



**CITY OF ORANGE
LOCAL IMPLEMENTATION PLAN (LIP)**

**SECTION A-2
PROGRAM MANAGEMENT**



SECTION A-2, PROGRAM MANAGEMENT

A-2.0 PROGRAM MANAGEMENT

A-2.1 Introduction

Program management activities conducted by the City of Orange to implement the LIP involve the following activities:

- Coordination with the Principal Permittee and other Permittees on program development through the DAMP; common program implementation (such as monitoring, public education and watershed programs); fiscal resources for shared budgets under the Implementation Agreement; and overall program direction
- Coordination with internal City departments to implement the LIP
- Fiscal analysis in preparing, approving and tracking shared cost budgets prepared by the Principal Permittee and individual cost budgets prepared by the City
- Data management and compliance reporting based on common practices specified in the DAMP

This section addresses these issues.

A-2.2 Countywide Coordination

The City's implementation of the LIP and related DAMP programs is overseen by the Surface Water Quality Section within the Engineering Division of the Public Works Department. It is responsible for coordinating the development, implementation and administration of the storm water program for the city overall and responsible for LIP and DAMP development, implementation, compliance, fiscal analysis, and reporting.

In addition to managing internal implementation, the Surface Water Quality section also participates with the County of Orange, Orange County Flood Control District, and other Orange County cities in the countywide NDPES Storm Water Program as described in the DAMP and the following sections.

A-2.2.1 Agreement for Program Implementation

An Implementation Agreement among the 36 Permittees defines the roles, responsibilities, and cost sharing formulas governing the program. The City executed the updated cooperative agreement on June 25, 2002 (see **2003 DAMP Exhibit A- 2-I** for a copy of the Agreement).



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A-2.2.2 City Responsibilities

While the overriding City responsibility is to implement the LIP and related DAMP programs within the City's jurisdiction, other responsibilities include:

- Reviewing, approving and commenting on budgets, plans, strategies, management programs and monitoring programs developed by the Principal Permittee, sub-committees or task forces;
- Implementing the various storm water management programs as outlined in the Permit, the DAMP and the corresponding LIP within the City's jurisdiction to meet the MEP standard;
- Establishing and maintaining adequate legal authority;
- Coordinating among internal departments and agencies, as appropriate, to facilitate the implementation of the DAMP/LIP;
- Responding to/or arranging for response to emergency situations, such as accidental spills, leaks, illegal discharges/illicit connections, etc., to prevent or reduce the discharge of pollutants to the storm drain systems and waters of the U.S. within the City's jurisdiction;
- Pursuing enforcement actions as necessary to ensure compliance with the storm water management programs, ordinances and implementation plans, including physical elimination of undocumented connections and illicit discharges to drainage systems owned or controlled by the Permittees.
- Conducting storm drain inspections and maintenance in accordance with criteria developed by the Principal Permittee;
- Taking appropriate enforcement actions for illicit discharges to the MS4 system owned or controlled by the City;
- Conducting and coordinating with the Principal Permittee any surveys and characterizations needed to identify pollutant sources and drainage areas;
- Participating in the General Permittee meetings and any sub-committee/task force meetings as necessary;
- Submitting storm drain system maps, including any periodic revisions, with each annual report; and



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- Preparing and submitting all reports or requests of information to the Principal Permittee in a timely fashion.

Management of the countywide program is performed through a committee structure with responsibilities and chairing assigned selectively to the Principal Permittee and the Permittees. These committees are as follows:

- City Manager's Water Quality Committee: comprised of several City Managers, provides budget and overall program review and governance direction.
- City Engineer's Technical Advisory Committee: serves in a program advisory role to the Permittees and implements policy previously established by the Permittees. The TAC is comprised of a City Engineer, or selected representative, from a city in each of the five Orange County Supervisorial Districts and a representative from the County of Orange.
- Planning Director's Planning Advisory Committee - serves in a program advisory role to the Permittees regarding issues related to land development. The PAC is comprised of a Planning Director, or selected representative, from a city in each of the five Orange County Supervisorial Districts and a representative from the County of Orange
- Permittee Committee: provides a countywide forum to update designated representatives from each Permittee on program development.
- Sub-Committees/Task Forces:
 - Legal/Regulatory Authority Task Force
 - LIP/Pea Subcommittee
 - New Development Permittee Advisory Group (PAG)
 - Public Education Sub-Committee
 - Vector Control Task Force
 - Water Quality Monitoring & Science Task Force
 - Water Quality Ordinance Authorized Inspectors Sub-Committee

The City participates in these committees through the representatives shown in **Table A-2.1**:

