



THE CITY OF SAN DIEGO
REPORT TO THE CITY COUNCIL

DATE ISSUED: October 16, 2007 REPORT NO: 07-165

ATTENTION: Natural Resources & Culture Committee
Agenda of Oct. 24, 2007

SUBJECT: Urban Runoff Management Plans & Storm Water Ordinance
Amendment

REFERENCE: Resolution of the City Council regarding approval of the 2002
Jurisdictional Urban Runoff Management Plan, Resolution No. R-
296019, adopted on January 28, 2002

Ordinance of the City Council regarding prior amendments to the Storm
Water Management and Discharge Control Ordinance, 0-18975 N.S.,
September 10, 2001

REQUESTED ACTION:

1. Recommend that the City Council adopt the updated Jurisdictional Urban Runoff Management Plan, six updated Watershed Urban Runoff Management Plans, and new Regional Urban Runoff Management Plan; and
2. Recommend that the City Council authorize the Mayor to implement activities identified in the Jurisdictional, Watershed, and Regional Urban Runoff Management Plans; and
3. Recommend that the City Council adopt amendments to the Storm Water Management and Discharge Control Ordinance by amending Section 43.0305(b) to conform to the requirements of the Municipal Permit (Order No. R9-2007-0001; and
4. Recommend that the City Council adopt the Commercial, Industrial and Residential Best Management Practices contained in the Jurisdictional Urban Runoff Management Plan; and
5. Recommend that the City Council authorize the Mayor, or his designee, to maintain the authority to establish, delete, add to, or otherwise amend the Best Management Practices contained in the JURMP.

STAFF RECOMMENDATION:

1. Approve the recommendations.

SUMMARY:

The 1972 Clean Water Act established the National Pollutant Discharge Elimination System (NPDES) permit program to regulate the discharge of pollutants, including those from municipal

storm drain systems, to waters of the United States. Jurisdictions in the San Diego region, including the City of San Diego, are required to implement urban runoff management programs to reduce pollutants under the Municipal Storm Water Permit (Order No. 2001-01, NPDES No. CAS0108758). The U.S. Environmental Protection Agency (EPA) administers the Clean Water Act and has delegated authority to California's State Water Resources Control Board and its series of Regional Water Quality Control Boards (Regional Boards). The San Diego Regional Board issued the first Municipal Permit for San Diego Copermittees in July 1990 (Order No. 90-42), followed by a significantly revised Municipal Permit (Order No. 2001-01) on February 21, 2001. The most recent Municipal Permit was issued on January 24, 2007 as Order No. 2007-0001 ("2007 Municipal Permit"). The 2007 Municipal Permit requires each jurisdiction to submit to the Regional Board various new or updated Urban Runoff Management Plans which describe actions they will take to protect surface waters and achieve compliance with the 2007 Municipal Permit by January 24, 2008.

DESCRIPTION: The Urban Runoff Management Plans are the blueprints for the actions that the City will take to protect and improve water quality of the ocean, rivers, creeks, and bays in the region. In response to the 2007 Municipal Permit, significant improvements have been incorporated into the Urban Runoff Management Plans. Many of the changes are mandated by the 2007 Municipal Permit, while some of the changes were initiated by the City to improve its effectiveness, efficiency, and streamline resources. There are three types of Urban Runoff Management Plans —Jurisdictional, Watershed, and Regional—that are described below.

Jurisdictional Urban Runoff Management Program

The Jurisdictional Urban Runoff Management Plan, or JURMP, serves two primary purposes. First, it is a guide for City employees in implementing the storm water activities required of their department. Every City department that potentially impacts storm water has identified minimum and activity-specific best management practice (BMP) requirements for their department or division in the JURMP. Each department will be responsible for financing and implementing the BMPs, and keeping records of their activities to enable the Storm Water Pollution Prevention Division to perform an annual assessment of the City's actions. The Storm Water Pollution Prevention Division is the lead office for the City's efforts and provides technical expertise and guidance to all City departments to ensure implementation and compliance with the 2007 Municipal Permit. Second, the JURMP identifies the public education, enforcement, business inspection, development planning, and monitoring programs and associated Best Management Practices (BMPs) the Storm Water Pollution Prevention Division will implement and enforce over the five year life of the 2007 Municipal Permit.

