



**SAN DIEGO
COASTKEEPER®**

Agua Hedionda Watershed
Summer 2010 Stormwater Audit

August 2010

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Appendix A: Photos taken during Nursery Field Visits

Appendix B: Follow-up letters sent to nurseries

INTRODUCTION

San Diego Coastkeeper is the largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. Preventing polluted stormwater from entering storm drains, and ultimately our watersheds, is integral to protecting water quality in the region. As part of our efforts, we recently conducted a stormwater audit within the Agua Hedionda watershed. As you may recall, we sent a letter in June 2010 notifying each audited jurisdiction of our plan to conduct the audit focusing on nurseries within the Agua Hedionda watershed.

Why Agua Hedionda?

The Agua Hedionda hydrologic area is located with the larger Carlsbad watershed and is divided among five jurisdictions – the cities of Carlsbad, Oceanside, Vista, and San Marcos, and San Diego County. We selected the Agua Hedionda watershed for this summer's audit because the most recent Carlsbad Watershed Urban Runoff Management Program Annual Reports noted water quality issues in the Agua Hedionda hydrologic area and identified nurseries as a potential source of nitrate and impairment in the watershed. The reports suggested that by inspecting, educating, and requiring nurseries to implement Best Management Practices (BMPs) that “changes in knowledge, BMP implementation, and ultimately in discharge water quality will be evident.”¹

What does the audit involve?

Within each jurisdiction, our audit focused on a several areas:

1. Response to requests for public records and inspection reports related to the stormwater program;
2. Compliance of the jurisdiction's Urban Runoff Management Program (JURMP) commercial and industrial with Municipal Separate Storm Sewer System (MS4) permit requirements;
3. A review of inspection and enforcement documents for nurseries within the jurisdiction;
4. A July 20, 2010 site visit to some nurseries and plant distribution facilities in the area to ensure that nurseries were complying with any prior inspections, and were implementing Best Management Practices;
5. Following up site visits with letters to the facilities, and in one case directly reporting a violation to the jurisdiction.²

What does San Diego Coastkeeper hope to accomplish with the audit?

Through the audit, we aim to assess and compare the various stormwater programs for areas that discharge to the Agua Hedionda watershed. By comparing programs, we hope to reveal strengths and weaknesses of each jurisdictional program in the area in order to help the jurisdictions learn from each other and work together to protect and improve water quality in the Agua Hedionda watershed.

¹ Carlsbad WURMP Annual Report—January 2009 at 30.

² Letters sent to the individual facilities are attached to this report in Appendix B.

EXECUTIVE SUMMARY

San Diego Coastkeeper recognizes the hard work Carlsbad, Vista, Oceanside, San Marcos, and San Diego County are already doing to reduce storm water pollution in the Agua Hedionda Watershed. However, each jurisdiction has room for improvement.

Public Records:

Most jurisdictions were very responsive to San Diego Coastkeeper's public records requests. We commend those jurisdictions that provided documents electronically and those that waived fees. This improves transparency and encourages public review and oversight of the stormwater programs. Some jurisdictions provided documents that were not responsive to our request for inspection and enforcement records only in the Agua Hedionda hydrologic area. All jurisdictions should have their inspection and enforcement reports organized in a way that they can respond to watershed-specific records requests.

To further increase the public's ability to review each jurisdiction's stormwater work, we recommend that each jurisdiction post an electronic copy of the JURMP and all JURMP annual reports, either on the Project Clean Water website or on individual jurisdictions' web pages. Coastkeeper appreciated that San Diego County has its JURMP and FY 2006-07 and 2007-08 annual reports available on the Project Clean Water website, but with only a portion of the FY 2008-09 annual report available, the public still does not have easy access to the most up-to-date information about the County's stormwater work.

JURMP—Commercial and Industrial Inventories:

None of the jurisdictions reviewed³ was in strict compliance with the Municipal Separate Storm Sewer System (MS4) Permit's requirements related to commercial and industrial inventories. Each jurisdiction must ensure that its inventories include all the information required in MS4 Permit section D.3.b(1). San Diego Coastkeeper recommends that the Copermittees adopt a uniform inventory form that each jurisdiction uses that includes all the information the permit requires. Ideally, the inventories would also include whether a facility needs coverage under a general permit and the Water Discharge Identification numbers, where applicable.