Table A-2.1 - City of Orange Participation in Countywide Program

Committee / Task Force	City Department / Division
City Engineer's Technical Advisory Committee	Public Works/Engineering
Permittee Committee	Public Works / Engineering



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Committee / Task Force	City Department / Division
LIP/PEA Subcommittee	Public Works/Engineering
New Development Permittee Advisory Group	Public Works/Engineering
Authorized Inspectors Sub-Committee	Public Works/Engineering
Public Education	Public Works/Engineering
Vector Control	Public Works/Engineering
Water Quality Monitoring & Science Task Force	Public Works/Engineering



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A-2.3 City Internal Coordination - LIP

The responsibilities of the City departments for the internal coordination of LIP activities are shown in **Table A-2.2**.

Table A-2.2 – City of Orange Internal Implementation of the LIP

Program Element	Department/ Division	Activity	Responsibility Under the DAMP
Section A-2 - Program Management	Public Works/ Engineering	Serves as City LIP manager	Prepares annual compliance reports
	Public Works/ Engineering	Administration	Reviews shared budgets and prepared internal City budgets
	Public Works/ Engineering	Countywide coordination	Coordinates with Principal Permittee and other Permittees for development and implementation of countywide program through the DAMP
	Public Works/ Engineering	City coordination	Coordinates/ensures implementation of LIP by City departments; administers program
	Public Works/ Engineering	Contact with the public	Responds to phone, e-mail, and other input to the City on water quality issues and dispatches appropriate personnel; records responses
	Public Works/ Engineering	City compliance	Follows up on problems with City compliance
Section A-3 - Plan Development	Public Works/ Engineering	Oversees development of new DAMP programs	Coordinates between City departments and the Principal Permittee in the development of new programs and BMP effectiveness studies
Section A-4 - Legal Authority	City Attorney	Certification of adequate legal authority	Review of legal authority/ modification of ordinances/ legal certification



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Program Element	Department/ Division	Activity	Responsibility Under the DAMP
Section A-5 - Municipal Activities	Fixed Facilities		
	Public Works/ Maintenance & Water	Operates and maintains municipal water and waste facilities	Implements applicable BMPs, reports actions taken and modifications to LIP management
	Public Works/ Maintenance	Operates and maintains wastewater collection facilities	Implements applicable BMPs, reports actions taken and modifications to LIP management
	Public Works/ Maintenance & Water	Operates and maintains corporate/municipal yards	Implements applicable BMPs, reports actions taken and modifications to LIP management
	Public Works/ Maintenance; Community Services / Environmental	Operates and maintains parks, community centers, libraries and recreational facilities	Implements applicable BMPs, reports actions taken and modifications to LIP management
	Police	Operates and maintains police facilities	Implements applicable BMPs, reports actions taken and modifications to LIP management
	Fire	Operates and maintains fire stations	Implements applicable BMPs, reports actions taken and modifications to LIP management
	Public Works/ Maintenance; Community Services / Environmental	Operates and maintains public parking lots	Implements applicable BMPs, reports actions taken and modifications to LIP management
	All	Refer ordinance violations to LIP Management	Report violations of and/or enforce the water quality ordinance



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Program Element	Department/ Division	Activity	Responsibility Under the DAMP
Section A-5 - Municipal Activities (cont'd)	Field Programs		
	Finance; Public Works/ Maintenance & Water	Establishes and maintains contracts for select field program services	Implement mechanism for ensuring that contractors adhere to the DAMP and implement applicable BMPs
	Public Works/ Maintenance Community Services, Fire	Manages and implements IPM, pesticide and fertilizer programs	Implements applicable BMPs, reports actions taken and modifications to LIP management
	Community Services	Manages and implements landscape maintenance programs including lakes	Implements applicable BMPs, reports actions taken and modifications to LIP management
	Public Works/ Engineering	Plans, designs, and constructs projects related to roadway design & improvement	Implements applicable BMPs
	Public Works/ Maintenance	Manages and implements street sweeping program	Implements applicable BMPs
	Public Works/ Maintenance	Manages and implements waste recycling and litter control programs	Implements applicable BMPs
	Public Works/ Maintenance & Water	Operates and maintains municipal water and waste facilities	Implements applicable BMPs
	All	Refer ordinance violations to LIP Management	Report violations of and/or enforce the water quality ordinance