A summary of notable improvements and requirements in the draft JURMP follows. Please note that as of the writing of this report the public review period for the draft URMPs, including draft minimum BMPs for municipal, commercial/industrial, and residential sectors, has either recently closed or not closed yet (the public comment period on the draft Urban Runoff Management Plans closed on October 9th, and the draft minimum BMPs public comment period closes on October 12th). The Storm Water Pollution Prevention Division will be including responses to public comments in the final Report to City Council. (Note: the City's Storm Water Standards Manual is concurrently being updated by January 24, 2008. Although the development

regulations in the Storm Water Standards Manual will be summarized in the JURMP, the Storm Water Standards Manual will be approved through an administrative public process established for implementing manuals of the City's Land Development Code by the Development Services Department. Therefore, approval of the Storm Water Standards Manual is not part of this requested action).

- Minimum Municipal BMPs

To increase consistency across municipal departments and simplify good housekeeping requirements for City staff, the Storm Water Pollution Prevention Division created minimum municipal BMPs for every City department and City operations and maintenance contractor to be used in their daily activities, as applicable. The minimum municipal BMPs are listed below.

1. Prior to starting activities, locate storm drain system and prevent pollutants from entering. Activity-specific BMPs are listed in Table 6.3-2 [of the Urban Runoff Management Plan].
2. Only clean rainwater can be discharged to the storm drain system. See Storm Water Management and Discharge Control Ordinance ("Storm Water Ordinance") Section 43.0305 "Exemptions from Discharge Prohibition" for allowable discharges.
3. Sweep up municipal areas after activities and/or spills. Hosing down pollutants into the storm drain is prohibited by Storm Water Ordinance (Section 43.03, et seq.). Use a broom, shovel, or other mechanical means to collect solids for reuse or disposal. Use absorbents to reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law or contact the Environmental Services Department, Hazardous Materials Management Program (ESD-HMMP) for assistance.
4. Annually inspect and clear all storm drain system catch basins, and drop inlets of debris or other foreign material at locations listed in the Division's municipal facility inventory (see Appendix III) according the "Storm Drain Inspection/Cleaning Schedule" in Table 6.3-2, "Buildings/Parking/Landscaping." Annually inspect open channels, and clear in a timely manner.
5. Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.
6. Keep materials and waste piles covered and, if possible, off the ground. Materials and waste stockpiles must be protected to prevent contact with rainwater and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition.
7. Routinely inspect vehicles for leaks, and service immediately if necessary. If vehicle is leaking, until vehicle is repaired use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste. Contact ESD-HMMP for assistance.
8. Capture and properly dispose of all power washing water. See fact sheet at <http://www.sandiego.gov/thinkblue/pdf/mobilebusinessbrochure.pdf> for proper power washing methods and disposal requirements.

9. Stencil storm drains in the Division’s municipal inventory (Appendix III) with “No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/Think Blue,” as appropriate. Check stencil legibility, and if necessary, re-stencil before September 30 of each year. Stencils and asphalt paint (blue on sidewalks/white on asphalt) are available from the Storm Water Pollution Prevention Division.
10. Reduce over-irrigation as a means of minimizing the volume of potentially contaminated water entering the storm drain system.”

The minimum municipal BMPs and each department’s activity-specific municipal BMPs in the draft JURMP were reviewed by the Public Utilities Advisory Commission’s Storm Water Sub-Committee, which made the following recommendations at their August 16, 2007 meeting:

1. Augment minimum municipal BMP number seven with language requiring repair of the vehicle as soon as possible.
2. For departments that may conduct asphalt and concrete demolition work, require recycling of broken up asphalt and concrete.
3. For departments that may perform dry wall, stucco or concrete work, designate concrete washout area for tools (in addition to mixers and other equipment).
4. For departments that may perform concrete sawcutting work, dry out and sweep up or wet-vac saw cutting water.
5. Replace the Metropolitan Wastewater Department’s BMP that originally read, “Leave as much vegetation on site as possible” with “Leave as much undisturbed vegetation on site as possible.”
6. Double the minimum frequency of storm drain monitoring and cleaning to twice per year, evaluate cleaning needs and adjust future cleaning schedule after two years. Frequencies should be increased or decreased as needed, but not below the every-other-year minimum.

The Storm Water Pollution Prevention Division incorporated the recommendations into the draft JURMP, except for recommendation number six. The General Services Department recommends not increasing the storm drain inspection and cleaning program from the 2007 Municipal Permit’s minimum frequencies identified in the draft JURMP until the program is implemented for several years to monitor conditions, gather data, and determine whether increased or decreased cleaning is needed at each facility.