JURMP—Non-filers

All jurisdictions need to improve their approach to non-filers. Some jurisdictions, like Carlsbad and Oceanside, do not include in their JURMP Annual Reports non-filer lists or a statement that no non-filers were found. Even those jurisdictions with comprehensive non-filer lists, like San Diego County, are taking a passive approach toward non-filers. The MS4 permit requires that "Each Copermittee **shall** require the use of pollution prevention methods by industrial and commercial sites/sources...."⁴ One pollution-prevention method for the facilities that present the highest threat to water quality is coverage under an individual or general permit along with development and implementation of a stormwater pollution prevention plan. Where a facility is required by law to be covered by a general permit but has not applied for or received coverage, that facility is not implementing all applicable Best Management Practices. Rather than merely informing the facility that it needs coverage and reporting the facility to the State or Regional Water Quality Control Board, each jurisdiction should be pursuing active enforcement action against the facility until it applies for and receives coverage or shows that it does not need coverage.

³ San Marcos' JURMP was not reviewed for compliance with the MS4 permit because San Diego Coastkeeper conducted a separate audit of San Marcos in January 2008.

⁴ See MS4 Permit at D.3.b(2)(a).

Nursery Inspections and Follow-Up

Each jurisdiction had varied approaches to inspections and follow-up. Most jurisdictions were inconsistent with follow-up after inspections. Some inspectors sent follow-up letters even when the facility had no violations, while other times a facility had several violations but there was no evidence that the facility either received a letter, a notice of violation, or a follow-up inspection. Likewise, some jurisdictions prioritized facilities for follow-up, but there were no clear criteria for what warranted high, medium, or low priority. San Diego Coastkeeper recommends that the Copermittees develop an inspection protocol with clear follow-up steps for each inspection depending on the inspection results, including when the jurisdictions will take various types of enforcement action. Follow-ups and enforcement actions should be done consistently, and all documentation should be publicly available and provided in response to records requests for inspection and enforcement documentation.

Coastkeeper's Nursery Field Visits

Our field visits of the nurseries revealed that many of the same violations occurred at multiple nurseries. Prominent violations included standing water, dirty loading docks, uncovered dumpsters, and exposed green waste. Our field visits showed that while the jurisdictions' efforts in inspecting, educating, and requiring nurseries to implement BMPs may have led to some "changes in knowledge [and] BMP implementation,"⁵ the nurseries in the Agua Hedionda watershed are not yet fully and consistently implementing all BMPs. However, conversations with nursery proprietors in San Diego County revealed that the County inspectors have a presence and influence the practices of nurseries within its jurisdiction. We encourage inspectors in all jurisdictions to work closely with nursery proprietors to continue to improve their BMP implementation. While it is yet to be seen whether the jurisdictions' focus on nursery inspection and BMP implementation will ultimately lead to improvements in water quality in the watershed, we encourage each jurisdiction to continue to regularly inspect its nurseries, work with proprietors to implement BMPs, and pursue aggressive enforcement efforts where necessary so that water quality in the watershed will improve.

⁵ Carlsbad WURMP Annual Report—January 2009 at 30.

I. CARLSBAD

a. Public Records

Generally, staff at Carlsbad's City Clerk's office was responsive to San Diego Coastkeeper's public records request for access to stormwater inspection reports and enforcement actions. The City Clerk's office requested clarification on two of the requests, invoked a 14-day time extension to respond to the request, and worked with Coastkeeper staff to arrange for a convenient time for Coastkeeper to review the documents. Once Coastkeeper had reviewed documents and indicated which documents we wanted copies of, Carlsbad promptly made the copies, charging Coastkeeper 15 cents a page for the records.

However, Carlsbad's response to Coastkeeper's public records request leaves much to be desired. First, Carlsbad attempted to charge Coastkeeper \$30 to obtain an electronic copy of Carlsbad's Jurisdictional Urban Runoff Management Program Annual Report for FY 2008-2009. When Coastkeeper asked for an accounting of how the actual costs to produce the CD added up to \$30, staff from the Carlsbad City Clerk's office responded that \$30 was the city's flat fee for all public records supplied on a CD. Coastkeeper followed up with a letter to the Carlsbad City Attorney's office, explaining how a flat fee for records on CD that does not correspond with the actual cost of record duplication violates the California Public Records Act and undermines the public's right to access such documents. The city attorney promptly responded, supplying Coastkeeper with a copy of the materials free of charge and pledging to look into Carlsbad's policy of charging \$30 for public records produced on CD. Coastkeeper expects Carlsbad will abandon the flat \$30 fee and charge only the direct cost of duplication for public records provided on CD, as the California Public Records Act requires.