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Program Element	Department/ Division	Activity	Responsibility Under the DAMP
Section A-5 - Municipal Activities (cont'd)	Drainage Facilities		
	Public Works/ Engineering & Maintenance	Manages storm drain inventory/atlas	Updates or provides Geographic Information System (GIS) with storm drain information to LIP management
	Public Works/ Maintenance	Operates and maintains storm drains and flood control facilities	Implements applicable model BMPs, reports actions taken and modifications to LIP management
	Public Works/ Maintenance	Maintains catch basin & stenciling program	Maintains catch basins and implements stenciling program, reports actions taken and program modifications to LIP management
	All	Refer ordinance violations to LIP Management	Report violations of and/or enforce the water quality ordinance
Section A-6 - Public Education	Public Works/ Engineering	Manages education/ outreach program	Attends public meetings
	Public Works/ Engineering	Training	Provides training and guidance materials to private developers, public, and City staff
	Public Works/ Engineering	Coordination	Disseminates information in the City
	Public Works/ Engineering	Material development	Develops City versions of countywide education materials as appropriate
	Public Works/ Engineering	Event participation	Participates in one City event per year
	Public Works; Community Development; Community Services	Distribution of public education materials	Provides information to public at City counters and libraries
Section A-7 - New Development	Community Development/ Planning	Manages General Plan	Reviews the General Plan for water quality protection



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Program Element	Department/ Division	Activity	Responsibility Under the DAMP
Section A-7 - New Development (cont'd)	Community Development/ Planning	Manages environmental planning review	Implements CEQA checklist to review water quality issues on proposed projects
	Community Development/ Planning; Public Works/ Engineering	New development review	Reviews development for water quality issues
	Community Development/ Building; Public Works/ Engineering	Building/grading permit review	Advises applicants of water quality requirements
	Community Development/ Building; Public Works/ Engineering	Review of project documents	Verifies plan compliance with water quality requirements
	Community Development/ Building; Public Works/ Engineering	Water quality tracking	Coordinates for project tracking and inspection of water quality requirements
	Community Development/ Planning & Building; Public Works/ Engineering	Interacts with public	Provides information to permit applicants on water quality requirements
	Public Works/ Engineering	Review of public works projects	Verifies plan compliance with water quality requirements in public works projects
	Public Works/ Engineering	Water quality tracking of public projects	Coordinates for project tracking and inspection of water quality requirements in public works projects



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Program Element	Department/ Division	Activity	Responsibility Under the DAMP
Section A-8 - Construction	Community Development/ Building; Public Works/ Engineering	Building/ grading permit review	Advises applicants of water quality requirements
	Community Development/ Building; Public Works/ Engineering	Project document review	Verifies plan and NOI compliance with water quality requirements, reports actions taken to LIP management
	Community Development/ Building; Public Works/ Engineering	Manages oversight of construction inspection inventory, prioritization and inspection program	Inventories, prioritizes and maps construction sites
	Community Development/ Building; Public Works/ Engineering	Building/ grading permit inspection	Implement inspections, requires corrective actions to be taken, reports actions taken to LIP management
	Public Works/ Engineering	Public Works projects and Capital Improvement Project (CIP) project inspection	Verifies plan compliance with water quality requirements in public works projects and CIPs
	Public Works/ Engineering	Water quality tracking of public projects	Coordinates project tracking and inspection of water quality requirements in public works projects and CIPs, reports actions taken to LIP management
Section A-9 - Existing Development	Finance; Community Development; Public Works	Interact with businesses and the public	Provide general information to industrial and commercial businesses and the public regarding storm water management



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Program Element	Department/ Division	Activity	Responsibility Under the DAMP
	Finance/ General Revenue	Manage business license application process	Provides commercial and industrial information for the inventory to LIP management
	Public Works/ Engineering	Manage existing development program	Inventories, prioritizes and maps facilities
	Public Works/ Engineering;	Conduct inspections and enforcement activities for existing development sites	Implement inspections, require corrective actions to be taken, report actions taken to LIP Manager
	All	Refer ordinance violations to LIP management	Report violations of and/or enforce the water quality ordinance
Section A-10 – ID/IC	Public Works/ Engineering	Manages education/outreach program	Distribute public education materials to encourage the reporting of problems
	Public Works/ Engineering	Manage and implements the field programs	Report dumped materials and/or undocumented connections
	Public Works/ Engineering	Processes notifications/ response requests for water pollution problems	Detect and eliminate illegal discharges and illicit connections
	Public Works/ Engineering; Fire; Police	Responds to water pollution complaints	Respond to water pollution complaints in a timely manner and enforce all applicable ordinances
	Public Works/ Engineering	Implements construction site inspections	Reports violation of water quality ordinance
	Public Works/ Engineering	Implements existing development inspections	Reports violation and enforces water quality ordinance



