model, and assess the environmental values of urban vegetation and open space related to water quality.
- Reduce the number of yearly beach closures.
- Require or encourage development practices through regulation that minimize alteration of natural hydrological conditions, minimize pollutant sources, and where possible, promote the preservation of natural drainage systems.
- Minimize the amount of graded land surface exposed to erosion.
- Improve quality of ocean outfall discharges.
- Strictly enforce regulations concerning sewage discharge from vessels into Mission Bay and San Diego Bay.

The complete Conservation Element draft will soon be available online at www.sandiego.gov/cityofvillages.

2. *Mobility Element*. The draft Mobility Element contains policies to reduce pollution through greater use of alternative modes of transportation, and to reduce large surface parking areas. For example, the Parking Management section of the element states that our parking strategies need to "address parking demand and supply and concurrently help implement General Plan goals (discussed above) for reducing storm water runoff and urban sprawl …"

3. *Monitoring Report*. In addition, a General Plan Monitoring Report (dated July 2004) was prepared using data gathered through June 2004. The report monitors progress toward implementing the Strategic Framework Element/City of Villages strategy and serves as a public education tool. The report addresses "Stormwater and Urban Runoff," and "Environmental Education" efforts and also includes a section on San Diego's "Sustainable Community Program Indicators." These indicators measure the region's long-term health, or sustainability, on a variety of topics. Many of the indicators relate to storm water runoff, including:

- No. 2 create neighborhoods we can be proud of (monitor street trees per mile),
- No. 3 "clean up our beaches and bays,"
- No. 5 "pursue energy independence (implement green building policy),"
- No. 6 complete multiple species conservation program (mscp) open space acquisition (provides large contiguous tracks of open space), and
- No. 7 "water conservation."

2.2 Watershed-Based Land Use Planning Mechanisms

Jurisdictions perform land use planning to identify important community issues--such as impacts to water quality--project future demand for services, anticipate potential problems, and establish goals, policies, and mechanisms for directing and managing growth. A detailed discussion of short- and long-term land use planning mechanisms available to watershed copermittees is provided in Section 5.E of the FY 2004 Unified WURMP Annual Report

2.2.1 Land Use Professional's Reference Manual: "Stormwater Quality and Watershed Protection - Looking at Alternative Development Policies"

Although this activity is discussed in 5.A. of the FY 2004 Unified WURMP Annual Report prepared by the County of San Diego, a brief update on its progress is provided below:

The Copermittees believe it is essential for land use professionals to understand thoroughly first, how land use development affects water quality, and second, why some tools are generally more effective than others at protecting water quality. During the 2003-2004 reporting period, the County of San Diego, in cooperation with the City of San Diego completed an internal draft Land Use Professional's Reference Manual. Budget constraints have stalled the completion of this document. However, once final, a copy will be forwarded to the Regional Board.

As a quick reference guide, the Manual provides educational materials for land use professionals (e.g., planners, engineers, architects, etc.), as well as decision makers, in identifying the major types of storm water pollution, possible sources of storm water pollution, the adverse impacts such pollutants have on the environment, and a listing of the tools land use professionals have at their disposal to address water quality issues resulting from development projects.

2.2.2 Watershed Management Planning

Please refer to Section 1.3 (San Dieguito Watershed Stewardship Initiative) in Section II (Implementation) within this San Dieguito WURMP Annual Report.

2.2.3 Additional Planning Activities.

San Dieguito River Park Concept Plan: This plan establishes the vision and goals for the future use of the San Dieguito River Valley. It describes the plan context and purposes, discusses planning considerations, and identifies plan objectives. It serves as a policy document for the San Diego River Park Joint Powers Authority. The overall goal of the plan is to: "preserve land within the Focused Planning Area of the San Dieguito River Park as a regional open space greenway and park system that protects the natural waterways and the natural and cultural resources; provides compatible recreational opportunities that do not damage sensitive lands; and provides a continuous and coordinated system of preserved lands with a connecting corridor of walking, equestrian, and bicycle trails encompassing the San Dieguito River Valley from the ocean to the river's source and beyond."

Plan objectives include:

- "Protection of Water Resources. Optimize the water quality and quantity of all groundwater resources and surface water bodies within the planning area through water conservation, erosion control, pollution control and restoration"; and
- "Preservation of the Natural Floodplain. Maintain the 100-year floodplain and sheet flow areas within the planning area in an open configuration with a natural channel and provide adequate area for the normal stream waters to meander."

City of San Diego planning staff is reviewing the San Dieguito River Park Concept Plan in preparation for City Council action to accept it.

San Pasqual Vision Plan: The purpose of the San Pasqual Vision Plan is to set forth a comprehensive vision for the San Pasqual Valley and action items for its protection. Plan goals include protecting the quality and capacity of the San Pasqual/Lake Hodges groundwater basin to ensure that this invaluable asset as a water resource is not compromised. Ensuring the long-term protection of the Valley's unique agricultural, biological, and water resources - to continually pursue the best protection of the Valley available is another goal envisioned by the plan. The Planning Department is responsible for implementing various components of this plan.

3.0 Educational Activities

3.1 Summary of Watershed Education Activities

This section describes actions taken by the Copermittees during this reporting period. To enhance the public's understanding of basic watershed principles and sources of water pollution. Making all residents aware of the importance of individual actions in protecting the region's water resources and promoting watershed stewardship is a crucial component of this educational program.

3.2 Summary of Watershed Education and Outreach Conducted

Although education and outreach activities are discussed in Section 1.D of the FY 2004 Unified WURMP Annual Report prepared by the County of San Diego, a summary of them provided below:

The Copermittees are refining current education programs to integrate watershed-based components. For the most part, education has been generally focused to meet the needs of different sub-regional and associated land uses within the watershed. Moreover, suitable Best Management Practices (BMPs) have been incorporated into educational efforts as determined appropriate. Supporting this broad-based but watershed-targeted approach are three key principles:

- What is a watershed?
- We all live in a watershed.
- Watershed stewardship (all individual actions within our watersheds accumulate to influence the health of the region's water resources).

Although the progress made on integrating these principles into the lives of various watersheds' residents is detailed in the Unified WURMP, one specific effort included a watershed survey that was conducted within the unincorporated areas of watersheds, the results, which are categorized by watershed and available at:

http://www.projectcleanwater.org/pdf/ed_tax/phone_survey_10-03.pdf

The County of San Diego has received the results of the public awareness surveys conducted during the last reporting period. This information will be incorporated into community-based data sets to be used in the development of locally tailored, watershed-based public education and marketing strategies. Programs will be refined as these strategies are implemented and evaluated. It is anticipated that these findings will establish baseline levels of knowledge of pollution prevention/source reduction activities in the watershed communities, and future progress will be measured against this baseline.

3.3 Education Action Plan

3.3.1 Public Presentations & Media

Public presentations are aimed at professional organizations and industry-specific associations. They incorporate both general watershed principles common to all watersheds and specific best management practices of interest to the particular audience to address pollution prevention. Core watershed concepts and principles are incorporated into public presentations and media opportunities. Refer to Table II-1 for a

summary of the public presentations and media events/releases conducted by the Copermittees during this reporting period. The FY 2004 Unified WURMP Annual Report also contains information regarding regional education efforts affecting the San Dieguito Watershed.

Table II-1. Summary of Public Presentations and Media Events in the San Dieguito Watershed.

Start Date	Event Title	Specific Audience	Estimated Audience	Location	Jurisdiction
7/9/03	Pro Pesticide Applicators Association	Golf Courses, Park and other Recreational Activities	300	California Center for the Arts in Escondido	Escondido
12/11/03	Grangetto's Horticulture Seminar	Various	120	Wild Animal Park	County of San Diego

The City of San Diego's "Think Blue" program has been identified by the EPA as a model for large urban watersheds and has document results of increased awareness and behavior changes in its annual surveys. To date, the program's message has stressed basic watershed concepts—that each individual's actions affect water quality downstream. Based on resident receptivity measured by surveys, future years' messages may deliver more complex information about watersheds and the pollutants that impact them. For more information regarding the "Think Blue" program, please refer to the FY 2004 Unified WURMP Annual Report.

3.3.2 Regional Watershed Brochure: What is a Watershed?

The Copermittees recognized early that there was a need to develop a simple, relatively cost-sensitive approach to informing the public about watershed issues. It was generally felt that watershed messages needed to provide information about not only common terms and concepts (e.g., definition of a watershed), but also specific and unique issues that were found in the watershed. To fill this need, the Copermittees elected to develop a brochure with maps, common terms and highlighted targeted messages, as determined by water quality assessments and other available information. To ensure consistency between watershed brochures, the Copermittees started the process of developing a model brochure.

Due to funding issues, the Watershed Brochure has been placed on hold. Instead, many of the educational watershed efforts are led by the City of San Diego's "Think Blue" campaign. Copermittees elected to invest in the "Think Blue" messages over the last two years with the generation of the movie-time commercials shown throughout San Diego County theaters and the PSA "Don't Pollute" messages. Additionally, the copermittees generated brochures for distribution within their jurisdiction. Lists of materials and some brochure examples can be found in Section II.4.3.1 of the Unified WURMP Annual Report.

3.3.3 Regional Watershed Poster: What Watershed Do You Live In?

Although this activity is discussed in the FY 2004 Unified WURMP Annual Report prepared by the County of San Diego, a brief update is provided here:

It is important for the public to become acquainted with the defining features of watersheds—where the water bodies are located, the high and low points, where water flows and discharges, and the various land uses within each watershed. Posters and maps are tools that illustrate these defining features in a visually attractive and simple way. To that end, the Copermittees initiated the development of a regional poster

template, with embedded map, for use throughout the San Diego region. To address watershed education, the regional watershed poster, "What Watershed Do You Live In?," is proposed for release after July 2005 due to a change of Lead Watershed Copermittee and lack of current year funding.

3.3.4 School Presentations: Water Quality and Watersheds

The Watershed Copermittees conducted 17 formal presentations that reached over 1,000 students throughout the watershed (See Table II-2).

Table II-2. Summary of School Outreach in the San Dieguito Watershed.