The second area where Carlsbad's public records response fell short was Carlsbad's failure to provide Coastkeeper with only documents that were responsive to our public records request. Coastkeeper limited its public records request to inspection and enforcement documents for industrial and commercial sites located in the Agua Hedionda Hydrologic Area. Carlsbad's stormwater department produced all of Carlsbad's inspection and enforcement documents for industrial and commercial sites, not just those located in Agua Hedionda. This means either that the Carlsbad stormwater department does not have the capability to determine which inspections occurred in which hydrologic area or did not take the time to properly respond to the public records request. In either case, Carlsbad has room for improvement in organizing its inspection and enforcement documents and responding to public records requests.

Third, Carlsbad's method of responding to Coastkeeper's public records request discourages the public from requesting public records. Because Carlsbad failed to provide only inspection and enforcement documents from Agua Hedionda, there was a large box of documents that Carlsbad produced as "responsive" to Coastkeeper's request. Because it would have been prohibitively expensive to copy each of those documents, a Coastkeeper staff member drove to the City of Carlsbad's offices to review the documents and tab them for copying. The Coastkeeper staff member was escorted to a small conference room, given the large box of documents, and a Carlsbad staff member sat with her in the small room and watched her as she read through the documents over several hours. It was an extremely uncomfortable situation for the Coastkeeper staff member to be watched intently for several hours, and it was not an effective or efficient use of the Carlsbad staff member's time. Had Carlsbad provided only documents that responded to Coastkeeper's request, the situation could have been avoided. In situations where the amount of responsive documents requires a member of the public reviewing the documents at Carlsbad's

offices, Carlsbad should devise public records review process that is less intimidating for members of the public and does not waste a Carlsbad staff member's time.

b. JURMP

Coastkeeper examined Carlsbad's JURMP annual report for compliance with two aspects of the Municipal Separate Storm Sewer System Permit's (MS4 Permit, Order R9-2007-0001) requirements: (1) the industrial/commercial source inventory and (2) the list of industrial non-filers.⁶

1) *Industrial and Commercial Inventories*

The MS4 permit requires each Copermittee to annually update a "watershed-based inventory" of all industrial and commercial sites/sources within its jurisdiction that could contribute a significant pollutant load to the MS4. The permit specifies that the inventory must contain the following minimum information: name, address, pollutants generated by the site/source (and identification of whether the site/source is tributary to a Clean Water Act section 303(d) listed water body segment and generates pollutants for which the water body is impaired), and a narrative description including SIC codes which best reflects the principal products or services provided by each facility.⁷

The City of Carlsbad's JURMP annual report provided a combined industrial and commercial inventory list. It included the names, addresses, and a narrative description including SIC codes which best reflects the principal products or services provided by each facility. **The inventory failed to identify pollutants generated by the site/source or indicate whether the site/source is tributary to a Clean Water Act section 303(d) listed water body segment and generates pollutants for which the water body is impaired.**

2) *Non-filer List*

The MS4 Permit requires each city to include in its annual report a list of industrial non-filers, those "industrial sites, including the name, address, and [Standard Industrial Classification (SIC)] code, that may require coverage under the General Industrial Permit for which a [Notice of Intent] has not been filed."⁸ Carlsbad's Annual Report recognizes this requirement, and in Appendix 1.2 refers readers to Section 5.2.2 of the Annual Report for a "description of steps taken to identify non-filers and a list of non-filers (under the General Industrial Permit) identified by the copermittees." However, Coastkeeper was not able to locate anywhere in Section 5.2.2 where Carlsbad sets out its list of industrial non-filers or describes steps taken to identify non-filers nor a list of suspected non-filers. Instead, Section 5.2.2 describes efforts to classify new sources of stormwater pollution and means of registering new businesses.

When a Coastkeeper intern contacted Carlsbad to seek clarification about where in Carlsbad's annual report the industrial non-filer list was located, a City of Carlsbad employee claimed that the city was not responsible for including this information in the annual report.

c. Nurseries: Carlsbad's Inspections and Follow-up

⁶ See MS4 Permit at D.3.b(6).

⁷ See MS4 Permit at D.3.b(1).

⁸ See MS4 Permit at D.3.b(6).