- Minimum BMPs for Commercial, Industrial & Residential Development

The 2001 Municipal Permit required the City to designate a set of minimum Best Management Practices (“BMPs”) for municipal activities. The 2007 Municipal Permit expanded this provision and requires the City to designate a set of minimum BMPs for: 1) existing commercial/industrial sites and sources, 2) mobile businesses, and 3) residential areas/activities. As a result, staff proposes for adoption the minimum BMPs included as Attachment 1 to this report. The proposal is based on BMPs that staff have previously been recommended for implementation by the private sector, mandatory BMPs used by other jurisdictions, effectiveness of the BMP, and the “reasonableness” of the BMP.

Contrary to their previously voluntary nature, the 2007 Municipal Permit requires the City to require implementation of these minimum BMPs. Pursuant to San Diego Municipal Code (SDMC) section 43.0307(a), the “Enforcement Official” (the Mayor), is currently authorized to establish these minimum BMPs. Staff recommends that the resolutions that the Council uses to adopt the minimum BMPs also clarifies that the Mayor may delegate the authority to delete, add to, or otherwise amend the minimum BMPs to the Storm Water Pollution Prevention Division, provided that concurrence of the amendments is provided by the Mayor. After Council approval, the Storm Water Pollution Prevention Division would request that the Mayor approve the minimum BMPs, and subsequently publicize, and then enforce, mandatory implementation of the minimum BMPs.

Although the SDMC defers enforcement protocols to the Enforcement Official, it is not currently contemplated that the Storm Water Pollution Prevention Division would levy administrative citations or administrative civil penalties against first-time violators of the minimum BMP requirements. Instead, education would be used as the enforcement mechanism until there is more general public awareness of the minimum BMPs.

- Minimum Commercial and Industrial BMPs. Twenty-nine mandatory, minimum BMPs are proposed to apply to commercial/industrial sites and mobile businesses. Many of these are currently practiced by many businesses as a means of avoiding a discharge violation. An example is a requirement to maintain spill capture and cleanup materials on site. A few are currently required for businesses that are subject to other regulations such as the State General Industrial Storm Water Permit. An example of this is a requirement to develop and implement a Storm Water Pollution Prevention Plan. Some of the listed BMPs are currently enforced through other provisions of the Municipal Code, but are included on this list so that they will be part of the process for notifying and educating operators of commercial and industrial sites on required BMPs.
- Minimum Residential BMPs. Twelve BMPs are proposed for mandatory implementation at residential properties. These will apply to all residential types including single family and multi-family units. Most of these are already encouraged in storm water educational programs. Examples are proper management of pesticides and fertilizers, properly storing and disposing of hazardous materials, picking up pet waste in yards, and using drip pans to capture leaks and spills.

The process for public noticing and involvement is detailed in Attachment 2. The 30 day comment period for these minimum BMPs recently closed on October 12th and therefore a complete summary of public comments was not possible at the time that this report was prepared. Public comments will be summarized in the final Report to Council.

- Ordinance Amendment to the Storm Water Management & Discharge Control Ordinance

The City’s Storm Water Management and Discharge Control Ordinance (SDMC Section 43.0304 et seq., “Storm Water Ordinance”) states that, except as provided in SDMC section 43.0305, it is unlawful for any person to discharge non-storm water to a storm water

conveyance system. Section 43.0305 lists the various types of discharges that are exempt from the discharge prohibition. The existing list of discharge exemptions is generally based on the 2001 Municipal Permit. Because the 2007 Municipal Permit changes some of these allowable non-storm water discharges, the City's Storm Water Ordinance needs to be changed to conform. The proposed Storm Water Ordinance amendment would replace the existing list of exempted discharges with the list of exempted discharges from the 2007 Municipal Permit.

