

4.0 DEVELOPMENT PLANNING COMPONENT

4.1 INTRODUCTION

Section 4.0 of this SWMP addresses requirements in sections of the Municipal Permit that the Authority has determined are relevant to the Development Planning Component. These sections are: D.1.a -f, D.1.h, D.2.a, D.5, I.1, J.1.a.(3)(c)i-viii, J.1.a.(3)(c)x, J.1.a.(3)(i), and J.1.a.(3)(l).

Municipal Permit Section D.1.a requires that the Authority revise the SWMP for the purpose of providing effective water quality and watershed protection principles and policies that direct land-use decisions, and requires the implementation of consistent water quality protection measures for Development Projects. Section 4.0 has been prepared to satisfy this requirement.

Municipal Permit Section D.1.b requires that the Authority revise their environmental review processes to accurately evaluate water quality impacts and identify appropriate measures to avoid, minimize, and mitigate those impacts for all Development Projects. Section 4.3 has been prepared to satisfy this requirement.

Municipal Permit Section D.1.c requires that the Authority include approval process criteria and requirements so Development Projects' discharges of pollutants from the MS4 will be reduced to the MEP, will not cause or contribute to a violation of water quality standards, and will comply with the Authority's ordinances, permits, plans, and requirements. The requirements shall include, but not be limited to: implementation of Source Control BMPs, Low Impact Development (LID) BMPs, buffer zones for natural water bodies, measures to reduce construction site discharge of pollutants from the MS4 to the MEP, and proof of a mechanism under which ongoing long-term maintenance of structural post-construction BMPs will be conducted. Section 4.2.3 has been prepared to satisfy this requirement.

Municipal Permit Section D.1.d requires that the Authority implement and update a Standard Urban Runoff Mitigation Plan (SUSMP) that will reduce Priority Development Project discharges of pollutants from the MS4 to the MEP, prevent Priority Development Project discharges from the MS4 from causing or contributing to a violation of water quality standards, and manage increases in runoff discharge rates and durations from Priority Development Projects that are likely to cause increased erosion of stream beds and banks, silt pollutant generation, or other impacts to beneficial uses and stream habitat due to increased erosive force. Priority Development Projects are defined in Municipal Permit Section D.1.d.(1) and categorized in Municipal Permit Section D.1.d.(2) which are included in Appendix A of this document. Appendix C has been prepared to satisfy this requirement.

Municipal Permit Section D.1.e requires that the Authority develop and utilize a watershed-based database to track and inventory approved treatment control BMPs and treatment control BMP inspection and maintenance, and implement a program to verify that treatment

control BMPs are operating effectively and have been adequately maintained. Section 4.4.4 has been prepared to satisfy this requirement.

Municipal Permit Section D.1.f requires that the Authority inspect constructed LID, source control, and/or treatment control BMPs, prior to occupancy of a Development Project, to verify they have been constructed in compliance with specifications, plans, permits, ordinances, and the Municipal Permit. Section 4.4.4 has been prepared to satisfy this requirement.

Municipal Permit Section D.1.h requires that the Authority enforce its stormwater ordinances for Development Projects to maintain compliance with the Municipal Permit. Ordinances shall include sanctions such as: non-monetary penalties, fines, bonding requirements, and/or permit or occupancy denials for non-compliance. Section 4.4.4 has been prepared to satisfy this requirement.

Municipal Permit Section D.2.a requires that the Authority update the grading ordinances and other ordinances as necessary to achieve full compliance with the Municipal Permit, including requirements for the implementation of all designated BMPs and other measures within 356 days of the adoption of the Municipal Permit. Prior to approval and issuance of local construction and grading permits, the Authority must: require all individual proposed construction sites to implement designated BMPs and other measures so that pollutants discharged from the site will be reduced to the maximum extent practicable and will not cause or contribute to a violation of a water quality standard; require and review the project proponent's stormwater management plan to verify compliance with their grading ordinance, other ordinances, and the Municipal Permit prior to permit issuance; and verify that project proponents subject to General Construction Permit have existing coverage under the General Construction Permit. Section 4.2.3 has been prepared to satisfy this requirement.