1) Carlsbad's Inspections

Coastkeeper obtained records for inspections of six nurseries within Carlsbad. Because it is apparent that more than six nurseries exist within Carlsbad's jurisdiction, this indicates that either many Carlsbad nurseries went uninspected, or the records are incomplete. The six nurseries for which inspection documents were available include San Diego International Floral Trade Center, Plantplay, Oasis Nursery and Landscaping Inc., Armstrong Garden Centers, River Rey Farms, and Pacifica Flowers. Of these six nurseries, three reportedly had no violations. Five of the six nurseries were inspected more than once. Armstrong Garden Centers was the only nursery that was only visited once, and no violations were found during that inspection.

There seemed to be some inconsistency in the ways in which inspection reports were used, or violations noted. On two occasions (the 12/23/09 Pacifica Flowers inspection, and the 7/21/09 San Diego International Floral Trade Center inspection), the inspector checked "No Violations Noted." However, in both of those instances BMP Implementation and Compliance problems were observed, which called for specified Corrective Action. This is especially disconcerting, because San Diego International Floral Trade Center had fifteen separate BMP Implementation and Compliance categories that were noted as problematic. In addition to being concerning, this case also illustrates inconsistencies in Carlsbad's inspection process. Many of the same categories were noted in an inspection report for the previous year, and in that report violations were noted. It is, therefore, unclear from the inspection reports what the threshold for a violation is, or whether there is a consistent definition of a violation. Regardless, inspectors appeared diligent in at least noting all observed areas where BMPs were not sufficient.

2) Carlsbad's Follow-ups

Although available documents indicated that only six nurseries had been inspected in Carlsbad, Carlsbad followed up in some manner every time a violation was recorded at one of those nurseries. For this, Coastkeeper applauds Carlsbad. Means of follow-up varied, however, and it is difficult to glean a definitive follow-up protocol from the records we received. In fact, it appears there is no set protocol in place. Follow-ups ranged from verbal notice, to second inspections, to follow-up letters, to fines. As an illustration of the varied approach, San Diego International Floral Trade Center was cited and fined just four months after its first inspection and violation, and has thirteen actions (inspections, follow-ups) in the record. Rey River's record, on the other hand, shows a series of email correspondence negotiating the best time for the inspector to revisit the property, as well as multiple notices that written responses are due.

It may be – and seems quite likely – that Carlsbad also lacks a record-keeping protocol. In some cases, the City required written responses from violators, but no such responses exist in the record. In these cases, it is difficult to determine whether the violator in fact did submit a written response and it simply wasn't filed, or if the violator failed to comply with the City's request. The latter is a strong possibility, because in other cases the record contains all email correspondence between a nursery proprietor and an inspector.

d. Coastkeeper's Nursery Field Visits

San Diego Coastkeeper visited three nurseries in Carlsbad in the Agua Hedionda watershed: San Diego International Floral Trade Center, Plantplay, and Oasis Landscaping. Of the three nurseries visited, we are most concerned about San Diego International Floral Trade Center. At their site, Coastkeeper staff observed piles of trash stacked around the property, oil spills in the parking lot, and dumpsters

overflowing with garbage. Other observations we noted at their site included vehicles parked by storm drains with rear compartments hanging over drain, parking lot drainage leading straight to storm drains, exposed engine compartments of stored vehicles, and an algae bloom in storm channel. These observations are disconcerting, because exposed garbage, oil and mechanical equipment are likely to contaminate runoff water which enters storm drains and flows directly to our local beaches, bays, and oceans.

According to the documents we received in our public records requests, Carlsbad had inspected San Diego International Floral Trade Center multiple times, and issued a Notice of Violation, and then closed the case later. Carlsbad needs to pay much closer attention to nurseries like San Diego International Floral Trade that have potential to severely degrade our water quality. Additionally, Carlsbad needs to issue more Notices of Violation to discourage these repeated violations and bad management practices.

As for the other two nurseries that Coastkeeper interns visited in Carlsbad, Plantplay had no visible violations or areas of concern, and Oasis Landscaping had only mild issues—exposed piles of sediment and standing water from overwatering. We applaud these nurseries for their efforts to reduce contaminated runoff from their sites. We also appreciate any efforts that Carlsbad has undertaken to encourage local nurseries to implement Best Management Practices. Coastkeeper requests that Carlsbad and the nurseries within Carlsbad continue to prioritize, implement, and enforce these practices.