Date	Event Titles	Estimated Audience	Specific Audience	Location	Jurisdiction
1/7/04	Watershed Presentation	32	Fourth Grade Students	San Pasqual	Escondido
1/12/04	Watershed Presentation	32	Fourth Grade Students (Group A)	LR Green Elementary School	Escondido
1/12/04	Watershed Presentation	32	Fourth Grade Students (Group B)	LR Green Elementary School	Escondido
1/13/04	Watershed Presentation	32	Fourth Grade Students (Group A)	LR Green Elementary School	Escondido
1/13/04	Watershed Presentation	32	Fourth Grade Students (Group B)	LR Green Elementary School	Escondido
2/27/04	Watershed Presentation	35	School	Valley Elementary School	Poway
3/3/04	Watershed Presentation	32	Fourth Grade Students	Felicita Elementary School	Escondido
3/18/04	Watershed Presentation	32	Fourth Grade Students (Group A)	Felicita Elementary School	Escondido
7/18/03	Watershed Presentation	30	K-6	Solana Beach Ecology Camp	Solana Beach
8/8/03	Watershed Presentation	30	K-6	Solana Beach Ecology Camp	Solana Beach
10/21/03	Watershed Presentation	150	4-6	Sky Line Elementary School	Solana Beach
2/4/04	Watershed Presentation	140	4-6	Sky Line Elementary School	Solana Beach
4/2/04	Watershed Presentation	70	K-12	Solana Santa Fe Christian	Solana Beach
4/15/04	Watershed Presentation	70	K-12	Solana Santa Fe Christian	Solana Beach
3/30/04	San Pasqual Elementary School Presentation	146	Elementary School (K-6)	San Pasqual Elementary School	Unincorporated County
5/24/04	Mt. Woodson Elementary Water Splash Presentation	128	Elementary School (K-6)	Mt. Woodson Elementary School	Unincorporated County
6/4/04	Hanson Lane Elementary Presentation	138	Elementary School (K-6)	Hanson Lane Elementary School	Unincorporated County

3.3.5 Integrated Pest Management Campaign

Although this activity is discussed in Section 1.D of the FY 2004 Unified WURMP Annual Report prepared by the County of San Diego, a brief description of the Copermittees' efforts is included below:

As a group, the Copermittees elected to participate with the City and County of San Diego grant award to address pesticides within the watersheds. Although pesticides such as diazinon and chlorpyriphos may not be listed impairments for the San Dieguito Watershed, these pollutants are present throughout the region and are toxic to the environment. Therefore, eliminating, reducing, or preventing the introduction of pesticides from the San Dieguito Watershed promotes a healthy river environment. The Outreach Workgroup served as an important venue for the planning and development of the Proposition 13 Pesticide Research and Identification of Source and Mitigation (PRISM) grant entitled "San Diego Region Integrated Pest Management (IPM) Education and Outreach Project." The Workgroup agreed to defer $38,000 from its FY 2003-04 shared costs budget to be used for the reproduction of PRISM grant outreach materials during FY 2004-05. Moreover, the Workgroup dedicated all $40,000 of its FY 2004-05 regional outreach budget to the purchase of airtime for regional IPM public service announcements (PSAs) developed by the City of San Diego's Think Blue Campaign.

The PRISM grant consists of the development and implementation of a regional IPM program directed primarily towards residential pesticide users. The project is modeled on the University of California Cooperative Extension (UCCE) Statewide IPM Program, and has both regional and local components. Under the leadership of the UCCE, the regional program will target the reduction of pesticides in runoff from urban landscapes by incorporating an IPM educational component into the volunteer Master Gardener's Program. Volunteers, various workshops and community events will be held throughout the San Diego County region, which will benefit all watersheds.

3.3.6 Community Events

During this reporting period, the Copermittees participated in 12 community events to reach an estimated 45,480 participants, (See Table II-3). Watershed concepts and principles have been incorporated into booth displays and event activities using the tools listed in the school presentations. For future events, the Copermittees will continue to provide participants with the regional watershed map and a watershed display.

The City of Del Mar contacted & coordinated with the San Diego County Fair to put up a watershed map during the Fair that highlighted the two Del Mar watersheds (Los Penasquitos and San Dieguito). The City of Del Mar also provided public information about *Poop Pollutes* in the livestock barn during the Fair and arranged with the organizers of the Fair to post manure information on the website.

The City of Poway created a map of the city that shows the boundaries of the three watersheds which cross the city limits. This map was mounted on boards and is used at community events such as Earth Day and Community Days. The map is also interactive, as staff often has pushpins at the event and residents find their street on the map, and place the pin at their house. This helps the resident to identify which watershed they are in and to take ownership of their watershed. Refer to Table II-3 for an estimated audience.

Table II-3. Summary of Community Events in the San Dieguito Watershed.

Date	Event Title	Specific Audience	Estimated Audience	Location	Jurisdiction
9/13/03	Community Days – Watershed/Storm Water Booth	Residential	6,500	Community Park	Poway
9/28/03	San Dieguito River Valley Conservancy Eco-Fair	General Public – Residents	500	San Dieguito County Park/Lake Hodges	Unincorporated County
10/11/03	Ramona Fire Station Open House	General Public – Residents	300	Station 80	Unincorporated County
10/15/03	Target Specialty Products	Various	70	Lake Poway	Poway
11/7/03	Enviro Fair	General Public – Residents	100	Del Mar Fairgrounds	Escondido
11/7/03	Enviro Fair	General Public – Residents	100	Del Mar Fairgrounds	Del Mar
11/12/04	Rancho Santa Fe Fire Station Open House	General Public – Residents	300	Rancho Santa Fe Fire Station	Unincorporated County
4/24/04	Earth Day – Watershed/Storm Water Booth	Residential	1,800	Old Poway Park	Poway
5/8/04	Water Awareness	Residential	750	Fire Station 5	Escondido
5/16/04	Street Faire	Residential	5,000	Escondido	Escondido
6/5-6/6/04	Fiesta del Sol	General Public - Residential	30,000	Solana Beach	Solana Beach
6/23/04	San Diego County Fair	General Public – Residential	60	Del Mar Fairgrounds	Solana Beach

4.0 Public Participation Activities

The following sections summarize the activities and efforts made by the Copermittees to encourage public participation during this reporting period. Please note that this section is not exhaustive and only discusses the activities that were identified in the Public Participation section of the Watershed URMP. Many municipalities have worked with stakeholders on efforts such as the planner's reference manual, grant applications and water quality data collection. The Copermittees felt that it was not necessary to reiterate these activities in this chapter, since such public involvement and interaction are discussed in the preceding chapters of this document.

4.1 Copermittee and Stakeholder Collaboration/Community Events

To address watershed-specific issues in developing the San Dieguito Watershed URMP, the participating Copermittees (the Cities of San Diego, Del Mar, Poway, Solana Beach, and the County of San Diego) held one full workgroup meeting. The meeting was held in November 2004. The Copermittees also solicited input from all stakeholders through email and postings of draft Watershed URMP documents on the Project Clean Water website (www.projectcleanwater.org).

Community Events: Several community events have been held during the FY 2004 reporting period. Each of the education and community outreach events provided an opportunity for public participation. A list of these events and the estimated audience numbers can be found in Table II-1, Table II-2 and Table II-3.

Direct Interaction: In addition to those methods already described, the Copermittees continued to rely heavily on the interaction of staff with members of the public during their regular job duties. As described further in the Jurisdictional URMPs, municipal staff with program implementation responsibilities received targeted training to increase their understanding of urban runoff issues. Staff interaction with the public provides an additional avenue for obtaining direct feedback from the public. Feedback and interaction were conducted during the discretionary permit review process, building permitting process, building inspections and public presentations and outreach campaigns.

4.2 Integration and Participation in Local Planning Activities

Watershed planning has become an issue of increasing importance over the past few years. Various local planning efforts provide forums for exploring both the development of watershed and jurisdictional activities and programs. The relationship of these efforts to the Watershed URMP development and implementation cannot be overstated since both efforts address complementary issues that rely on public participation for success.

Stakeholders within the San Dieguito watershed are in the process of developing a watershed management plan that will target various watershed issues, including water quality. As part of plan development, stakeholders within the watershed are attending regular meetings and providing valuable input on plan direction. For more information on the watershed management plan, please refer to Section 1.5 – *San Dieguito Watershed Stewardship Initiative* of this document.

4.3 Project Clean Water – San Dieguito Watershed Website

During this reporting period, Project Clean Water provided a venue for public participation and involvement in local watershed activities. The relationship of these efforts to Watershed URMP development and implementation cannot be overstated, since they address complementary objectives and all rely on public participation for success.

The Project Clean Water watershed website (http://www.projectcleanwater.org/html/ws_map.html) was revised in March 2002 to provide watershed-based resources. The Watershed Map page is the starting point of the watershed website. Visitors wishing to learn more about a particular watershed can simply "click" on a desired watershed in the Watershed Map. Once selected, the visitor is linked to the watershed's summary page and provided with additional link options. The visitor can view multiple informational pages on the San Dieguito River Watershed, which include:

- ✓ San Dieguito River Watershed Summary Page (main page)
- ✓ San Dieguito River Watershed Plan Page
- ✓ San Dieguito River Watershed Project Page
- ✓ San Dieguito River Watershed Activities Page

During FY 03-04, the San Dieguito River watershed web page received 1,287 hits while the San Dieguito WURMP website received a total of 531 hits. A monthly breakdown of the hits can be found in Table II-4 and II-5 below.

Table II-4: Number of 'Hits' on the PCW San Dieguito River Watershed Web Site.

July '03	Aug. '03	Sept. '03	Oct. '03	Nov. '03	Dec. '03	Jan. '04	Feb. '04	Mar. '04	April '04	May '04	June '04	Total
90	*83*	*114*	*100*	*96*	*121*	*121*	*121*	*134*	*99*	*87*	*121*	***1287***

Table II-5: Number of 'Hits' on the PCW for the San Dieguito River WURMP Web Site.

July '03	Aug. '03	Sept. '03	Oct. '03	Nov. '03	Dec. '03	Jan. '04	Feb. '04	Mar. '04	April '04	May '04	June '04	Total
31	*27*	*54*	*37*	*34*	*53*	*79*	*49*	*69*	*39*	*28*	*31*	***531***

4.4 Stakeholder Workgroups

4.4.1 City of San Diego Clean Water Task Force

The Clean Water Task Force met one time during the 2004 fiscal year, and sought public comment on all agenda items in addition to reserving time for public comment on non-agenda items (a copy of the agenda for this meeting is attached). See Appendix C. Some of the significant items discussed included:

- Sewer Spill Reduction Program Update (MWWD, City of San Diego)
- Update on Mission Bay Water Epidemiology Study Evaluation and Testing (City of San Diego)
- Low Flow Diversion Program Status Report (City of San Diego Transportation & Drainage Design Division)
- Mission Bay Contaminant Dispersion Study (Scripps Institute of Oceanography)
- Water Quality Project Funding (City of San Diego) (item was not discussed)

SECTION III WATER QUALITY ASSESSMENT

This section provides a brief summary of the assessment of the water quality constituents of concern in the San Dieguito watershed conducted by MEC for 2004[2]. To review the complete water quality assessment report, please refer to Section 7 of the *2003-2004 San Diego County Municipal Copermittees Urban Runoff Monitoring Report* prepared by MEC posted on the Project Clean Water website (www.projectcleanwater.org/html/wurmp_san_dieguito.html). In addition, based on the 2004 assessment data and constituent of concern results, this section provides an updated assessment of the high-priority water quality issues in the San Dieguito Watershed (an initial list of high priority and potential high priority issues was established in the San Dieguito Watershed URMP). Information regarding program implementation that is applicable to all watersheds has been moved to the FY 2004 Unified WURMP Annual Report.