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Program Element	Department/ Division	Activity	Responsibility Under the DAMP
	Public Works/ Engineering	Manage investigation, clean-up, reporting and enforcement for water pollution complaints	Respond to water pollution complaints in a timely manner and enforce all applicable ordinances
	City Attorney	Assists with the enforcement of applicable ordinance violations	Enforce against violators of storm water related ordinances
	Public Works/ Engineering	Manage water quality data received from countywide program	Initiate source investigations through ID/IC program for problems identified through the water quality monitoring program
Section A-11 - Water Quality Monitoring	Public Works/ Engineering	Assess water quality data received from countywide program	Assess data to determine need for follow up action identified through the water quality monitoring program
Section A-12 Watersheds	Public Works/ Engineering	Participates in watershed management activities	Represents City in IRWMP, TMDL, WMA, etc. activities

The names and contact information of the individuals responsible for carrying out the activities listed above for each department is attached at the end of this section as **Exhibit A-2-I**. This information can be used for all sections of this LIP where each department is referenced.



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A-2.4 Fiscal Analysis

Since the adoption of the permits, the City has provided funding for its share of the countywide shared-cost budget through the use of internal resources. The cost of City compliance for activities conducted annually continues to rise from \$1.6 million in 2004/05 with the implementation of the Third Term Permit programs to \$2.1 million in 2009/10. Costs continue to climb due to new or expanded program requirements and BMP implementation in various City programs. A detailed account of fiscal year expenditures will be reported in the annual progress reports.

The City uses the reporting format shown in **Tables A-2.3, A-2.4 and A-2.5** to report on capital, operations and maintenance and funding sources in the annual progress report. The City, in conjunction with the Principal Permittee and other Permittees, continues to re-evaluate the appropriateness of these data fields based on the following:

- Reporting procedures and needs at a countywide level
- Developing standard tracking tools forms for use by Permittees at a city or department level
- Developing standard tracking tools for individual elements of the LIP including personnel time and other expenditures
- Developing budgeting and future cost projection tools to complement existing city budget processes.

The City in conjunction with other Permittees will also continue to look at and evaluate new potential sources to fund the continuing expansion of new permit requirements. These efforts will be identified in the annual progress report.



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Table A-2.3 – Fiscal Analysis for City Capital Costs

(Land, Large Equipment and Structures)

LIP Program Elements	Current FY Costs	Next Year Projected FY Costs
Public Projects- BMPs		
Construction BMPs for Public Construction Projects		
Other Capital Projects/Major Equipment Purchases		
Totals		

The information above will be collected annually in Section C-2 of the DAMP Appendix C

Table A-2.4 – Fiscal Analysis for City Operations and Maintenance Costs

DAMP Program Elements	Current FY Costs	Next Year Projected FY Costs
Supportive of Program Administration (LIP Section 2.0)		
Plan Development (LIP Section 3.0)		
Municipal Activities (LIP Section 5.0) T&D/Litter Control		
Municipal Activities (LIP Section 5.0) Recycling		
Municipal Activities (LIP Section 5.0) Drainage Facility Maintenance		
Municipal Activities (LIP Section 5.0) Catch Basin Stenciling		
Municipal Activities (LIP Section 5.0) Street Sweeping		



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Municipal Activities (LIP Section 5.0) Environmental Performance (BMP Implementation)		
Municipal Activities (LIP Section 5.0) Public Property & Street Chemical Spill Response		
Municipal Activities (LIP Section 5.0) Pesticide & Fertilizer Management		
Public Information (LIP Section 6.0) Non-point Source Pollution Awareness		
Public Information (LIP Section 6.0) Household Hazardous Waste Collection		
Requiring New Development BMPs (LIP Section 7.0)		
Requiring Construction BMPs (Supportive of Plan Check & Inspection) (LIP Section 8.0)		
Existing Development (LIP Section 9.0) Industrial/Commercial		
Illicit Connections/Discharge Identification & Elimination (LIP Section 10.0) Facility Inspection		
Illicit Connections/Discharge Identification. & Elimination (LIP Section 10.0) Other Efforts to Identify & Eliminate Illicit Connections		
Contribution to regional program		
Totals		

The information above will be collected annually in Section C-2 of the DAMP Appendix C



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Table A-2.5 – Fiscal Analysis for City Funding Sources

DAMP FUNDING SOURCES	FUNDING PERCENTAGES	
	CURRENT FISCAL YEAR	Next FISCAL YEAR
GENERAL FUND	This information will be collected annually in Section C-2 of DAMP Appendix C	This information will be collected annually in Section C-2 of DAMP Appendix C
UTILITY TAX/CHARGES		
SEPARATE UTILITY BILLING ITEM		
GAS TAX		
SPECIAL DISTRICT FUND		
OTHERS (Specify) Sanitation Fee Benefit assessment Fleet Maintenance Fund Community Services District Water Fund Sewer & Storm Drain Maintenance Fee Grants		
TOTALS (must add up to 100%)		

A-2.5 Data Management and Reporting Requirements

The Permit requires the preparation of an Annual Progress Report for submittal to the Regional Boards and United States Environmental Protection Agency (USEPA) Region IX no later than November 15 of each year.