During Coastkeeper's nursery field visit, we observed a municipal playing field in Carlsbad, directly across from the City of Carlsbad's Farraday office building, where sprinklers had been left on. The playing field was flooding, and the excess irrigation water was running off the field and directly into the storm drain. Coastkeeper immediately called Carlsbad's stormwater hotline and spoke to a city employee about the violation. Later that day, a Carlsbad employee from the Water Conservation division called Coastkeeper back to thank us for spotting and reporting the violation. Carlsbad employees immediately fixed the problem (which was apparently a stuck valve) after it was reported, and the Carlsbad employee was appreciative of the report. Coastkeeper was pleased with Carlsbad's prompt response and immediate feedback on the overwatering issue.

e. Action Areas

Area	Problem	Severity	Fix
Public Records	Charge a flat \$30 fee for public records on CD	Violates California Public Records Act	Charge only direct cost of duplication for public records
Public Records	Provided documents that were not responsive to records request	Not strict compliance with California Public Records Act	Organize inspection and enforcement reports so that staff can easily identify the watershed on the report
Public Records	Intimidating public records review procedures	Discourages public records requests	Develop alternative procedure for public review of city documents
Industrial/ Commercial Inventory	Fails to identify pollutants	MS4 Permit Violation	Identify pollutants for each source
Industrial/ Commercial Inventory	Fails to identify if source tributary to 303(d) impaired water and source of pollutants for which water is impaired	MS4 Permit Violation	Identify sources tributary to 303(d) waters and if it is source of pollutants for which water is impaired
Industrial/ Commercial Inventory	Combines industrial and commercial list together	Inconvenient for public reviewers	Separate industrial and commercial sources into separate lists

Area	Problem	Severity	Fix
Industrial/ Commercial Inventory	Does not indicate whether industrial source is covered under a general permit	Inconvenient for public reviewers	Indicate on inventory whether each industrial site must be covered by general permit and include Waste Discharge ID number
Non-filer List	Not included in JURMP annual report	MS4 Permit Violation	Include in annual report non-filer list or statement that no non-filers were identified
Carlsbad nursery inspections	Only 6 nursery inspection reports provided: either not all inspection reports provided or not all nurseries inspected as reported in WURMP	Shows weakness in inspection recordkeeping	Devise a method (preferably electronic) to store and organize inspections and enforcement
Carlsbad nursery inspections	Follow-up method was not consistent	Indicates potential lack of inspection follow-up protocol	Adopt inspection follow-up guidelines and follow
Carlsbad nursery inspections	Written responses from violators not included in public records response	Indicates problems with enforcement record-keeping or potential lack of inspection follow-up protocol	Improve inspection and enforcement records filing system; adopt inspection follow-up guidelines and follow
Coastkeeper Nursery Field Visits	Obvious BMP violations at San Diego Floral Trade Center	Repeat violator suggests shows ineffectiveness of current enforcement methods	Ratchet up enforcement including harsher penalties and more frequent inspection for repeat violators

II. VISTA

a. Public Records

Coastkeeper commends Vista for its public records request response. Vista's City Clerk's office contacted Coastkeeper the day after receiving our public records request to inform us that Vista was working on the response. A few days later, Vista's Stormwater Program Manager, Paul Hartman, called Coastkeeper staff to better understand our public records needs so he could provide a tailored response to our request. In particular, Mr. Hartman focused on Coastkeeper's request for only inspections and enforcement actions in the Agua Hedionda watershed. He tailored the public records response and provided only documents relating to facilities in the Agua Hedionda watershed. Also, because Vista responded electronically, they did not charge Coastkeeper for our public records request. We sincerely appreciate that Vista provided these documents for free. We encourage Vista to continue its practice of providing free access to records, where feasible, and for other jurisdictions to follow suit.

Vista's documents were also the easiest for Coastkeeper staff to access and review of all the jurisdictions. Vista posted responsive documents in a folder on Vista's FTP server with requests broken down into organized subfolders by name of business, each with a helpful accompanying label. Coastkeeper appreciated that the records sought were electronic and easy accessible, as well as effectively organized. All inspection document fields were filled in by computer, making them easy to read. The only hiccup in Coastkeeper's public records request from Vista was that Coastkeeper staff did not immediately download the files and instead had planned to review them online, but the file was taken off the FTP server before Coastkeeper interns had reviewed them. However, Vista immediately re-posted the files once Coastkeeper contacted Vista and explained the situation.