Municipal Permit Section D.5 requires that the Authority implement an education program using all media as appropriate to: 1) measurably increase the knowledge of the target communities regarding MS4s, impacts of urban runoff on receiving waters, and potential BMP solutions for the target audience; and 2) to measurably change the behavior of target communities and thereby reduce pollutant releases to MS4s and the environment. At a minimum, the education program shall meet the requirements of this section and address Municipal Departments and Personnel; Construction Site Owners and Developers; Industrial Owners and Operators; and Commercial Owners and Operators. Section 10.0 describes the Educational Component of the SWMP. This is briefly addressed in Sections 4.2.4 and 4.4.4.

Municipal Permit Section I.1 requires that the Authority annually assess and report the effectiveness of the Development Planning component of their SWMP addressing significant and/or types of activities/BMPs being implemented. Based on the results of the effectiveness assessment, the Authority is required to annually review its jurisdictional activities or BMPs to identify modifications and improvements needed to maximize SWMP effectiveness as they pertain to the Development Planning component. Section 4.5 has been prepared to address this requirement.

Municipal Permit Sections J.1.a.(3)(c)i-viii and J.1.a.(3)(c)x require that the Authority's Development Planning component of the SWMP be revised to include:

- 1 A description of the water quality and watershed protection principles that have been or will be included in the Copermittees General Plan, and a time schedule for when modifications are planned, if applicable. Section 4.0 has been prepared to satisfy this requirement.
- 2 A description of the Copermittees' current environmental review process and how it addresses impacts to water quality and appropriate mitigation measures. If the Copermittee plans to modify the process during the permit term, a time schedule for modifications shall be included. Section 4.3 has been prepared to satisfy this requirement.
- 3 A description of the development project approval process and requirements. Sections 4.2.3 and 4.4.4 have been prepared to satisfy this requirement.
- 4 An updated SUSMP document that meets the applicable requirements specified in sections D.1.d and D.1.g.(6), including a description of LID BMP requirements to be used prior to the Model SUSMP update. Appendix C has been prepared to satisfy this requirement.
- 5 A description of the database to be used to track and inventory approved treatment control BMPs and treatment control BMP maintenance. Sections 4.4.4 and 6.2 have been prepared to satisfy this requirement.
- 6 A completed watershed-based inventory of approved treatment control BMPs. Sections 4.4.4 and 6.2 have been prepared to satisfy this requirement.
- 7 A description of the program to be implemented to verify that approved treatment control BMPs are operating effectively and have been adequately maintained, including information on treatment control BMP inventory, prioritization, inspection, and annual verification. Sections 4.4.4 and 6.2 have been prepared to satisfy this requirement.
- 8 A description of inspections that will be conducted to verify BMPs have been constructed according to requirements. Sections 4.4.4 and 6.2 have been prepared to satisfy this requirement.
- 9 A description of enforcement mechanisms and how they will be used. Section 4.4.4 has been prepared to satisfy this requirement.

Municipal Permit Sections J.1.a.(3)(i) and J.1.a.(3)(l) describe the required updates and revisions to this SWMP as they pertain to the Educational and Effectiveness Assessment Components respectively.

Section 10.0 describes the Educational component of the SWMP and Section 13.0 describes the Effectiveness Assessment component of the SWMP. These requirements are briefly addressed in Sections 4.2.4, 4.4.4, and 4.5.

4.2 LAND USE PLANNING

4.2.1 BACKGROUND

The Authority became responsible for the planning and operations of the SAN on January 1, 2003, in accordance with the San Diego County Regional Airport Authority Act (SDCRAA Act). The SDCRAA Act grants the Authority all land use planning authority and jurisdiction over lands within the original SAN leasehold, along with any other lands that might be acquired adjacent to the existing airport property and necessary to operate the Airport.