Appendix C of the DAMP now forms the reporting and program assessment component of the DAMP. The reporting format within Appendix C allows for an easier comparison of DAMP requirements to the City accomplishments. The City collects the following information:

- A program management and fiscal analysis report;
- A review of the status of program implementation and compliance with the permit;
- An assessment of the control measures established under the illegal discharge and illicit



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connection program and the DAMP;

- An assessment of compliance with the Receiving Water Limitations;
- An assessment of any storm water management program modifications made to reduce the discharge of pollutants to the maximum extent practicable (MEP);
- Major changes in any previously submitted plan/policies; and
- An overall program assessment that may be based on the California Stormwater Quality Association May 2007 guidance for assessing program activities at the various outcome levels or other methodology;

In addition to the Annual Progress Reports, the required submittals may also include any other requirements specified by the Regional Boards pursuant to permit conditions, California Water Code Section 13225 and 13267, or other regulatory provisions.

In preparing the annual progress reports, the City will continue to coordinate with the Principal Permittee and other Permittees in the development of common data management and tracking tools.

Exhibit A-2-I

NPDES Contact List

NPDES Program Contact List

July 2011

LIP Section	Responsibility	Department	Contact	Phone No.
A-2	Program Management/ Administration/Internal External Coordination/ Compliance/Public Contact	Public Works	Gene Estrada	714-744-5547
A-3	Plan Development	Public Works	Gene Estrada	714-744-5547
A-4	Legal Authority	City Attorney	David DeBerry	714-744-5580
A-5	Field Maintenance	Public Works/ Engineering/ Facility Inspection	Gene Estrada	714-744-5547
		Project Design	Majid Farhat	714-744-5562
		Storm Drain Maps	George Liang	714-744-5528
		Maintenance Div.	Jamie Herbon	714-532-6480
		Water Division	Rick Hurtado	714-288-2483
	Park Maintenance/	Community Services	Dan Robertson	714-744-7283
	Landscape/IPM	Community Services	Dan Robertson	714-744-7283
	Police Facilities	Police Dept.	Renee Nicholson	714-744-7341

NPDES Program Contact List

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	Fire Facilities/Compliance	Fire Dept./		
		NPDES	Patrick Dibb	714-288-2504
		Hazmat	Ed Engler	714-288-2550
A-6	Material Development/	Public Works	Gene Estrada	714-744-5547
	Event Outreach/Training/			
	Coordination			
A-7	General Plan	Community Development	Anna Pehoushek	714-744-7228
	Planning/Environmental Review	Community Development	Leslie Roseberry	714-744-7221
	Building Plan Review/Tracking	Community Development	David Khorram	714-744-7201
	Grading Plan Review/Tracking	Public Works	George Liang	714-744-5528
	New Development Review	Public Works	Gene Estrada	714-744-5547
	Public Projects Tracking	Public Works	Gene Estrada	714-744-5547
A-8	Grading Permit Review/Tracking	Public Works	George Liang	714-744-5528
	Grading Construction Inspection	Public Works	Majid Farhat	714-744-5562
	Public Project Design/Insp.	Public Works	Majid Farhat	714-744-5562
	Building Permit Review/Tracking	Community Development	David Khorram	714-744-7201
	Building Inspection	Community Development	David Khorram	714-744-7201

NPDES Program Contact List

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A-9	Business License	Finance	Leonie Crouch	714-744-2239
	Existing Development	Public Works	Gene Estrada	714-744-5547
	Inventory/Inspection/ Prioritization/Outreach			
A-10	Education/Outreach /	Public Works	Gene Estrada	714-744-5547
	Respond to Complaints/ Investigates Illegal Discharges/ Manage Data			
	Enforces violations	City Attorney	David DeBerry	714-744-5580
A-11	Assess Water Quality Data	Public Works	Gene Estrada	714-744-5547
A-12	Watershed Meetings/Activities	Public Works	Gene Estrada	714-744-5547