1.0 2004 San Dieguito River Water Quality Assessment

1.1 Constituents of Concern Summary – 2004

A discussion of the methodology for this topic is located in the FY 2004 Unified WURMP Annual Report. Please refer to the table below for a summary of the constituents of concern for the San Dieguito River Watershed during FY 2004.

Table III-1. Summary Of Constituents Of Concern Assessment Comparison.

	Fecal Coliform	TDS	Nitrogen	Phosphorous	Color	Total Coliform
San Dieguito River 2002	♦♦	♦♦♦	♦♦	♦♦	♦♦	♦♦
San Dieguito River 2003	♦	♦♦♦				♦
San Dieguito River 2004	♦	♦♦♦				

♦♦♦- *Higher frequency of occurrence*
♦♦- *Medium frequency of occurrence*
♦- *Lower frequency of occurrence*

The constituents of concern for the San Dieguito watershed identified in 2004 were compared to the last two years' water quality assessments, as shown in Table III-1. The following changes were noted for the San Dieguito Watershed in 2004 as compared to the previous two years' assessments.

- ✓ Total dissolved solids (TDS) is unchanged as an apparent constituent of concern with a high frequency of occurrence.

[2] Note: the analysis was based on water quality monitoring data gathered between July 2003 and June 2004.

- ✓ Fecal coliform, nitrogen, phosphorous and color continue to be constituents of concern.
- ✓ Total coliform is less apparent as a constituent of concern.

Based on a combined analysis of the 2002, 2003 and 2004 assessments, total dissolved solids, fecal coliform, total coliform, color, phosphorus, sulfate and nitrogen remain constituents of concern (See Table III-2). Potential sources of the constituents of concern are identified in Table III-2. The Copermittees will continue to develop greater certainty of the sources of the constituents of concern as additional years of data are gathered and as the overall program is re-tooled to address COCs specific to the watershed.

Table III-2. Potential Sources/Causes Of Various Constituents In The San Dieguito Watershed.

Constituents of Concern:	Potential Sources / Activities:
Bacterial Indicators: Fecal Coliform bacteria, Total coliform	Human sewage from failed septic systems, sewer spills or homeless encampments; wildlife-including birds, dogs, coyotes, raccoons, etc; domestic animals-including livestock and pets.
Nitrogen	Fertilizers, sewage, failed septic system.
Total Dissolved Solids (TDS)	Fertilizers/pesticides, construction activities, groundwater, imported water. Although unconfirmed, pumped groundwater used for agricultural activities and irrigation may be contributing to a high TDS level.
Color	Eutrophication, construction runoff, suspended sediment/solids.
Phosphorus and sulfates	Fertilizers, industrial waste, construction runoff, suspended sediment/solids, sewage.

The City of San Diego's Illicit Connection Illicit Discharge (ICID) program tracks and inspects sources or potential sources of pollutants on a regular dry-weather basis as well as on a complaint basis. These efforts have produced some specific sources of pollution (see example below); however, it is unknown to what extent these offenders make up the resulting data shown in Table III-1 and III-2. Additionally, the high concentration of TDS for three consecutive years may be from a multitude of sources within the San Dieguito River Watershed or it may be from constituents not measured.

- San Diego City Storm Water staff initiated an investigation in the San Dieguito watershed on 3/18/04 based on a citizen complaint. An equestrian facility located on a creek tributary to the San Dieguito River was found to be discharging wash rack wastewater with highly elevated bacteria levels into the creek. The investigation resulted in Storm Water Code Compliance staff issuing a Notice of Violation for the discharges, and required changes in usage of the wash racks. In addition, the facility was referred to the RWQCB's Concentrated Animal Feeding Operation Program.

Other jurisdictions' dry weather data will be examined during the upcoming program year so that copermittees can comprehensively evaluate the water quality issues in the watershed. This process will be part of an overall restructuring effort that is planned to create a more pollutant-targeted watershed program.

1.2 Updated List of High Priority Water Quality Issues

The high-priority water quality issues, as well as other salient constituents of concern identified in this section, are tracked and reassessed through the yearly assessment and reporting process.[3] The updated constituents of concern and high-priority water quality issues lists, and the justification for how these lists were developed, follows.

Table III-3. Summary of Evaluation of Stressors and/or Constituents of Concern – Year 3 (2004).

Potential Water Quality Issue(s)	Constituents Of Concern, And/Or Stressors Or Conditions Addressed	High Priority?	Comments And Proposed Activities (Watershed URMP Section Numbers Provided In Italics)
Limiting recreation opportunities in coastal waters due to potential for pathogens	Bacterial Indicators	Yes	Bacteria have been identified by copermittees and the Regional Board as a priority in the region. Bacteria are identified as a pollutant in both the existing and proposed 303(d) lists. Addressing water quality issues which limit recreational opportunities is of paramount importance to all San Diegans both as a quality of life issue and to ensure the long term economic health of the region. Future efforts should be concentrated in developing a better understanding of bacteria sources as well as compilation and analysis of data relevant to this issue within watershed and region at large. Activity: Data Collection and Analysis *(Section 4.2.1)* SUSMP Implementation *(Section 4.2.2)*
Limitation to habitat value of water bodies	No data has been collected within the middle or lower portions of the watershed.	No	All of the bioassessment sampling sites were located within the upper reaches of the watershed, which are characterized by open space and minimal urban impacts to streams. As the bioassessment monitoring program is evaluated, consider relocating sampling locations within watershed to ensure collection of data within more urbanized basins. Activity: Data Collection and Analysis *(Section 4.2.1).* Erosion Control Measures for North County Areas Draining Into Los Peñasquitos Creek or San Dieguito Lagoons (City Document 00-17068) *(Section 4.2.3)*
Potential Impact on Municipal and Domestic Water Supply.	Total Dissolved Solids, Color, Phosphorus, Sulfate, and Nitrogen.	Yes	Municipal and domestic water supplies can be affected by a variety of factors that include urban runoff, imported water sources, etc. The 2002 proposed listing of San Dieguito River includes TDS, Color, Phosphorus, Sulfate and Nitrogen as indications of potential impacts to the beneficial uses associated with water supply in the watershed. Future efforts should focus on developing a better understanding of pollutants of concern to water reservoirs at the sub-watershed level with particular consideration on stressors associated with urbanization. Activities: Data Collection and Analysis *(Section 4.2.1)* Source Water Guidelines Protection Project *(Section 4.2.4)* San Dieguito Watershed Management Plan *(Section 4.2.5)*

[3] For information regarding the Copermittees methodology for assessing constituents of concern and high priority water quality issues, refer to the FY 2004 Unified WURMP Annual Report.

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SECTION IV EFFECTIVENESS ASSESSMENT

One of the most important components of a successful program is the development and implementation of a comprehensive program evaluation. The intent of the 2003-2004 evaluation is two-fold:

1) Assess the effectiveness of the management and implementation of the Watershed URMP at a programmatic level; and
2) Assess the effectiveness of the activities conducted to meet the program goals and objectives.

This section of the annual report discusses the status of these assessments and meets the requirements of Section J.2.i. of the Municipal Stormwater Permit by identifying and reporting on measures to assess the effectiveness of the San Dieguito River Watershed URMP.

1.0 Programmatic Assessment

The San Dieguito Watershed URMP's overall program goal and implementing objectives are:

TO POSITIVELY AFFECT THE WATER QUALITY OF THE WATERSHED WHILE BALANCING ECONOMIC, SOCIAL AND ENVIRONMENTAL CONSTRAINTS.

Objective #1: *Develop/expand methods to assess and improve water quality within the watershed* (Water Quality Activities);

Objective #2: *Integrate watershed principles into land use planning* (Land Use Planning Activities);

Objective #3: *Enhance public understanding of sources of water pollution within the watershed* (Educational Activities).

Objective #4: *Encourage and enhance stakeholder involvement within the watershed* (Public Participation Activities).

Achievement of these objectives was measured through the development, implementation, and completion of activities targeted for each objective. The status of these activities and how they relate to the Watershed URMP goals and objectives is outlined below.

Activities conducted by the San Dieguito River Copermittees also have been incorporated into the six hierarchical levels of targeted outcomes described in the Framework Document. The six levels are as follows:

Level 1: Compliance with Activity-Based Permit Regulations

Level 2: Changes in Knowledge / Awareness

Level 3: Behavioral Change / BMP Implementation

Level 4: Load Reductions

Level 5: Changes in Discharge Quality

Level 6: Changes in Receiving Water Quality

Documentation of Levels 1-3 is straightforward, whereas documentation of Levels 4-6 requires the development and implementation of scientific studies designed specifically to detect these issues. Moreover, the detection of changes in discharge quality and, in particular, changes in receiving water quality require the collection of data over several years to detect and change. Although the Copermittees have very few data sets that span several years, we are working to collect this information and improve the process. Conclusions from existing data will be conducted, but documentation of changes in water quality throughout the San Dieguito River watershed cannot yet be determined.

1.1 Level 1 Effectiveness (Permit Requirements)

The San Dieguito River Copermittees fulfilled the requirements of the Municipal Stormwater Permit and were in compliance during the 2003-2004 reporting period. It can be assumed that the Copermittees' efforts have had a positive effect on water quality. Table IV-1 outlines Level 1 Targeted Outcomes by relating each activity conducted by the San Dieguito Copermittees to one of the four objectives and the requirements specified in the Municipal Permit.