The Authority has proposed a land use plan - more appropriately referred to as an Airport Master Plan (Master Plan) - for SAN that, when adopted, will be the document that formally defines the allowable land uses within SAN property. The proposed Master Plan is a policy document only. The proposed Master Plan is a figure that depicts the properties and boundaries under the planning jurisdiction of the Authority, and is a program level planning guide to ensure that Airport facilities are planned with thought and foresight to serve the greatest number of Airport users. The proposed Master Plan guides and groups similar Airport uses to ensure compatible, shared, and orderly development of Airport facilities within the limited physical space available for Airport purposes. All lands under the Authority's jurisdiction and in the proposed Master Plan are designated as airport land use and categorized as one of the following: Airfield, Terminal, Ground Transportation, or Airport Support. The land uses at SAN are also categorized as Municipal, Industrial, or Commercial to comply with the Municipal Permit and to be consistent with the previous SWMP and previous Annual Reports.

4.2.2 SOURCE CHARACTERIZATION

Pollutants typically found in SAN runoff include: sediment, nutrients (fertilizers), oxygen-demanding substances (for example, decaying vegetation), bacteria, heavy metals, synthetic organics (fuels, oils, solvents, lubricants), pesticides, and other toxic substances. The Authority recently implemented a source identification monitoring program according to its Sampling Plan (MACTEC, 2005b) in order to more thoroughly identify sources of pollutants of concern (POCs) at SAN.

Non-stormwater discharges also have the potential to degrade the quality of receiving waters - San Diego Bay. Dry weather flows conveyed by the stormwater conveyance system consist of flows from groundwater infiltration and accidental, improper, or illegal discharges to the stormwater conveyance system. Non-stormwater discharges have been addressed in Section 3.0 of this JURMP.

The Authority has developed a SUSMP based on the Model SUSMP developed by the Copermittees for projects that are determined to be Priority Development Projects. The Authority's SUSMP is included in Appendix C. The Authority's SUSMP describes procedures to identify pollutants and conditions of concern for each Priority Development Project. In order to properly classify pollutants of concern, each Priority Development Project must identify the receiving water that the project will discharge to, list any and all pollutants which the receiving water are impaired using the most recent Clean Water Act Section 303(d), and then compare the list of pollutants for which the receiving waters are impaired with the pollutants anticipated to be generated by the project. The Authority must also evaluate each Priority Development Project for conditions of concern (that is, conditions with the potential to permanently impact downstream channels and habitat integrity). The Authority may request a drainage report to include all or a subset of the following items to conduct their evaluation: the relevant hydrologic and environmental factors, geotechnical concerns and mitigation measures, a field reconnaissance to observe and report downstream conditions and the area's susceptibility to erosion or habitat alteration, and rainfall runoff characteristics from the project area developed for a two-year and 10-year frequency. The Authority's SUSMP is included in Appendix C. The categories of pollutants and conditions of concern are discussed in detail in Appendix C and a guide to identifying anticipated and potential pollutants generated by land use type is presented in Table 1 of Appendix C.

Descriptions of the pollutants, sources, and/or activities to be addressed through land use planning are further described in Sections 3.0 Non-Storm Water Discharges, 5.0 Construction Component, 6.0 Municipal Component, 7.0 Industrial and Commercial Component, and 9.0 Illicit Discharge Detection and Elimination Component.

4.2.3 BEST MANAGEMENT PRACTICE REQUIREMENTS

The Authority requires all projects to ensure that pollutant discharges and runoff flows from Development Projects are reduced to the MEP and that receiving water quality objectives are not violated throughout the life of the project. Priority Development Projects, as defined in Municipal Permit Section D.1.d.(1) and categorized in Municipal Permit Section D.1.d.(2), are further described in Appendix A of the Authority's SUSMP.