Coastkeeper recommends that the other jurisdictions look to Vista as an example of how to efficiently and effectively provide the public with public records regarding their stormwater program.

b. JURMP

Coastkeeper examined Vista's JURMP annual report for compliance with two aspects of the MS4 permit's requirements: (1) the industrial/commercial source inventory and (2) the list of industrial non-filers.⁹

1) *Industrial and Commercial Inventories*

The MS4 permit requires each Copermittee to annually update a "watershed-based inventory" of all industrial and commercial sites/sources within its jurisdiction that could contribute a significant pollutant load to the MS4. The permit specifies that the inventory must contain the following minimum information: name, address, pollutants generated by the site/source (and identification of whether the site/source is tributary to a Clean Water Act section 303(d) listed water body segment and generates pollutants for which the water body is impaired), and a narrative description including SIC codes which best reflects the principal products or services provided by each facility.¹⁰

Vista's 2008 JURMP and JURMP Annual Report FY 2008-09, provided separate industrial and commercial inventory lists, which was helpful. The 2008 JURMP document included the names,

⁹ See MS4 Permit at D.3.b(6).

¹⁰ See MS4 Permit at D.3.b(1).

addresses, and a narrative description which best reflects the principal products or services provided by each facility. The 2008 JURMP provided NAICS codes instead of SIC codes, but the JURMP Annual Report provided SIC codes in the industrial and commercial inventories. The 2008 JURMP included the code for the hydrologic unit in which the source was located, and also included a Waste Discharger ID Number, which was helpful. **Neither the industrial or commercial inventory in the 2008 JURMP of the JURMP Annual Report FY 2008-09 identified pollutants generated by the site/source or indicated whether the site/source is tributary to a Clean Water Act section 303(d) listed water body segment and generates pollutants for which the water body is impaired.**

However, the municipal inventory in the JURMP Annual Report FY 2008-09 identified the pollutant-generating activities, the pollutants generated, and whether or not the source is tributary to a 303(d) listed waterway. It was unclear why the municipal inventory included all the required information but the commercial and industrial inventories did not.

2) Non-filer List

The MS4 permit requires each city to include in its annual report a list of industrial non-filers, those “industrial sites, including the name, address, and [Standard Industrial Classification (SIC)] code, that may require coverage under the General Industrial Permit for which a [Notice of Intent] has not been filed.”¹¹ Vista’s JURMP Annual Report FY 2008-09 recognizes this requirement, and in Table 5.1 refers readers to Section 5.2.4.3 of the Annual Report for a “description of steps taken to identify non-filers and a list of non-filers (under the General Industrial Permit) identified by the copermittees.”¹²

Vista’s JURMP Annual Report 2008-09 does not have a section numbered “5.2.4.3.” The annual report narrative appeared to contain the required information, explaining in section 5.2.4.2. that nine facilities were found to require coverage under the Industrial Permit, but had not yet filed a Notice of Intent.¹³ The annual report also included a Table 5.3, labeled “General Industrial Permit Compliance Status.” Therefore, while it appears Vista has complied with the MS4 permit requirements related to non-filers, the annual report contained errors that made it difficult for Coastkeeper staff members to confirm Vista’s compliance with the non-filer requirement. We suggest that Vista ensure that future annual reports contain correct section cross-references in the document so that the public may confirm Vista’s compliance with MS4 permit requirements.

c. Nurseries: Vista’s Inspections and Follow-up

1) Vista’s Inspections

Vista easily stands out above the other jurisdictions as exemplary in terms of its nursery inspections. Vista’s documentation was commendable: it was all electronic, and well-organized. The inspectors were thorough in their inspections and did a good job classifying priority levels for follow-up inspections. Each nursery that was inspected was marked as either priority 1, 2, or 3 for follow-ups. Priority 1 nurseries were those nurseries for which follow-ups were a very high priority. For priority 2 nurseries, follow-up visits were considered medium priorities, and for priority 3 nurseries, follow-ups were of low priority. Overall, Coastkeeper is impressed with Vista’s nursery inspections.

¹¹ See MS4 Permit at D.3.b(6).

¹² See Vista JURMP Annual Report 2008-09 at 5-2.

¹³ See Vista JURMP Annual Report 2008-09 at 5-6.