Table IV-1. Level 1 Targeted Outcomes

Permit Requirements (J.2)	Objective	Activities	Status
(a) An accurate map of the watershed	#2	• San Dieguito Watershed Stewardship Initiative	Consultant selected (Weston Solutions to prepare watershed plan)
(b) Assessment of receiving water quality	#1	• MEC 2003-2004 Urban Runoff Monitoring Report	Complete for 2003-2004
(c) Identification and prioritization of major water quality problems	#1	• MEC 2003-2004 Urban Runoff Monitoring Report	Complete for 2003-2004
(d) Implementation time schedule of short and long-term recommended activities for highest priority water quality issues	#1	• Data Collection & Analysis	Ongoing
		• IPM Campaign	Ongoing
(e) Identification of the Copermittee responsible for implementing each recommended activity, selection of Lead permittee, and time schedule for implementation	#1-#4	• County is Lead: Copermittees have been identified	Completed
		• Time schedule provided in WURMP and updated as necessary	Completed for 2003-2004

Permit Requirements (J.2)	Objective	Activities	Status
(f) Mechanism for public participation	#4	• Copermittee and Stakeholder Collaboration /Public Participation (meetings, e-mail and web)	Ongoing
		• Direct Interaction	Ongoing
		• Project Clean Water	Ongoing (website is updated as new information warrants)
		• Clean Water Task Force	Temporarily Suspended
		• See Table II-3 for a Summary of Community Events	Completed for 2003-2004
(g) Watershed-based education program	#3	• Public Presentations and Media/Watershed Element	Ongoing
		• See Table II-2 for a Summary of School Outreach	Completed for 2003-2004
		• Project Clean Water	Completed (updated as new information is made available)
(h) Mechanism to facilitate collaborative "watershed-based" land use planning	#2	• County General Plan Update	Ongoing
		• City of San Diego General Plan Update	Completed (proceeding with GP components)
		• San Dieguito River Park Concept Plan	Concept Plan awaits City Council review & approval
		• San Pasqual Vision Plan	City of San Diego Planning Department is responsible for implementation

1.2 Level 2 Effectiveness (Changes in Knowledge / Awareness)

During the last program year, the County of San Diego conducted a telephone survey of watershed residents concerning their awareness of watershed and water pollution issues. The survey was conducted in the unincorporated areas of five of the nine county watersheds, including San Dieguito. The survey asked questions regarding residents' behavior pertaining to water pollution, attitudes and preferences, and knowledge/awareness. Key findings related to this assessment include:

- Generally, the population in all of the watersheds behave in a manner that is, for the most part, consistent with public policy pertaining to urban runoff and pollution.
- A plurality of residents cited the Pacific Ocean as the most important body of water to their community.
- Knowledge of what is a watershed was less than knowledge regarding the function of the storm drain system.
- Resident knowledge, and/or lack of knowledge, generally correlates to behavior.
- Television and newspapers are the main media for messages about water pollution.

- Public outreach campaign monikers such as "Think Blue" are the more recognized water pollution slogans.

The survey's findings indicate that public outreach campaigns have been effective in delivering basic water pollution concepts. However, the survey also indicates that work still needs to be done regarding watershed concepts and issues specific to them. Moreover, the first few years of this effort has been successful in laying the foundation for the development of more complex messages. However, it remains to be seen if the public will be receptive to more specificity or if they still require more basic information. For example, some significant subgroups of residents are more difficult to reach than others due to language, mobility, and youth issues. Although the first survey reveals successes as well as persistent challenges, its results will be used to modify program direction and to serve as a baseline against which to measure the program's effectiveness in the upcoming years.

The following programs implemented by the San Dieguito River Copermittees may have contributed to an increase in knowledge and/or awareness of program participants.

- Project Clean Water
- Watershed URMP Workgroup
- IPM Campaign
- San Dieguito River Park Concept Plan
- San Pasqual Vision Plan
- See Summary of Public Presentation Table II-1
- See Summary of School Outreach Table II-2
- See Summary of Community Events Table II-3

Many of the programs listed above address multiple program strategies (i.e., development of a monitoring program coupled with an educational outreach campaign). As such, these programs provided education on general watershed concepts, as well as information on specific priority pollutants within the San Dieguito River watershed. Please see Section II Implementation for specific information on each of these programs.

1.3 Level 3 Effectiveness (Behavioral Change / BMP Implementation)

Based on the comprehensive programs undertaken region-wide and on a watershed basis, it can be assumed that the Copermittees' efforts have had a positive effect on water quality, although a direct correlation cannot be made at this time due to the program's youth and lack of water quality data. However, given the results of the watershed survey, it is likely that changes in behavior occurred through the implementation of the programs discussed in this document. Moreover, the Watershed Survey noted that resident knowledge generally correlates to changes in behavior—changes that are evidenced by BMP implementation, such as the proper use or disposal of animal waste, pesticides, and pool/spa water.

Erosion Control Measures

Activities associated with the programs listed above involved stakeholder participation in activities and decision-making processes, as well as the implementation of BMPs to reduce the impacts of urban runoff. These programs also provided information on general watershed concepts, as well as information on specific priority pollutants within the San Dieguito River Watershed.

1.4 Level 4-6 Effectiveness (Load Reduction and Changes in Water Quality)

The calculation of pollutant load reductions and the determination of water quality changes is a regional effort and require the collection of rigorous scientific information over several years. The Copermittees currently are analyzing existing information. Results of these analyses will be included in the Report of Waste Discharge to be submitted to the RWQCB in August 2005.

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SECTION V CONCLUSIONS & RECOMMENDATIONS

1.0 Conclusions

Between July 2003 and June 2004, the Copermittees in the San Dieguito Watershed continued to implement the FY 2004 actions planned in response to the water quality assessment identified in the San Dieguito Watershed URMP. However, program responsibilities assumed by the City of San Diego did not receive funding due to mounting fiscal constraints that affected the entire organization during the program year. Since this fiscal issue has no immediate resolution, the City of San Diego will not be able to continue as the watershed's lead. To address this situation, the copermittees will meet in February 2005 to consider watershed organizational issues. In the meantime, the City of San Diego and the other copermittees have relied on efforts that maximize water quality benefits, such as regional and jurisdictional education programs that target constituents affecting watersheds rather than specific watersheds, and a consolidated water quality monitoring program for all nine of the region's watersheds. Without specifically identifying the San Dieguito Watershed, these activities have benefited water quality in the absence of the copermittees' ability to implement a more focused approach.

These challenges make it clear that a continued, as well as thoughtful, collaboration and integration between regional, watershed and jurisdictional programs are key to the development of quality programs that are cost-effective, innovative, and responsive to the public's needs. However, the copermittees also recognize they can leverage and complement these jurisdictional and regional watershed resources by re-tooling their existing program to adopt a more watershed-specific approach. To begin this task, the copermittees will convene a series of meetings in February 2005 to explore ways to implement a more targeted program while balancing fiscal challenges.

Above all, the San Dieguito Watershed URMP and Annual Reports should be considered part of overall program development. The Copermittees have responded well to meet the challenges of implementing new and aggressive Municipal Permit requirements in a very short period of time. The Copermittees feel that they have made significant strides in developing a comprehensive storm water program that could serve as a model for other regions. It is also recognized that improvement and refinement is an important part of all program areas and the Watershed URMPs will need to be augmented over the long term as the Copermittees continue to develop a better understanding of the complex issues affecting the San Dieguito watershed. During the development and initial implementation of this program, the Copermittees have identified a few lessons learned over the past year that deserve mentioning.

- Evaluating program costs and identifying funding sources must remain a key focus.
- Activities and efforts should be addressed at the most efficient scale-- regional, watershed, or jurisdictional-- depending on the activity.
- Lastly, the region should continue to strive for more efficient collaboration among watershed stakeholders and efforts.

2.0 Recommendations

Based upon the updated water quality data discussed in Section III of the Annual Report and the activity effectiveness assessment completed in Section IV of the Annual Report, the Copermittees propose removing the SUSMP and Source Water Protection Guidelines from the individual WURMPs per the Regional Board's comments. The following improvements are recommended for consideration:

2.1 Recommended Program Improvements

The San Dieguito Watershed copermittees have developed an interim, short-term plan to comply with the WURMP permit requirements. The Copermittees are committed to meeting over the next five months to discuss and find mechanisms to resolve the leadership, funding and resource issues. We are committed to identifying solutions and a workable plan for FY 06 (including WURMP activities) by June 30, 2005.

The most meaningful and significant change to the watershed urban runoff management program efforts during the current and upcoming fiscal year (2005-06) will be to re-assess management and organizational responsibilities for the WURMP and Annual Report. Identifying leadership and task responsibility roles, resources, and funding will be the focus of the San Dieguito watershed Copermittees in the remaining five months of FY05. A preliminary list of short- and long-term activities to be refined and prioritized for FY 06 is provided below:

Short-Term Activities (February 1, 2005 – June 30, 2005):

- Develop a meeting schedule and work plan for the period 2/1/05 – 06/30/05
- Reassess overall watershed organization, including public participation opportunities
- Continue participation in the San Dieguito Watershed Initiative effort.
- Review existing water quality data; identify and review additional data, including jurisdictions' dry weather data
- Re-examine and prioritize/validate pollutants of concern
- Consider potential/likely pollutant sources
- Develop pollutant-focused water quality activities (short- and long-term) based on available data and resources
- Develop a watershed-based education program outline
- Determine feasibility of combining common watershed efforts with the San Dieguito Watershed Copermittees

Long-Term Activities (July 1, 2005 – next permit):

- Continue, revise and/or expand above short-term water quality activities based on copermittee and stakeholder collaboration and available resources
- Implement short- and long-term activities collaboratively developed and adopted by the copermittees based on available resources

Stakeholder involvement will be an essential part of the aforementioned planning process. The Copermittees will seek public participation and involvement in the process. The watershed copermittee

meetings over the next five months will provide sufficient time to incorporate a meaningful public participation process.

Additional Areas of Program Improvements:

- The San Dieguito Watershed copermittees will seek to identify areas of mutual program management and activity implementation to maximize the available resources. Under consideration is collaboration with the San Dieguito Watershed copermittees (of which four Copermittees are the same in both watersheds). But will also seek to identify the water quality problems or issues that are exclusive to this watershed and address them accordingly.

- The City of San Diego has dedicated significant resources to the development of the Watershed Initiative. In turn, several cities have participated in stakeholder meetings and have provided comments. When completed, the Watershed Initiative will provide additional information and data for the copermittees to consider—information that will be relevant to the WURMP. The Copermittees will discuss and evaluate these opportunities during the upcoming meetings.

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APPENDIX A

Signed Certification Statements

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APPENDIX B

Response to Regional Water Quality Board 13267 Letter

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APPENDIX B

RESPONSES TO OCTOBER 8, 2004 LETTER TO SAN DIEGUITO WATERSHED COPERMITTEES WPS: 10-5000.02:HAMMP

The following attachment is in reference to your letter issued pursuant to California Water Code Section 13267 dated October 8, 2004, directing the San Dieguito Watershed Copermittees to provide information regarding the implementation of the San Dieguito Watershed Urban Runoff Management Plan (San Dieguito WURMP). Cleaning up our beaches, bays and recreational waters is one of the San Dieguito Watershed Copermittees' highest priorities.