Development Projects at SAN are required to:

- Implement Source Control BMPs that reduce stormwater pollutants of concern in urban runoff, including storm drain system stenciling and signage, properly designed materials and trash storage areas, and efficient irrigation systems.
- Implement LID BMPs, where feasible, that maximize infiltration, provide retention, slow runoff, minimize impervious footprint, direct runoff from impervious areas into landscaping, and construct impervious surfaces to minimum widths necessary.
- Implement buffer zones for natural water bodies where feasible, or other buffers such as trees or access restrictions where buffer zones for natural water bodies are not feasible.

- Incorporated and implement BMPs required by the Authority's SUSMP as applicable for Priority Development Projects.
- Implement measures to reduce construction site discharges of pollutants from the storm drain system to the MEP and prevent construction site discharges from the storm drain system from causing or contributing to a violation of water quality standards.
- Provide proof that Development Projects subject to California's General NPDES Permit for Storm Water Discharges Associated with Construction Activities (aka General Construction Permit) have coverage under the existing General Construction Permit.
- For those structural post-construction BMPs which will not be maintained by the Authority, provide proof of a mechanism under which ongoing long-term maintenance of structural post-construction BMPs will be conducted.

4.2.4 PROGRAM IMPLEMENTATION

A Draft Master Plan for SAN was released for public review in September 2007. The Master Plan is an update to a previous land use plan that was prepared by the Port of San Diego in 2001 (at the time the Port of San Diego owned and operated the airport), but that was never adopted. Four key events necessitated preparation of the Master Plan, including the events of September 11, 2001, the transfer of ownership and operation of the airport from the Port of San Diego to the Authority in January 2003, the preparation of a new aviation activity forecast in 2004 analyzing future aviation activity and its impact on the San Diego Region through 2030, and the Airport Site Selection Program to study potential airport locations in the San Diego region to replace the existing SAN facility. The Master Plan documents the Authority's planning process for SAN and provides guidance for development of the airport to meet continued passenger, cargo, and operations growth at SAN. The goal of the Master Plan is: "to provide guidelines for future airport development which will satisfy aviation demand in a financially feasible manner, while at the same time resolving the aviation, environmental, and socioeconomic issues existing in the community." The Master Plan released to the public in September 2007 has yet to be adopted.

The Authority prepared the Phase I Airport Master Plan to guide the development of SAN to the year 2030. The proposed improvements in Phase 1 are:

- **10 new jet gates at Terminal 2** - The addition of 10 gates will accommodate the expected increase in travelers.
- **Additional parking for remain-over-night aircraft** - The additional parking for remain-over-night (RON) aircraft will increase the efficiency of airport operations by eliminating the need to taxi aircraft from one side of the runway to the other.

- **Second-level roadway at Terminal 2** - A second-level roadway will provide separate departure and arrival areas at Terminal 2 to relieve the current congestion associated with the dual arrival and departure location.
- **Parking structure** - A new structure will provide additional options for passengers and meeters/greeters to park their vehicles for short-term trips. The Draft EIR is evaluating an alternative with and without the parking structure.
- **Taxiway improvements on the north and south sides** - Taxiway improvements will increase the flow of aircraft traffic by efficiently lining up aircraft waiting to take off.

The Draft Environmental Impact Report (EIR) pertaining to the Phase I Master Plan was released on October 2, 2007. The EIR is a comprehensive study of all potential impacts on the environment resulting from proposed improvements to SAN and enhancements to travel experiences for San Diego County residents and visitors. It ensures that actions being taken are in the best interest of surrounding communities and the environment. The EIR covers potential impacts on aesthetics, air and water quality, archaeological and historical issues, impacts on endangered species, potential noise, the coastal zone, toxic and hazardous issues, and all cumulative effects to the environment as well. As part of the California Environmental Quality Act, the EIR is an objective, full-disclosure report meant to inform the public about any and all possible impacts to the environment and seek input on alternatives to reduce the impacts.

All Development Projects described in the Master Plan are subject to this SWMP. This SWMP requires that all Development Projects provide BMPs to minimize, to the MEP, impacts relative to construction, grading, and erosion and sedimentation. This SWMP includes the SAN SUSMP, which is provided in Appendix C.