- New Development and Construction Regulations

The 2007 Municipal Permit includes new requirements that the City must implement during development project review and construction. City regulations that were enacted in response to similar requirements in the 2001 Municipal Permit are located in the City's "Storm Water Standards Manual" and this is the document that would be updated to address the requirements in the 2007 Municipal Permit. The regional name for regulations of this type is "Standard Urban Stormwater Mitigation Plan," or "SUSMP." The 2007 Municipal Permit also requires a second round of development and construction regulation updates, to be collaborated upon by all Copermitees via an update to the "Model SUSMP" prepared collectively by the Copermitees in 2002, with the updated Model SUSMP to be submitted to the San Diego Regional Water Quality Control Board by June, 2008. As an element of the Land Development Manual, these changes to the City's Storm Water Standards Manual will be approved administratively by the Development Services Department as a "Minor Amendment" because the changes respond to changes in state regulations.

The Storm Water Pollution Prevention Division has prepared and distributed the draft Storm Water Standards Manual for 30 day comment period from October 10 to November 10, 2007. Therefore, a complete summary of public comments was not possible as of the writing of this Report to Council (the processes used for public noticing and comment is detailed in Attachment 3). Stakeholder input received through early meetings has been used to guide the development of the draft document. The primary stakeholder comments received to date include:

1. The County's Low Impact Development Handbook which had been vetted through local technical experts should be incorporated within the City's standards.
2. The pollution control removal ratings of treatment control BMPs should not be developed locally; rather the California Stormwater Quality Association (CASQA) ratings should be used.
3. The establishment of a grading limitation to a maximum disturbed area should include flexibility based on site and project specifics.
4. The establishment of when a construction site is considered an exceptional threat to water quality, and thus require advanced treatment for sediment, should have provisions that allow the developer to reduce that level of threat through more extensive source control measures.

Storm Water Standards Manual updates proposed in response to the changes in the 2007 Municipal Permit are discussed below. The summaries below detail the requirements of the draft Storm Water Standards Manual dated October 10, 2007. The Storm Water Standards Manual may be changed as a result of public comment before being approved.

- Approval Criteria for All Projects. Whether ministerial or discretionary, all projects permitted since the adoption of the City’s Storm Water Standards Manual in 2002 have been required to implement Low Impact Development (“LID”) features (features which reduce the amount of storm water which leaves a site) “where feasible.” While the 2007 Municipal Permit language has remained relatively constant, language in the Storm Water Standards Manual has been revised to replace the phrase “are encouraged to” with the phrase “are required to.”

- Approval Criteria for Priority Development Projects (LID). The 2007 Municipal Permit refines the term “Priority Development Projects.” These projects are subject to additional development regulations and include: redevelopment projects that create or replace more than 5,000 square feet of impervious surface, housing units of 10 or more units, commercial and heavy industrial developments greater than one acre, automotive repair shops, restaurants, hillside development over 5,000 square feet, [some] developments within, adjacent to, or discharging directly into Water Quality Sensitive Areas, parking lots exposed to storm water and over 5,000 square feet or 15 parking spaces, new or improved streets/roads/highways/freeways over 5,000 square feet, and [some] retail gasoline outlets. These projects are required to 1) infiltrate runoff and construct low traffic areas with permeable surfaces. Staff proposes to implement this new requirement by offering project applicants two options: 1) infiltrate the runoff generated across the entire site by the 85th percentile storm or, 2) calculate and infiltrate the amount of water that can feasibly be infiltrated by landscaped areas. In either case, the term “infiltrate” is being defined as “directing runoff downwards towards the groundwater table or capturing runoff and using it for irrigation, and preventing runoff by a combination of topsoil infiltration and evapotranspiration.” A geotechnical study will be required to ensure that the amount of infiltration is appropriate for the soils, geologic conditions and proximity to structures.

- Approval Criteria for Priority Development Projects (Source Control). Priority Development Projects are required to include all of the following source control BMPs in project design: minimize pollutants of concern in runoff, sign or stencil storm drain inlets with educational messages about storm water pollution, properly design outdoor material and trash storage areas, efficient irrigation systems (this is already a City requirement), and other BMPs applicable to individual priority project categories.

- Approval Criteria for Priority Development Projects (Treatment Control). Priority Development Projects are required as necessary to result in overall site treatment (a component of which may be infiltration from the LID design features described above) of runoff up to the volume of runoff generated by a 24-hour, 85th percentile storm. Treatment BMPs must be ranked as having “high” or “medium” pollutant removal efficiency for all of the project’s most significant pollutants of concern unless treatment

BMPs with a low ranking are the only feasible BMPs. Staff proposes to use the California Storm Water Quality Association's ranking of BMPs, including the associated sizing and capacity assumptions.