We welcome this opportunity to provide you with additional information about our various programs. Our responses to the specific comments fall into two categories. In the first category, where the Regional Board requested information within the FY 2004 San Dieguito WURMP Annual Report, the location of the requested information has been provided below. Some of the information has been included in the County of San Diego's Unified WURMP Annual Report and the location of these responses has been referenced accordingly. In addition, in some of this category's responses, we provided information below to further clarify issues. In the second category, where the Regional Board requested information as an attachment to the FY 2004 San Dieguito WURMP Annual Report, responses have been provided below. The responses below follow the same numbering system used in the October 8, 2004 letter, and comments from the letter have been italicized.

I. Program Implementation During the Annual Report's Reporting Period

1. *Section 2.3 of Section II of the Annual Report discusses erosion control measures implemented by the City of San Diego. In your response to this letter, please describe these erosion control measures in detail, and indicate if they differ from the City of San Diego's standard storm water construction and grading ordinances implemented throughout the City of San Diego. Also describe whether the erosion control measures are implemented within other jurisdictions in the watershed, or are only implemented within the City of San Diego.*

   RESPONSE: Please refer to Section 1.2 Erosion Control Measures located in Section II Implementation within this San Dieguito WURMP Annual Report. See also Appendix C at the end of this San Dieguito WURMP Annual Report for a copy of the City Clerk Document Number 00-17068, which shows the exact wording of required erosion control measures for North City areas draining into the San Dieguito or Los Penasquitos Lagoon. Although the City of San Diego constitutes the majority of the watershed, erosion control measures have been implemented by the County and other cities (Solana Beach, Del Mar, Poway and Escondido) who are participants in it. While these measures are described in each jurisdiction's JURMP, some examples of their efforts are included below and in the WURMP Annual Report:

   Within each jurisdiction, appropriate ordinances and regulations have been adopted to implement erosion control measures, thereby ensuring that project review includes a focus on water quality problems as they relate to erosion control design and implementation. The City of Solana Beach, for example, administers an extensive project review process that incorporates erosion control measures

on virtually all projects, including grading and building permits. This process involves Council approval at the inception of the project, daily site inspections during the project's various development phases, and additional BMPs (if determined necessary by the City's Associate Civil Engineer) after project completion. The City of Escondido incorporates erosion control BMP review, design, and implementation into a rigorous project application process that involves required pre-construction meetings and the installation of perimeter site controls prior to project commencement. This oversight continues during project development, as each project, regardless of size, is subject to, at a minimum, twice-weekly inspections to ensure appropriate erosion control measures are implemented. Examples of the City of Poway's minimum erosion control measures that must be installed and maintained include: adequate perimeter protection BMPs; sediment control BMPs; BMPs to control off-site sediment-tracking; a weather-triggered response plan that must be implemented in the event that a predicted storm event reaches a 50 percent chance of rain; and the installation of erosion-prevention BMPs as soon as slopes are completed for any portion of the site. Like other jurisdictions, the City of Del Mar requires extensive erosion control measures for its projects. The County of San Diego also requires minimum performance standards to control pollution from any operations falling under a County permit, including:

1) Installation and maintenance of BMPs to prevent construction pollutants from contacting storm water and with the intent of keeping products of erosion from moving off site into receiving waters.

2) No discharges of pollutants (including sediment) from the site.

2. *Section 3.2.3 of Section II states that a Memorandum of Understanding (MOU) was signed in 1991 to improve awareness of development projects near jurisdictional boundaries. In the next Annual Report, please provide a copy of the MOU and list the projects for which the MOU was specifically used in the San Dieguito watershed during the reporting period. In addition, since the MOU was signed prior to the adoption of Order 2001-01, please provide information regarding any changes or updates made to the MOU to address water quality and watershed-based issues.*

RESPONSE: In an effort to improve awareness of development projects near jurisdictional boundaries, the municipalities signed a Memorandum of Understanding in January 1991 (Appendix A.2 of the Unified WURMP Annual Report) The MOU established guidelines for the notification of land use and development actions approved by unincorporated County of San Diego and incorporated municipalities. These notification guidelines are based on project size, location, and type and are separate from the notification requirements under the California Environmental Quality Act (CEQA). To date, no revisions have been made to the MOU.

For a more detailed discussion of the 1991 MOU and a list of projects, please refer to the FY 2004 Unified WURMP Annual Report, Section E, prepared by the County of San Diego for a discussion of the 1991 MOU.

3. *Section 3.3.2 of Section II discusses the San Dieguito Watershed Stewardship Initiative, but does not discuss all of the Copermittees' involvement in the effort. In the next Annual Report, please indicate the activities conducted by each of the San Dieguito watershed Copermittees to participate in the watershed initiative.*

RESPONSE: Please refer to Section 1.3 San Dieguito Watershed Stewardship Initiative located in Section II Implementation within this San Dieguito WURMP Annual Report for a description of the meetings, discussions and level of participation from each of the Copermittees as they relate to the San Dieguito Watershed Stewardship Initiative.

The various jurisdictions within the watershed, including Escondido, Solana Beach, Del Mar, the City of San Diego and the County of San Diego, participated in the initial steps of the planning process, which commenced during the program year and involved their participation and collaboration with other stakeholders, some of whom represent non-governmental organizations. The first year's activities involved establishing a governance structure and prioritizing issues that affect the watershed. Although prioritizing watershed issues will continue in 2005, it is anticipated that this process will be completed during the calendar year and the development of a watershed plan will begin. Overall, the scope of this plan will address the protection and restoration of water resources, native vegetation, water flows, riparian zones, beneficial uses of waters, and overall water quality.

4. *Section 4.2 of Section II states that the Copermittees are focusing their education efforts on priority pollutants of concern that span several watersheds (such as pesticides). In the next Annual Report, please identify and describe the education efforts that were conducted specifically within the San Dieguito watershed for pollutants of concern that span several watersheds.*

RESPONSE: To date**,** the Copermittees have focused on implementing regional and jurisdictional programs that target pollutants of concern affecting various watersheds to maximize water quality benefits through the effective and efficient use of resources. Detailed discussions of cities' educational efforts within the watershed are reported in their respective Jurisdictional Urban Runoff Management Plan (JURMP) annual reports. The cities would prefer not to repeat these efforts in the WURMP Annual report, but refer to those documents for details, such as the number of impressions and the resources dedicated to local public education efforts that are relevant to the watershed.

Therefore, the FY 2004 Annual Report contains regional education efforts that were conducted by the City of San Diego, the lead copermittee in the watershed, and the jurisdiction that represents the majority of the population in it. However, given the transition in leadership responsibilities, the watershed copermittees will assess the current educational and outreach program during the remaining months of the 2004-2005 program year to determine the structure and implementation of this program to best address surface water quality issues that are unique to the San Dieguito Watershed. A revised work plan with specific activities will be developed by June 30, 2005.

Despite anticipated revisions to the education program's structure and focus, during the 2003-2004 reporting period, the City of San Diego demonstrated its ability to implement an effective education and outreach strategy. Moreover, the City's "Think Blue" program was identified by the EPA as a model for large urban watersheds, and documented results of increased awareness and behavior changes in its annual surveys. Watershed-based approaches to program implementation based upon permit-defined hydrologic units were determined to be inappropriate because the public's initial level of understanding did not support it. Moreover, in the first several years of program implementation, most residents' level of understanding is low or nonexistent, so the program's initial effectiveness relied on concise, clear, simple messages. Therefore, the City's education efforts have stressed basic watershed concepts –

that each individual's actions affects water quality downstream- without adding complexity to the message by identifying individual watersheds or a particular pollutant.

On a regional basis, County of San Diego, in cooperation with other Copermittees, is presently working on an Integrated Pest Management (IPM) Education and Outreach Project Grant, funded by the SDRWQCB, to address pesticide issues in the San Diego Region. During the reporting period, the grant agreement between the County and the SWRCB, as well as County subcontract agreements with the University of California Cooperative Extension and the City of San Diego, were executed. The Project will incorporate an IPM educational module within the regional Master Gardener's Program. Outreach activities conducted as part of this grant have not yet begun, and events are anticipated within all of the coastal watersheds.

The County is providing additional in-kind services ($65,000) to develop a project logo, slogan, talking points, PSAs, and other videos that can be used for training and outreach. The logo and slogan will be incorporated into printed educational materials, banners, mass media tools, Web sites, and other outreach activities as appropriate.

For further discussion of these regional efforts, please refer to the FY 2004 Unified WURMP Annual Report prepared by the County of San Diego.

5. *Table II-2 does not provide sufficient information to exhibit that watershed concepts and San Dieguito Watershed issues were addressed by the Public Service Announcements (PSAs) listed in the table. In the next Annual Report, please list only those PSAs which address watershed concepts and San Dieguito watershed issues, and list the content of the PSAs.*

   RESPONSE: Although not specific to the San Dieguito River Watershed, in FY04, the City of San Diego's "Think Blue" education, outreach, and advocacy campaign introduced two new public service announcements, *Photo Mosaic* and *Don't Trash Our Future*. *Photo Mosaic* addressed general storm water pollution prevention awareness and the concept that each individual's actions affect water quality downstream. *Don't Trash Our Future* addressed trash as a pollutant negatively impacting our beaches and bays.

6. *Section 4.3 of Section II discusses education activities that did not occur in the San Dieguito watershed and did not address San Dieguito water quality issues. For example, Table II-3 and Sections 4.3.3.1 and 4.3.3.2 discuss education activities that occurred outside the San Dieguito watershed. In your next Annual Report, please identify only those education activities which specifically occurred in the San Dieguito watershed and/or addressed specific San Dieguito water quality issues.*

   RESPONSE: The Copermittees elected to implement their regional and jurisdictional programs that target pollutants of concern affecting watersheds rather than specific watersheds in order to maximize water quality benefits through the effective and efficient use of resources. Therefore, the FY 2004 Annual Report does not contain education efforts that are watershed-specific. However, the San Dieguito River Watershed copermittees will re-examine the education and outreach strategy as part of their re-organization efforts, which will commence in February 2005.

The City of San Diego, the lead watershed Copermittee and the jurisdiction with the most significant representation in the watershed, has demonstrated its ability to implement an effective education and outreach strategy. The City's "Think Blue" program has been nationally recognized by the EPA as a model for large urban watersheds, and has documented results of increased awareness and behavior changes in its annual surveys.