2) Vista's Follow-ups

All nurseries needing follow-ups had them, and follow-up reports were accompanied by excellent photographic documentation. Even more, Vista has shown itself to be persistent and consistent with follow-ups, and has acted quickly; all follow-ups took place within or around 1 month following the original inspection. Further, Vista's system for categorizing priority levels for follow-up inspections on a scale from 1-3 was helpful in explaining why certain nurseries had received follow-up inspections and others had not. The only nurseries that did not have follow-ups were ones classified as low priority, which Coastkeeper considers an acceptable rate of follow-ups.

d. Coastkeeper's Nursery Field Visits

While visiting nurseries in Vista, Coastkeeper noticed that many of the same violations occurred at multiple nurseries. Prominent violations included standing water, dirty loading docks, uncovered dumpsters, and exposed green waste. Coastkeeper specifically noted that Francis Biddle International had a very large dumpster nearly filled with green waste that was uncovered. Also at that site, we observed large amounts of standing water and piles of exposed pots. Fiesta Flowers was also a site of concern, because at that location we observed a substance which had spilled in the parking lot and did not appear to have been properly cleaned. We also noticed that there were uncovered dumpsters and standing water in their parking lot. It is important to note, however, that Fiesta Flowers appeared to share their building and parking lot with other businesses, and it was not clear which business was to blame. Coastkeeper informed Fiesta Flowers of these concerns, and understands that they may not be the party responsible for these violations.

e. Action Areas

Area	Problem	Severity	Fix
Industrial & Commercial Inventories	Fails to identify pollutants	MS4 Permit Violation	Identify pollutants for each source
Industrial & Commercial Inventories	Fails to identify if source tributary to 303(d) impaired water and source of pollutants for which water is impaired	MS4 Permit Violation	Identify sources tributary to 303(d) waters and if it is source of pollutants for which water is impaired
Industrial & Commercial Inventories	Uses NAICS code in 2008 JURMP instead of SIC code	Permit Violation, but corrected in Annual Report 2008-09	Ensure future JURMPs and annual reports use SIC
Non-filer List	JURMP annual report refers to section 5.2.4.3 for non-filers, but such section does not exist. The material is in section 5.2.4.2 instead.	Confusing for public reviewers	Ensure annual report compliance chart references proper section in which non-filer information is included
Coastkeeper Nursery Field Visits	BMP violations at Francis Biddle International and Fiesta Flowers	Repeat violators suggests shows ineffectiveness of current enforcement methods	Continue to issue notices of violation and more frequently inspect repeat violators

III. OCEANSIDE

a. Public Records

Oceanside's City Clerk's office responded promptly to San Diego Coastkeeper's public records request, providing responsive documents more quickly than any other jurisdiction. Oceanside charged Coastkeeper 10 cents a page for black and white copies and 50 cents a page for color copies of their public records. While the inspection and enforcement reports themselves do not indicate in which watershed the facility is located, Oceanside nevertheless provided a tailored response that appeared to include only inspection and enforcement materials for Agua Hedionda watershed. Our initial public records request produced no inspection or enforcement reports for nurseries in Oceanside in the Agua Hedionda watershed.

To confirm that Oceanside has no nurseries in the Agua Hedionda watershed, on June 30, 2010, Coastkeeper sent a second request for documents, specifically seeking nursery inspection and enforcement documents for Agua Hedionda. On July 6, Oceanside responded that "[a]ccording to the Water Utilities Department staff, the City of Oceanside has no nursery facilities in the Agua Hedionda hydrologic area.

b. JURMP

Coastkeeper examined Oceanside's JURMP annual report for compliance with two aspects of the MS4 permit's requirements: (1) the industrial/commercial source inventory and (2) the list of industrial non-filers.¹⁴

1) *Industrial and Commercial Inventories*

The MS4 permit requires each Copermittee to annually update a "watershed-based inventory" of all industrial and commercial sites/sources within its jurisdiction that could contribute a significant pollutant load to the MS4. The permit specifies that the inventory must contain the following minimum information: name, address, pollutants generated by the site/source (and identification of whether the site/source is tributary to a Clean Water Act section 303(d) listed water body segment and generates pollutants for which the water body is impaired), and a narrative description including SIC codes which best reflects the principal products or services provided by each facility.¹⁵

Oceanside's 2008 JURMP and JURMP Annual Report FY 2008-09 provided separate industrial and commercial inventory lists, which was helpful. The 2008 JURMP commercial and industrial inventories include "name, address, Standard Industrial Classification (SIC) code, watershed, a category designation that describes the products or services provided by each site or source, and whether the business is home based and/or mobile."¹⁶ The 2008 JURMP inventories did not include "pollutants generated by the site/source or indicated whether the site/source is tributary to a Clean Water Act section 303(d) listed water body segment and generates pollutants for which the water body is impaired." **The combined industrial/commercial inventory in Oceanside's JURMP Annual Report 2008-09 included columns labeled "potential pollutants" and "Tributary to 303(d) listed" but these columns were left blank.**

¹⁴ See MS4 Permit at D.3.b(6).