- Approval Criteria for Priority Development Projects (Hydromodification). Similar to the above requirements, the 2007 Municipal Permit requires the City to unilaterally adopt new Hydromodification (erosion) control regulations to apply to Priority Development Projects over 50 acres in size within a year of the Permit's January 24, 2007 adoption date, and then to work collaboratively with the other Copermittees on regional standards. The goal of hydromodification regulations is to eliminate storm water flows from Priority Development Project sites which can cause downstream erosion. Therefore, post-development flows must mimic pre-development flows in terms of erosivity. To achieve this, post-development flows in excess of baseline flows may occur for a longer period of time at lower, non-erosive rates and volumes. In other words, Priority Development Projects subject to hydromodification requirements (e.g., those upstream of erodible areas) will need to store runoff on site and release it more slowly over a longer period of time. A consultant team hired by the County of San Diego under the Copermittee MOU, has expertise in geomorphology and predictive modeling and will be completing this work in October 2007, for incorporation into the City's draft Storm Water Standards Manual.
- Phased Grading. The 2007 Municipal Permit requires the City to establish grading limitations on the maximum area that can be disturbed at one time before temporary or permanent erosion controls are required. The Permit further allows the city to increase this limitation if the site has adequate erosion and sediment control practices implemented. Staff proposes to implement this provision by requiring an analysis of construction site soil erosion using the "Universal Soil Loss Equation," a model that is currently specified for use in the County of San Diego's Hydrology Manual. The maximum site area that can be disturbed at any one time would then be calculated using site-specific characteristics such that the modeled discharge of storm water does not exceed 30 mg/L of Total Suspended Solids, the same concentration that is used by the San Diego Regional Water Quality Control Board in its regulation of groundwater extraction. Applicants could propose to disturb larger areas of the site if they incorporate sediment and erosion controls as necessary so that the model continues to predict discharges of less than 30 mg/L of Total Suspended Solids.
- Advanced Treatment. The 2007 Municipal Permit requires the City to evaluate construction sites to determine if they are and "exceptional threat to water quality" and lists several factors (e.g., size, slope, proximity to and sensitivity of receiving waters, etc.) to be used in that determination. Sites determined to be exceptional threats to water quality must then be required to utilize "advanced treatment" for sediment in runoff, a process which flocculates sediment (a process of causing fine particles to stick together and form larger particles) and removes the flocculated sediment with filtration. Staff proposes two criteria for determining whether a construction site poses an exceptional threat: 1) if the site is over one acre and within, directly adjacent to, or directly discharging to a water body that is on the Clean Water Act Section 303(d) list as impaired

for sediment or turbidity; and 2) if the discharge from the site is expected to exceed 30 mg/L of Total Suspended Solids based on results from the Universal Soil Loss Equation. Size of graded area, slope, soil characteristics and types of construction BMPs are all input parameters for the Universal Soil Loss Equation model.

Watershed Urban Runoff Management Plans

Of the six watersheds the City's jurisdictional boundaries extend across, the City is the sole agency leading the Mission Bay & La Jolla Watershed Urban Runoff Management Plan (WURMP), and a participating agency with other jurisdictions in implementing WURMPs for the San Dieguito, Peñasquitos, San Diego River, San Diego Bay and Tijuana River watersheds. The purpose of the WURMPs is to identify the highest priority pollutant sources within each watershed and implement targeted activities to address those sources. In compliance with the 2007 Municipal Permit, the City has identified at least two watershed education activities and two water quality activities in each of the six WURMP Programs that must be implemented in each watershed in the City's jurisdiction each fiscal year. Although the City's final watershed education and water quality activities are included in the WURMPs, other components to the plans have not been completed to date and may not be completed prior to Council consideration because development of the WURMP Programs are coordinated efforts with other jurisdictions in each watershed. Therefore, the final Report to Council will include final drafts of the San Dieguito, Peñasquitos, San Diego River, San Diego Bay and Tijuana River WURMPs, with the City's final watershed education and water quality activities. Final versions of the WURMPs will be submitted to the Regional Board by January 24th, 2008.