In the first several years of program implementation, most residents' level of understanding is low or nonexistent, so the program's effectiveness has relied on concise, clear, simple messages. Therefore, the City's education efforts have stressed basic watershed concepts – that each individual's actions affects water quality downstream- without adding complexity to the message by identifying individual watersheds or a particular pollutant. Again, this approach will be re-evaluated by the copermittees beginning in February 2005.

7. *Section 4.3.2 of Section II states that a draft Regional Watershed Brochure will be developed by July 2005. In your next Annual Report, please provide an update on this effort and explain why this extended length of time is necessary for the brochure to be developed.*

   RESPONSE: Originally, a watershed brochure was planned by the watershed copermittees, but has been placed on hold due to funding issues. Many of the educational watershed efforts are led by the City of San Diego's "Think Blue" campaign. Copermittees elected to invest in the "Think Blue" messages over the last two years with the generation of the movie-time commercials shown throughout San Diego County theaters and the PSA "Don't Pollute" messages. Additionally, the copermittees generated brochures for distribution within their jurisdiction. Lists of materials and some brochure examples can be found in Section II.4.3.1 of the WURMP Annual Report.

8. *Section 5.1 of Section II discusses meetings and other efforts to foster Copermittee and stakeholder collaboration. In the next Annual Report, please provide summary information regarding the meetings held while developing and implementing the San Dieguito WURMP. Include the number of attendees, dates, content, public notification, and how stakeholders were identified and involved.*

   RESPONSE: Please refer to Section 4.1, Copermittee and Stakeholder Collaboration/Community Events, located in Section II Implementation within this San Dieguito River WURMP Annual Report.

9. *Section 5.4 of Section II identifies public participation activities that occurred outside the San Dieguito watershed and do not address the San Dieguito watershed. For example, presentations by the City of San Diego regarding Chollas Creek restoration should be included in the appropriate Annual Report, or it should be clarified how the presentations are related to the San Dieguito watershed. In your next Annual Report, please identify only those public participation activities which specifically occurred in the San Dieguito watershed and/or addressed specific San Dieguito water quality issues.*

   RESPONSE: .Please refer to Section 4.0, Public Participation Activities, in Section II Implementation located within this San Dieguito WURMP Annual Report**.**

10. *In the next Annual Report, please describe how the San Dieguito Watershed Copermittees coordinated with other jurisdictions within the San Dieguito watershed, such as Caltrans and watershed interest groups.*

RESPONSE: Please refer to Section 1.3 San Dieguito Watershed Stewardship Initiative located in Section II Implementation within this San Dieguito WURMP Annual Report. Please also refer to the response provided to question no. 3 in this document.

Other inter-jurisdictional collaboration in the watershed has involved the Cities of Solana Beach and Del Mar, who coordinate their efforts on several storm water issues. Since the border between the two cities is essentially a street (Via de la Valle), coordination between the two jurisdictions is necessary to adequately address storm water issues, which do not neatly fit into politically designated boundaries. For example, a row of restaurants that are located within the Solana Beach city limits drain directly into Del Mar's jurisdiction. On a few occasions, code enforcement officers from Del Mar have contacted Solana Beach staff to notify them about a potential violation. Such coordination has resulted in shared investigations, inspections, and the provision of technical assistance to non-compliant businesses. In addition, Solana Beach and Del Mar have coordinated their efforts regarding water quality issues that impact the San Dieguito Lagoon. Moreover, since a large portion of Solana Beach drains into the lagoon, Solana Beach staff monitors the creek as part of its dry weather program and shares the results with Del Mar, so they can better assess the quality of the water entering their jurisdiction.

11. *The Annual Report includes considerable amounts of generic or "boilerplate" text. This boilerplate text is often not necessary in order for the Regional Board to assess compliance and can at times prevent differences in watersheds from being distinguished. It also does not adequately describe how implementation of a particular program component is being implemented in a specific watershed. For your next Annual Report, please review the use of boilerplate text and consider reporting approaches to make the Annual Report more watershed specific, such as moving boilerplate text to the Unified WURMP Annual Report document. In addition, please review all boilerplate text to ensure that it is directly applicable to the San Dieguito watershed. Also, please describe how the program components covered by the boilerplate text were specifically implemented within the San Dieguito watershed.*

RESPONSE: As directed, boilerplate text applicable to multiple watersheds has been relocated to the Unified WURMP Annual Report. Text within the WURMP Annual Report relates to that watershed specifically.

In addition to serving as compliance documents, the WURMP Annual Reports are informational documents for public officials, management staff, and the general public who may be unfamiliar with the WURMPs. Moreover, the WURMPs were intended to be stand-alone documents. In an attempt to achieve consistency in language between WURMP documents across watersheds, the model WURMP Annual Report used "boilerplate" text.. Further, since the County of San Diego and City of San Diego have served as Lead Copermittees on eight (8) of the ten (10) watersheds in the San Diego Region, boilerplate text has been employed, particularly to discuss regional programs, in order to facilitate the reporting process, and ease the workload of staff,

The Copermittees have reviewed the information included in the FY 2002-2003 Annual Report to determine how the program components covered by the boilerplate text were specifically implemented within the San Dieguito River watershed. A summary is included below:

- Data Analysis and Management Project – During the FY 2002-03 the Copermittees determined that this project would first need to be conducted on a Regional scale. The Copermittees have developed a Watershed Data Assessment Framework to describe how data collection and analysis will be conducted using data from other existing data sources (such as ambient bay, lagoon, and coastal receiving water monitoring; citizen monitoring; outside agency monitoring; research monitoring; etc.). The Watershed

Data Assessment Framework was developed in conjunction with MEC Analytical Systems, Incorporated/Weston Solutions, Incorporated (MEC/Weston) over a time period of more than one year. The final version was completed in June of 2004.

The Watershed Data Assessment Framework is intended to allow for uniform and consistent data assessment and management across watersheds in the county. One of the main goals of the document is to provide guidance as to how outside data can be incorporated into future watershed data assessments. The framework is designed to be adaptable to different circumstances in each watershed by describing the assessment strategy and providing an overview of the statistical tools available to conduct watershed data analysis. This was specifically utilized in the San Dieguito watershed to determine the feasibility of the inclusion of the dry weather monitoring, coastal outfall monitoring, and third party data into the Water Quality Assessment Section of the FY 2003-04 Annual Report. Therefore, during the project development in the FY 2002-03 this was a regional project that was then finalized and applied specifically to the San Dieguito watershed in the FY 2003-04. For a further description of the Watershed Data Assessment Framework please refer to the Common Activities section of the Unified Annual Report.

- Integrated Pest Management During the FY 2002-03 reporting period the City of San Diego, as lead agency, applied for and was given preliminary approval for a pesticide mitigation grant from the SWRCB. This was a regional effort to secure regional grant funding that will then be applied to specific watersheds. During this reporting period, the County of San Diego, assumed the lead responsibility to develop and administer the grant. All progress made towards this activity was focused on the development of the scope of work and contractual agreements. A summary of the IPM strategy, approach and activity is presented in the Common Activities Annual Report. The Copermittees will support the project by in-kind contributions of additional educational materials, outreach activities, and sponsorship of workshops. In the future, activities related to this IPM project that are conducted within the San Dieguito Watershed and/ or which specifically relate to the San Dieguito watershed will be reported in the respective section of the San Dieguito WURMP Annual Report.

- 1991 MOU/Public Hearings/CEQA . These specified inter-jurisdictional planning processes described in the FY 2002-03 San Dieguito WURMP Annual Report all allow for the San Dieguito Copermittees to be notified and participate in the project review process of projects that may impact or affect the watershed.

- Land Use Planners Manual. The County of San Diego and the City of San Diego, two of the Copermittees in the San Dieguito Watershed, developed the Land-Use Planner's Manual. During the FY2002-03 the Manual was being developed on a regional basis. Once completed this manual could be tailored to serve as a training tool for the Copermittees within the San Dieguito watershed.

- Water Quality Assessment. This section of the FY 2002-03 contained "boilerplate text" regarding the methods used for collection of data and assessment processes. The section also included the San Dieguito watershed specific data that was collected and assessed during the FY 2002-03. Therefore, the Copermittees have determined to move the "boilerplate text" to the Common Activities section of the Unified Annual Report or reference the San Diego County Municipal Copermittees 2003-2004 Urban Runoff Monitoring Report when applicable.

In an effort to streamline the reporting process, and facilitate review by SDRWQCB Staff, future annual reports will contain minimal boilerplate text and discussions of regional activities will be moved to the Common Activities Section of the Unified WURMP Annual Report. All implementation sections and text directly related to the San Dieguito watershed are included in the San Dieguito WURMP Annual Report**.**

12. *The Water Quality Assessment conducted in Sections 2.0 and 3.0 of Section III is unclear in describing how "high priority water quality issues" are identified. For example, bacterial indicators are identified as a high priority water quality issue in Table III-4, even though they are not initially identified as having a high frequency of occurrence in Table III-2. A constituent's listing on the 303(d) list of impaired water bodies should be used to identify constituents of concern, since 303(d) listings have been validated. In your next Annual Report, please describe the process that will be used to identify constituents of concern and high priority water quality issues, and discuss how constituents of concern will be assessed in order to identify high priority water quality issues.*

    RESPONSE: In future Annual Reports, the process used to identify constituents of concern and high priority water quality issues will be modified for clarity. Although the detailed assessment of complex datasets from various monitoring programs at the watershed level is complex, the stepwise process used by the copermittees is straightforward.

    As part of the watershed-based water quality assessment, the following steps are generally taken in the data evaluation and analysis:

    (1) Identify potential constituents of concern that have been found to exceed administrative water quality reference standards and Basin Plan water quality objectives as well as the frequency, magnitude and duration of such exceedances;

    (2) Isolate potential constituents of concern shown to exceed reference values in a persistent and/or recurrent manner, consider bioassessment rankings and toxicity results;

    (3) Examine how any of the constituents of concern identified in step (2) above, may contribute to water quality degradation which would negatively impact designated beneficial uses;

    (4) Review and consider constituents on the Clean Water Act 303d list

    (5) Compare the constituents of concern with third party data that does not meet the quality control/quality assurance standards of the regional monitoring program and, therefore was not included in steps (1) and (2);

    (6) As a longer historical record is developed over multiple years of monitoring, assess constituent of concern data to see if there are any increasing or decreasing trends through time applying statistical analysis; and

    (7) Using steps 1 through 6 and best professional judgment, each Watershed Management Area identifies and prioritizes constituents of concern.

    Details of the assessment procedure are presented in Section 3.4 of the San Diego County Copermittees 2003-2004 Urban Runoff Monitoring Report prepared on behalf of the Copermittees by MEC Analytical Systems/Weston (Regional Monitoring Report).