Outreach and Staff Training

The Authority has developed internal and external education programs to educate the Authority staff, Authority boards, and tenants of water quality issues. The Authority's Education component is described in Section 10.0 of this document.

The Authority's education program ensures its planning and development review staffs have an understanding of federal, state, and local water quality laws and regulations applicable to Development Projects; the connection between land use decisions and short- and long-term water quality impacts; methods of minimizing impacts to receiving water quality resulting from development; and how to integrate LID BMP requirements into the Authority's land use planning program. The training is designed to present an understanding of relevant stormwater management topics, including:

- Determining methods to control downstream erosion impacts;

- Identifying pollutants of concern and appropriate treatment control BMPs for pollutants of concern;
- Implementing LID and Source Control BMPs.

4.3 ENVIRONMENTAL REVIEW PROCESS

The Authority has reviewed our current environmental review processes for all Development Projects to ensure: accurate evaluation of water quality impacts and cumulative impacts; identification of appropriate measures to avoid, minimize, and mitigate those impacts. Provided below is a description of our current environmental review process and how it addresses impacts to water quality and ensures appropriate mitigation measures.

To begin and as required by law, Authority staff use CEQA to evaluate projects for approval. The CEQA process begins with determining whether the act of project approval is "ministerial" or "discretionary". Ministerial project approval generally involves the use of fixed standards and objective measurements and precludes the imposition of project-specific conditions. Prior to issuing a discretionary approval, however, CEQA requires that the Authority first evaluate the effects of the proposed project on the environment. The Authority's approval to execute a development project is typically a discretionary act. The State of California, Governor's Office of Planning and Research (OPR) is responsible for carrying out various state-level environmental review activities pursuant to the CEQA, including the preparation of the state CEQA Guidelines (part of the California Code of Regulations) for implementation of CEQA. CEQA Guidelines Appendix G contains the "Environmental Checklist Form," which is a model checklist for use in determining whether the effects of a proposed project on the environment are significant. The Authority has adopted the checklist in CEQA Guidelines Appendix G as part of its environmental review process.

Authority planning and development review staff, in the Airport Planning Department, use the following questions from the "Environmental Checklist Form" pertaining to hydrology and water quality to evaluate the potential stormwater impacts of any particular project:

Would the Project:

- 1 Violate any water quality standards or waste discharge requirements?
- 2 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
- 3 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?

- 4** Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

These four standard questions are then routinely supplemented with 9 questions derived from the previous Municipal Permit (RWQCB Order 2001-01), specifically:

Would the Project:

- 1** Result in an increase in pollutant discharges to receiving waters, considering water quality parameters such as temperature, dissolved oxygen, turbidity, and other typical stormwater pollutants (heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment nutrients, oxygen-demanding substances, and trash)?
- 2** Result in significant alteration of receiving water quality during or following construction?
- 3** Result in increased impervious surfaces and associated increased runoff?
- 4** Create significant adverse environmental impact to drainage patterns due to changes in runoff flow rates or volumes?
- 5** Be a tributary to an already impaired water body as listed on the Clean Water Act Section 303(d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired?
- 6** Be a tributary to environmentally sensitive areas (for example, RARE, Areas of Special Biological Significance, etc.)? If so, can it exacerbate already existing sensitive conditions?
- 7** Have a potentially significant environmental impact on surface water quality to either marine, fresh, or wetland waters?
- 8** Have a potentially significant adverse impact on groundwater quality?
- 9** Cause or contribute to an exceedance of applicable surface water or groundwater receiving water quality objectives or degradation of beneficial uses?
- 10** Can the project impact aquatic, wetland, or riparian habitat?

4.4 DEVELOPMENT PROJECT APPROVAL AND VERIFICATION PROCESS

4.4.1 BACKGROUND

During the planning and review process and prior to project approval and/or permit issuance for all proposed Development Projects, the Authority prescribes the requirements necessary to ensure that discharges of pollutants from the project and to the storm drain system are prevented, eliminated, or reduced to the MEP; will not cause or contribute to a violation of water quality standards, and will comply with Authority's ordinances, and the Municipal Permit. The Authority's development review process incorporates appropriate stormwater management controls into standard conditions of approval, use permits, lease agreements, and other project approval mechanism as outlined below.