Regional Urban Runoff Management Plan

The Regional Urban Runoff Management Plan (RURMP) serves as a framework to implement coordinated regional strategies across multiple jurisdictional boundaries. This Program requires cities to integrate activities at a regional scale when efficient and appropriate, such as water quality outreach campaigns. The County of San Diego is leading the development of this regional plan with input from the City and other jurisdictions. The RURMP has not been completed to date and may not be completed prior to Council consideration. However, the Storm Water Pollution Prevention Division will include a final and complete list of the City's proposed regional education activities along with the Copermittee's draft RURMP in the Request for Council Action. The final RURMP, and the list of City-sponsored activities, will be submitted to the Regional Board by January 24th, 2008.

FISCAL CONSIDERATIONS:

Funding for all Fiscal Year (FY) 2008 activities within the Jurisdictional, Watershed, and Regional URMPs is included in the City's budget. Actual implementation of FY 2009-2013 activities identified in all of the Urban Runoff Management Plans is dependent upon identification of funding in future yearly budgets and City Council approval. Potential alternative funding sources, including grants, to fund specific activities will be considered by separate action(s). City-wide costs for the programs are estimated at \$320,973,608 over the 5-year Municipal Permit cycle, as shown below.

Municipal Permit Year/ Budget Period¹	JURMP	WURMPs	RURMP
Fiscal Year 2008	\$36,000,000	\$6,000,000	\$100,000
Fiscal Year 2009	\$45,000,000	\$9,000,000	\$150,000
Fiscal Year 2010	\$45,000,000	\$9,000,000	\$150,000
Fiscal Year 2011	\$46,000,000	\$9,000,000	\$200,000
Fiscal Year 2012	\$47,000,000	\$9,000,000	\$200,000
Fiscal Year 2013	\$48,000,000	\$9,000,000	\$200,000
Total Program Costs:	\$267,000,000	\$51,000,000	\$1,000,000
Total City-Wide Costs:	\$319,000,000²		
¹ The 5-year 2007 Municipal Permit cycle extends over six fiscal years (January 24, 2008 to January 24, 2013). ² Actual implementation of the activities identified in the Urban Runoff Management Programs is dependent upon identification of funding in future yearly budgets and City Council approval. Only Street Division and Storm Water Pollution Prevention Division estimates are included; other department estimates are not included. Estimates include initial planning costs for TMDLs/ASBS regulations.			

PREVIOUS COUNCIL and/or COMMITTEE ACTION:

Resolution of the City Council approving the 2002 Jurisdictional Urban Runoff Management Plan (Resolution No. R-296019, January 28, 2002).

Ordinance of the City Council regarding prior amendments to the Storm Water Management and Discharge Control Ordinance (0-18975 N.S., September 10, 2001).

COMMUNITY PARTICIPATION AND PUBLIC OUTREACH EFFORTS:

The public participation and outreach efforts for the draft URMPs, including draft minimum BMPs for municipal, commercial/industrial, and residential sectors, included two public workshops, a 30-day public comment period, which included an internet comment form on the City's Think Blue website (www.thinkbluesd.org), and three presentations to the Public Utilities Advisory Commission's Storm Water Sub-Committee. The Storm Water Pollution Prevention Division notified the public of the availability of the draft documents and minimum BMPs through postcard mailings to stakeholders, newspaper notices, e-mail notices, notices on the City's Think Blue website, media releases sent to newspapers, and flyers distributed at city public involvement meetings. See Attachment 2 for details.

The Development Services Department's Environmental Analysis Section also requested public comment via a 30-day comment period on the draft Mitigated Negative Declaration (Project No. 134590) prepared under the California Environmental Quality Act. The Environmental Analysis Section has not completed a final Mitigated Negative Declaration as of the writing of this report.

KEY STAKEHOLDERS AND PROJECTED IMPACTS:

Key stakeholders include commercial businesses and industries, including the building industry, residential homeowners, citizens of the City of San Diego, other jurisdictions in the San Diego region, and environmental organizations.

The Development Services Department prepared a Mitigated Negative Declaration (Project No. 134590) which identified the following potential impacts under CEQA guidelines Section 15060(C)(2) and Section 15306: historical resources (archeology), paleontological resources, and land use (multiple habitat planning areas).

Mario X. Sierra, Director
General Services Department

R. F. Haas, Deputy Chief of Public Works

[Attachment 1: Proposed Minimum Required BMPS for Categories of Existing Development](#)

[Attachment 2: Summary of Public Outreach and Involvement Efforts for Proposed Minimum Required BMPs as of September 26, 2007](#)

[Attachment 3: Summary of Public Outreach and Involvement Efforts for Land Development Manual Updates as of September 26, 2007](#)