In 2002, best professional judgment was used in identifying the constituents of concern because only limited data were available early in the permit cycle of the regional monitoring program. In 2003 and 2004 (current reporting period), steps (1) and (2) were addressed by using a frequency of occurrence approach of exceeding a benchmark value. This interim approach weighs cumulative wet weather mass loading data more heavily than the most recently available period of dry weather and coastal storm drain data, because the mass loading data has a more comprehensive list of analytes and has been collected for a longer period of time. Additionally, the dry weather stations typically are located in storm drain conveyances and may not be representative of receiving water quality. However, the wider spatial distribution of dry weather data versus the other data sets may provide a link to potential sources.

The triad of data (storm water chemistry, storm water toxicity and rapid stream bioassessment data) collected under the regional monitoring program is also evaluated using the triad decision matrix. This triad of monitoring data is utilized in a 'weight of evidence' approach. Storm water chemistry and storm water toxicity data provide an indication of the pollutant loads during a storm event and potential aquatic impacts during storm events to organisms. The stream bioassessment provides information related to the ecological health of the watershed and an indication of stream health effects from urban runoff. Stream bioassessment data not only provide information about the benthic invertebrate community present in the watershed, but also the quality and condition of the physical habitat.

The triad decision matrix is primarily intended to direct changes in the monitoring program using a consistent and scientific approach. The triad decision matrix is used as one step in the process of identifying additional monitoring needs, such as performing a Toxicity Identification Evaluation (TIE) study to identify the constituents causing toxicity. Once the constituent is identified, then that constituent is considered as a constituent of concern.

II. Program Implementation for Fiscal Year 2004-05

13. *The Regional Board views the Water Quality Activities section as a key section which should be a primary focus of the Annual Report. As stated in Finding No. 31 of the Permit, the Regional Board finds that "it is essential for the Copermittees to coordinate their water quality protection and land use planning activities to achieve the greatest protection of receiving water bodies." To achieve this goal, the Copermittees must identify and implement activities to eliminate sources and reduce loading of the pollutants causing the identified high priority water problems within the watershed.*

    The "water quality activities" identified in Section 2.0 of Section II of the Annual Report are inadequate. As a group, the activities do not specifically address likely sources of water quality problems within the San Dieguito watershed. For example, (1) implementation of Standard Urban Storm Water Mitigation Plans (SUSMPs) does not target existing sources of water quality problems; (2) implementation of the Source Water Protection Guidelines for New Development does not address existing sources of water quality problems; (3) implementation of activities identified in Table III-4 does not address the potential pollutant sources identified in Table III-3; and (4) the water quality activities identified for the San Dieguito watershed are the same as the water quality activities identified for the Penasquitos watershed, even though the two watersheds have different high priority water quality problems.

    The activities must be reassessed in light of the watershed's high priority water quality problems, and

reworked and expanded where appropriate. In your response, please identify the short and long-term activities that will be conducted to specifically target likely sources of water quality problems in the San Dieguito watershed (include an implementation schedule). It is recommended that the Copermittees generate a list of activities which can be conducted to address the sources of the watershed's high priority water quality problems. The list can then be evaluated to identify effective and efficient activities to be implemented. An example list is provided as Attachment 2.

RESPONSE: The San Dieguito Watershed copermittees are committed to reviewing, reworking, and redeveloping the watershed's water quality program, which requires a collaborative effort to develop and expand a list of targeted water quality activities that addresses pollutants of concern unique to the San Dieguito Watershed.

In general, the most meaningful and significant change to the watershed urban runoff management program efforts during the current and upcoming fiscal year (2005-06) will be to re-assess management and organizational responsibilities for the WURMP and Annual Report. Identifying leadership and task responsibility roles, resources, and funding will be the focus of the San Dieguito Watershed copermittees in the remaining five months of FY05. A preliminary list of short- and long-term activities to be refined and prioritized for FY 06 is provided below:

Short-Term Activities (February 1, 2005 – June 30, 2005):

- Develop a meeting schedule and work plan for the period 2/1/05 – 06/30/05
- Reassess overall watershed organization, including public participation opportunities
- Continue participation in the San Dieguito Watershed Initiative effort.
- Review existing water quality data; identify and review additional data, including jurisdictions' dry weather data
- Re-examine and prioritize/validate pollutants of concern
- Consider potential/likely pollutant sources
- Develop pollutant-focused water quality activities (short- and long-term) based on available data and resources
- Develop a watershed-based education program outline
- Determine the feasibility of combining common watershed efforts with the Penasquitos Watershed copermittees

Long-Term Activities (July 1, 2005 – next permit):

- Continue, revise and/or expand above short-term water quality activities based on copermittee and stakeholder collaboration and available resources
- Implement short- and long-term activities collaboratively developed and adopted by the copermittees based on available resources

Matters to consider while developing short and long-term activities:

- Stakeholder involvement is an essential part of effective planning. The copermittees would be remiss to independently create an activity list without providing an opportunity for public

participation. Stakeholders will be included or copermittees will coordinate with other San Dieguito Watershed organizations to review the initial list provided.

- Activity implementation schedules are directly tied to the availability of funding. Budgets for the FY06 will not be approved until June 2005 and will dictate implementation levels of the short-term activities. The activity list provided is a wish-list of activities.

- Since funding of additional program efforts is unknown for subsequent permit years, efforts may be combined with other organizations, deleted, or modified.

- The copermittees continue to focus resources on efforts that maximize water quality benefits, such as jurisdictional programs that target constituents of concern affecting watersheds rather than specific watersheds. At this point in the Permit, copermittees have well-established programs to eliminate or reduce pollutants from entering the storm drain system. By so doing, water quality improvement in the watershed is more effectively achieved than with fragmented efforts divided across multiple watersheds. Any watershed effort must not diminish jurisdictional programs by adding unneeded and unnecessary tasks.

- San Dieguito Watershed copermittees have conscientious and highly motivated professionals to develop and implement the various storm water pollution prevention programs required by the Municipal Storm Water Permit. Each jurisdiction is committed to participating and completing tasks for the Watershed, but realize that jurisdictional efforts also improve Watershed health.

14. *Section 2.0.3.2 of the Annual Report states that the City of San Diego is developing Source Water Protection Guidelines for New Development as a "water quality activity" to be implemented in the San Dieguito watershed. In your response, please indicate how the Source Water Protection Guidelines specifically apply to the San Dieguito watershed. In addition, please describe where and when the guidelines will be implemented, and what steps will be taken to achieve full implementation.*

    RESPONSE: The Source Water Protection Guidelines are not specific to any one watershed. Information has been removed from the individual WURMP Annual Reports.

15. *Section 3.2 of Section II discusses several items meant to serve as mechanisms for inter-jurisdictional planning collaboration. However, these items are essentially short-term pre-existing notification procedures, rather than mechanisms through which long-term inter-jurisdictional collaboration on watershed issues occurs. In your response, please provide any information on other methods that the Copermittees within the San Dieguito watershed will be using to implement long-term inter-jurisdictional collaborative planning.*

    RESPONSE: Since jurisdictional participants, boundaries, and political landscapes may change on an annual or permit basis, current collaborative agreements for the five-year permit term are flexible and allow for re-negotiations should any changes in participants or a permit occur. Moreover, short-term agreements suit inter-jurisdictional agreements when future permit requirements are unknown. For example, the 2001 MOU is a short-term agreement, while the 1991 MOU is a long-term agreement that has worked well in notifying other jurisdictions of actions occurring in another city. Additional long-term collaborative efforts will be discussed during the February 2005 meeting of the copermittees. For more details on inter-jurisdictional collaboration within the watershed, please refer to the FY 2004 Unified

WURMP Annual Report, Section E. However, a brief description of various inter-jurisdictional planning mechanisms is provided below:

1991 MOU

This MOU established guidelines for the notification of land use and development actions approved by the unincorporated County of San Diego and incorporated municipalities. As such, notification parameters are based on project size, location, and type. These notification guidelines are separate from the notification requirements under the California Environmental Quality Act (CEQA). The life of this MOU is long-term.

2001 MOU

All of the copermittees signed a MOU on December 3, 2001 with respect ot compliance with the National Pollutant Discharge Elimination System (NPDES) storm water permit regulations, including watershed regulations. The life of the MOU is commensurate with current permit plus six months, unless the copermittees agree to put a revised MOU in place sooner.

CEQA

Pursuant to CEQA, before a discretionary project (e.g., development proposal, ordinance amendment, general plan update, etc.) can bee approved by a jurisdiction, the project just undergo some form of environmental review. As part of this review, consideration must be given to impacts associated with flooding and water quality in all areas involved, regardless of jurisdiction. Most jurisdictions adopt CEQA notification policies that incorporate many procedures (e.g., directly notifying local and state agencies, organizations that may have an interest, etc.)

Public Hearing

Regarding the notification of public hearings, state law requires that all owners of real property located within 300 feet of the project receive notification of the hearing via mail at least 10 days prior to the hearing. The hearing notification must also be published in at least one paper of general circulation. Again, many jurisdictions adopt policies that incorporate these procedures in addition to other procedures (e.g., at least 20 different property owners are notified, etc.)

16. *Section 3.3.1 of Section II states that the draft Land Use Professional's Manual is to be available in spring 2004. If this document is available, please provide us with a copy and a date the document will be finalized. In addition, in your response to this letter, please clarify if planners within the San Dieguito watershed will be required to implement the manual, and if the manual will contain watershed-specific sections to ensure that planners are appropriately addressing the watershed-based water quality concerns of the San Dieguito watershed.*

RESPONSE: Developed as an educational tool, an internal draft of the Land Use Professional's Reference Manual was drafted by the County of San Diego, in cooperation with the City of San Diego, during the 2003-2004 reporting period. By identifying types of storm water pollution, possible sources of pollution, and pollutants' effects on the environment, the manual was designed to be a quick reference guide for land use professionals. Moreover, the manual was not intended to identify all

possible pollutants found within various watersheds. Because of suggested revisions to the manual and administrative issues that have slowed the completion of it, the copermittees anticipate revisiting the project by fall 2005. Once the manual is completed, a copy of it will be provided to the Regional Board.

For further discussion, please refer to Section 5A in the FY 2004 Unified WURMP Annual Report prepared by the County of San Diego.

17. *Section 4.2 of Section II states that the Copermittees are focusing their education efforts on priority pollutants of concern that span several watersheds prior to focusing on watershed-specific pollutants. Please identify and describe the upcoming education efforts specifically within the San Dieguito watershed that will be conducted for pollutants of concern that span several watersheds. Also please identify when education efforts on watershed-specific pollutants will begin in the San Dieguito watershed. Include information on the anticipated form, content, and location of the watershed-specific education efforts.*

RESPONSE: As previously noted, the San Dieguito River Watershed copermittees will reassess watershed-specific pollutants and their potential sources to develop a list of water quality activities that will be implemented in FY 06. Moreover, the copermittees are committed to conducting watershed meetings between February and June 2005 to develop a work plan for FY 06.