4.4.2 SOURCE CHARACTERIZATION

Descriptions of the pollutants, sources, and activities to be addressed through the Development Project approval process are described in Sections 3.0 Non-Stormwater Discharges, 5.0 Construction Component, 6.0 Municipal Component, 7.0 Industrial and Commercial Component, and 9.0 Illicit Discharge Detection and Elimination Component.

4.4.3 BEST MANAGEMENT PRACTICE REQUIREMENTS

The Authority has developed a SUSMP based on the Model SUSMP developed by the Copermittees for projects that are determined to be Priority Development Projects. The SUSMP process is an integral part of this SWMP. The Authority's SUSMP is included in Appendix C. Priority Development Projects are defined in Municipal Permit Section D.1.d.(1) and categorized in Municipal Permit Section D.1.d.(2). Priority Development Projects are required, to the MEP, minimize the introduction of pollutants of concern to the stormwater conveyance system that may result in significant impacts to the receiving water. This objective can be most effectively achieved through the use of a combination of Site Design, Source and Treatment Control BMPs. The Authority's SUSMP describes the selection and design criteria for the Source Control, LID, and Treatment Control BMPs to be implemented at Priority Development Projects. For Priority Development Projects, the Authority's SUSMP requires the selection of stormwater BMPs to maximize the removal of the primary pollutant(s) of concern identified on the project site. The SUSMP process will lead to the selection of Treatment Control BMPs with high or medium pollutant removal efficiencies for the most significant pollutants of concern. Matrices are provided in the Authority SUSMP to guide BMP selection, including Table 3, which depicts treatment control BMPs and their pollutant removal efficiencies. The project review and approval process is described in Section 4.4.4.

4.4.4 PROGRAM IMPLEMENTATION

All Development Projects at SAN undergo a review as part of the project review and approval process as described below and illustrated in Figures 10 (Tenant Projects) and Figure 11 (Capital Development Projects).

Tenant Projects

Whenever an airport tenant desires to make surface or subsurface improvements or perform new construction, reconstruction, modification, or demolition, the tenant must submit a request for approval through the Facilities Development Department which then, in turn, submits appropriate information to the Real Estate Management Department. The request must be accompanied by plans and specifications that indicate the nature and extent of the proposed work and conform to Authority policies and all relevant laws, ordinances, rules, and regulations. The plans may include references to specific sections or parts of the Uniform Building Code or other applicable codes, ordinances, or laws.

The Facilities Development Department, acting as project engineers, initiates the review process by completing a "Project Evaluation Form" (PEF). The PEF is then submitted to the Authority Environmental Affairs and Airport Planning Departments. Projects are evaluated by the two departments for environmental impacts as discussed in the following sections. The approval of an Airport tenant project becomes part of the lease or part of a use and occupancy permit. Any mitigation measures or conditions of approval required by the review process of these departments become part of the lease or use permit and may be adopted by the Airport Authority Board as a CEQA Mitigation Monitoring and Reporting Program.

Authority Projects

Whenever an Authority department desires to make surface or subsurface improvements or perform new construction, reconstruction, modification, or demolition, the project sponsor/proponent/manager must submit appropriate information to the Facilities Development Department. The Facilities Development Department staff complete the PEF for submittal to the Environmental Affairs and Airport Planning Departments. Projects are evaluated by the two departments for environmental impacts, as discussed in the following sections. Any mitigation measures or conditions of approval required by the review process of these departments become part of the project design and/or implementation and are formalized as a CEQA Mitigation Monitoring and Reporting Program adopted by the Board at the time of project approval.