Although future plans involve shifting the watershed program to focus on issues unique to it, the City of San Diego's regional approach to watershed issues has been comprehensive and effective. The City applied its comprehensive and effective "Think Blue" education, outreach, and advocacy campaign to both its jurisdictional and watershed programs. As demonstrated by Figure B-1 below, the Think Blue program has been effective in elevating residents' awareness of environmental issues that affect their lives and the areas where they reside—including watersheds.

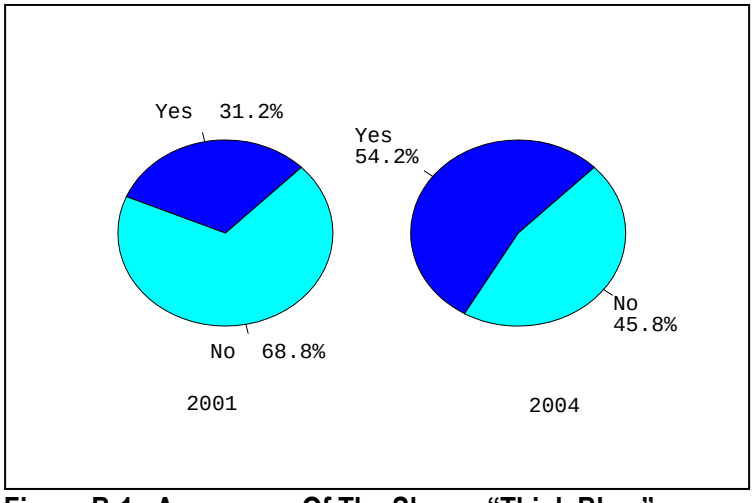

Figure B-1. Awareness Of The Slogan "Think Blue."

In the first several years of program implementation, most residents' level of understanding is low or nonexistent, and a program's effectiveness relies on concise, clear, and simple messages. Therefore,

the City's education efforts have stressed basic watershed concepts – that each individual's actions affects water quality downstream- without adding complexity to the message by identifying individual watersheds. Moreover, it was determined that integrating watershed-specific messages into the education program should not occur until the public had a basic level of understanding. Building on this basic educational foundation, it is logical, then, that a such as program will progress from general to more sophisticated and focused messages—a shift that will be considered by the copermittees based on resident receptivity and available resources.

For the balance of the program year, then, the City of San Diego will focus primarily on citywide strategies that represent common issues within multiple watersheds. Since these unified approaches have served to maximize water quality protection through the effective and efficient use of resources, the City did not identify watershed-specific activities other than those that span multiple watersheds. However, as noted previously, all of the copermittees will collaboratively reconsider this approach during the next few months.

18. *Please describe how data collection and analysis will be conducted using data from other existing data sources, such as coastal storm drain monitoring, ambient bay, lagoon, and coastal receiving water monitoring, citizen monitoring, outside agency and research institution monitoring, and Copermittee special investigations.*

    RESPONSE: Data collection and analysis will be conducted in accordance with the Watershed Assessment Framework that allows for uniform and consistent data assessment and management across watersheds. The framework is designed to be adaptable to unique circumstances in each watershed by describing assessment strategies and providing an overview of the statistical tools available to conduct watershed data analysis. Moreover, the guidance document can be used by individual watershed management groups to develop core management questions specific to the goals and needs of the stakeholders in the watersheds. It is anticipated that this framework will assist copermittees in developing action plans and watershed activities on an ongoing basis.

    For further discussion, please refer to Section 5.F in the FY 2004 Unified WURMP Annual Report prepared by the County of San Diego.

19. *Please describe how the concepts outlined in the Copermittee document titled "A Framework for Assessing the Effectiveness of Jurisdictional Urban Runoff Management Programs" will be used in assessing the effectiveness of the San Dieguito Watershed Urban Runoff Management Plan.*

    RESPONSE: Because the various urban runoff management programs in San Diego County—both watershed- and jurisdiction-based—are in their infancy, it is recognized that assessing a program's effectiveness will be a long-term and iterative process requiring substantial quality datasets upon which to make informed, scientific and economic decisions. To be effective, then, program priorities will be established based on available water quality data. Since successive years' data may yield changes in water quality results, copermittees' programs need to be flexible to either validate and/or respond to these data. The Copermittee framework for assessing urban runoff programs recognizes the need for such flexibility and incorporates an annual evaluation and planning process that accommodates it: i.e., water quality assessment, program planning, program assessment, and integrated assessment.

For further discussion, please refer to Section IV FY 2004 Unified WURMP Annual Report prepared by the County of San Diego.

20. *As the San Dieguito watershed program develops and changes, the WURMP should be amended to reflect those changes. New education activities, planning activities, water quality activities, etc. should be added to the WURMP, while discontinued activities should be removed. Please provide updated WURMP sections which have been amended in order to reflect changes to the San Dieguito watershed program.*

    RESPONSE: At this time proposed amendments include removing the SUSMP and Source Water Protection Guidelines from the individual WURMPS, as they are not specific to any one watershed. Please see Appendix E. However, as stated throughout the various responses in this document, the San Dieguito Watershed copermittees are convening in February 2005 to reassess their watershed commitments under the permit. This effort will include re-visiting and revising their short- and long-term goals.

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APPENDIX C

Erosion Control Ordinance

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CITY CLERK DOCUMENT NO. 00-17068

EROSION CONTROL MEASURES FOR NORTH CITY AREAS DRAINING INTO LOS PENASQUITOS OR SAN DIEGUITO LAGOONS.

Land development for properties within the Coastal Zone which drain into Los Penasquitos Lagoon or San Dieguito Lagoon shall comply with the following erosion control measures:

A. A grading plan that incorporates runoff and erosion control procedures to be utilized during all phases of project development shall be prepared and submitted concurrently with subdivision improvement plans or planned unit development plans where such development is proposed to occur on lands that will be graded or filled. Such a plan shall be prepared by a registered civil engineer and shall be designed to assure that there will be no increase in the peak runoff rate from the fully developed site over the greatest discharge that would occur from the existing undeveloped site as a result of the intensity of rainfall expected during a six-hour period once every ten years (the "six-hour, ten-year design storm). Runoff control shall be accomplished by establishing on-site or at suitable nearby locations catchment basins, detention basins, and siltation traps along with energy dissipating measures at the terminus of storm drains, or other similar means of equal or greater effectiveness.

B. Sediment basins (debris basins, desilting basins, or silt traps) shall be installed in conjunction with the initial grading operations and maintained through the development process as necessary to remove sediment from runoff waters draining from the land undergoing development. Areas disturbed but not completed prior to November 15 including graded pads and stockpiles, shall be suitably prepared to prevent excessive soil loss during the late fall and winter seasons. All graded slopes shall be stabilized prior to November 15, by means of native vegetation, if feasible, or by other suitable means. The use of vegetation as a means to control site erosion shall be accomplished pursuant to plans and specifications prepared by a licensed landscape architect or other qualified professional. Erosion control utilizing vegetation may include but is not limited to, seeding, mulching, fertilization, and irrigation within sufficient time prior to November 15 to provide landscape coverage that is adequate to achieve the provisions of this policy. Temporary erosion control measures, shall include the use of berms, interceptor ditches, sandbagging, hay bales, filtered inlets, debris basins, silt traps, or other similar means of equal or greater effectiveness. From November 15 to

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SAN DIEGO, CALIFORNIA

March 31, grading may be permitted provided the applicant conforms to the requirements of subsection C and submits monthly documentation within two weeks following the end of the preceding month to the City Engineer of the condition of the erosion control procedures for graded pads, slopes and stockpiles whenever precipitation during the month exceeds two (2) inches.

C. From November 15 to March 31, grading may occur in phased increments as determined by the City Engineer provided all of the following requirements have been met:

1. The increments shall be limited to those areas that have been prepared to control the effects of soil erosion. Control measures, such as sedimentation basins, detention basins and other facilities, shall be scheduled and placed in a sequence that shall minimize and control the off site transportation of sediments. Such erosion control measures shall be installed for such increments prior to commencing any grading that would be performed during the period between November 15 and March 31.

2. Detention basins and other control measures employed shall be designed to assure that there will be no increase in the peak runoff rate from the fully developed site over the greatest discharge that would occur from the existing undeveloped site as a result of the intensity of rainfall expected during a six-hour period once every ten years (the "six-hour, ten-year" design storm).

3. The applicant shall post a bond, for such areas to be graded, which shall remain in force and effect for one year after acceptance by the City. The bond shall be sufficient to cover the costs of any remedial grading and replanting of vegetation, including any restoration of lagoon, wetland, or other environmentally sensitive habitat areas adversely affected by the failure of the erosion control measures required pursuant to subsection C.2 above, as determined by the City Engineer. The bond will inure to the benefit of the City in case of noncompliance as determined by the City Engineer.

4. The applicant agrees to provide daily documentation to the City Engineer of the condition of the erosion control procedures for any 24-hour period in which precipitation exceeds 0.25 inches. Such documentation shall be provided within five working days of said 24-hour period. Failure to provide such documentation

of the occurrence of any significant discharge of sediments or silts in violation of this policy shall constitute automatic grounds for suspension of the applicant's grading permits(s) during the period of November 15 to March 31.

EROSION CONTROL MONITORING PROGRAM FOR NORTH CITY AREAS DRAINING INTO LOS PENASQUITOS OR SAN DIEGUITO LAGOONS.

1. Overall field review of grading operations will be performed by the City Resident Engineer on each grading project in the Coastal Zone.

2. Field review of erosion control devices, sedimentation basins, detention basins, and landscaping will be made by the City Engineer prior to the advent of the rainy season, and throughout the rainy season as necessary to monitor grading operations phased between November 15 and March 31. The City Engineer shall prepare a periodical report documenting the compliance of all individual projects with the grading and erosion control requirements. The report will be completed as of November 15 of each year.

3. The City Engineer will periodically review and prepare a report on the effectiveness of the runoff and erosion control measures established for the North City areas within the Coastal Zone that drain into Los Penasquitos or San Dieguito Lagoons. The initial report shall be completed within two years following the adoption of the erosion control measures and thereafter six months prior to any scheduled review by the California Coastal Commission of the Local Coastal Program for the City of San Diego. A copy of the report shall be submitted to the Executive Director of the Coastal Commission.