Application of California Coastal Act

Discretionary projects proposed at SAN may require a coastal development permit in conformance with the California Coastal Act. Once the Authority determines that a project is a "development" and requires a coastal development permit, an application will be prepared and submitted to the California Coastal Commission. Under the California Coastal Act, "development" means, on land, in or under water, the placement or erection of any solid material or structure; discharge or disposal of any dredged material or of any gaseous, liquid, solid, or thermal waste; grading, removing, dredging, mining, or extraction of any materials; change in the density or intensity of use of land, change in the intensity of use of water, or of access thereto; construction, reconstruction, demolition, or alteration of the size of any structure, including any facility of any private, public, or municipal utility. As used in this section, "structure" includes, but is not limited to, any building, road, pipe, flume,

conduit, siphon, aqueduct, telephone line, and electrical power transmission and distribution line (California Public Resources Code §30106).

The California Coast Act contains water quality and watershed related policies with which a coastal development must comply. The Authority will propose project alternations or mitigation measures to be consistent with these policies for Development Projects that require a coastal development permit, which will then be reviewed and approved by the Coastal Commission.

The Authority's SUSMP describes the selection criteria, design criteria, and maintenance requirements for the Source Control, LID, and Treatment Control BMPs to be implemented at Priority Development Projects. The Authority's SUSMP also describes the criteria to control or maintain runoff discharge rates, durations, and velocities to reduce downstream erosion and protect stream habitat, the waiver provisions for meeting the numeric sizing criteria, and restrictions on use of infiltration BMPs to protect groundwater resources to meet the requirements in Municipal Permit Sections D.1.d.(10), D.1.d.(11), and D.1.d.(12). The Authority's SUSMP is included in Appendix C. Inspection, maintenance, and annual verification requirements are also described in Section 6.2 of this document.

The Authority's SUSMP is implemented by the Environmental Affairs Department. When the Environmental Affairs Department receives a PEF, it reviews it for hazardous materials and stormwater issues. Based on its review of the PEF, Environmental Affairs will determine if the project is subject to the SUSMP. Facilities Development will be advised of the necessity for the development of a Stormwater Mitigation Plan and will in turn notify the proponent of the project (either the tenant or appropriate Authority project sponsor/manager) if the project is subject to the SUSMP. Review and approval of the Stormwater Mitigation Plans will be conducted by Environmental Affairs. Incorporation of the elements of the Stormwater Mitigation Plans into the project design, CEQA Mitigation Monitoring and Reporting Program, lease, or other implementation mechanism will be the responsibility of Facilities Development and Airport Planning.

BMP Verification

Prior to occupancy of each Priority Development Project subject to SUSMP requirements, the Authority will develop an inspection schedule for each newly-constructed LID, source control, and treatment control BMP to verify that they have been constructed in compliance with all specifications, plans, permits, ordinances, and the Municipal Permit. This initial BMP verification inspection will be separate from the regular operation and maintenance inspections for each BMP.

Outreach and Staff Training

The Authority has developed internal and external education programs to educate the Authority staff, Authority boards, and tenants of water quality issues. The Authority's Education Component is described in Section 10.0 of this document.

The Authority's education program ensures its development review staffs have an understanding of federal, state, and local water quality laws and regulations applicable to Development Projects; the connection between project implementation decisions and short- and long-term water quality impacts; methods of minimizing impacts to receiving water quality resulting from development; and how to integrate BMP requirements into the Authority's development review programs. The training is designed to present an understanding of relevant stormwater management topics.

Enforcement of Development Sites

For details on enforcement procedures, see Section 2.4.

4.5 DEVELOPMENT PLANNING COMPONENT EFFECTIVENESS ASSESSMENT

The Authority has developed internal and external effectiveness assessment programs to evaluate the Authority staff, Authority boards, and tenant compliance with water quality issues. The Authority's Effectiveness Assessment component is described in Section 13.0 of this document.

4.6 PROGRAM REVIEW AND MODIFICATION

The Authority has reserved this section to identify and document future changes to the Development Planning Component of the SWMP. Section 14.0 of this SWMP details the program modifications made to the *SWMP January 2005-Revision* to bring this document into compliance with the renewed Municipal Permit.