¹⁵ See MS4 Permit at D.3.b(1).

¹⁶ See City of Oceanside 2008 JURMP at 7-3; Tbls. B.4, B.5.

By leaving these columns blank, Oceanside failed to comply with the MS4 permit's inventory requirements.

Coastkeeper found several inconsistencies in Oceanside's inventories provided in the 2008 JURMP and JURMP Annual Report 2008-09. The 2008 JURMP Industrial Facility inventory listed some facilities, like Waste Management of No. Co. and Federal Heath Sign Co, as "high" threat to water quality with a Waste Discharger ID number, but the same facilities on the JURMP Annual Report 2008-09 inventory were listed as a "low" threat to water quality, had no category description, and no Waste Discharger ID. Likewise, Hobie Cat Company is listed on the 2008 JURMP Industrial Facility inventory as "high" threat to water quality boat repair facility with a Waste Discharger ID number, but the same facility on the JURMP Annual Report 2008-09 inventory was listed as a recreational vehicle facility with a "medium" threat to water quality and no Waste Discharger ID. The Annual Report provided no explanation as to why these facilities were "recategorized" leaving Coastkeeper to wonder which document is incorrect.

The JURMP Annual Report 2008-09 inventory failed to include a description of principal products/services for several facilities and did not include all the Waste Discharger ID numbers included in the 2008 JURMP inventory lists. The Annual Report inventory also inconsistently categorized groups of facilities; some sheet metal manufacturers, like Unique Metal Fabrication and Nelgo Industries, were categorized as industrial facilities, but another sheet metal manufacturer, K-Fab, was listed as a commercial facility.

2) Non-filer List

The MS4 permit requires each city to include in its annual report a list of industrial non-filers, those "industrial sites, including the name, address, and [Standard Industrial Classification (SIC)] code, that may require coverage under the General Industrial Permit for which a [Notice of Intent] has not been filed."¹⁷ Copermittees must also describe steps taken to identify non-filers.¹⁸ Oceanside's JURMP Annual Report FY 2008-09 recognizes this requirement, and in Table 5.1 refers readers to Section 5.2.4.1 and 5.2.4.2 of the Annual Report for a "description of steps taken to identify non-filers and a list of non-filers (under the General Industrial Permit) identified by the copermittees."¹⁹

Neither section 5.2.4.1. nor section 5.2.4.2. of Oceanside's JURMP Annual Report 2008-09 contains a non-filer list or a description of steps taken to identify non-filers. Section 7.2.4.3 contains a section titled "Identification of Industrial Non-filers" that described Oceanside's steps to identify non-filers, but did not include a list of non-filers or a statement that no non-filers were found. We suggest that Oceanside ensure that future annual reports contain correct section cross-references in the document so that the public may confirm Oceanside's compliance with MS4 permit requirements.

We appreciate that Oceanside "created a Non-filer checklist and flow chart for reference by inspectors to convey to industrial businesses what qualifies as a non-filer and how to submit to the SWRCB non-filer applications."²⁰ But we were disappointed that Oceanside's new policy on non-filers is to notify Regional Board staff in the next annual report.²¹ An industrial facility that needs coverage under a general permit but lacks that coverage is not complying with Best Management Practices; they are without a stormwater pollution prevention plan and may be failing to implement other Best Management Practices. Because

¹⁷ See MS4 Permit at D.3.b(6).

¹⁸ See MS4 Permit at J.3.a.(3)(d).xi

¹⁹ See Oceanside JURMP Annual Report 2008-09 at 5-1.

²⁰ See Oceanside JURMP Annual Report 2008-09 at 5-1.

²¹ See *id.* at 14-5.

these facilities are not implementing Best Management Practices, Oceanside must work with the facility to ensure they implement a stormwater pollution prevention plan and apply for and receive coverage under a general permit. Oceanside's decision to merely report these facilities to the Regional Board once a year turns a blind eye to the MS4 permit requirement that "Each Copermittee **shall** require the use of pollution prevention methods by industrial and commercial sites/sources...."²²

c. Nurseries: Oceanside's Inspections and Follow-up

Oceanside had no inspection reports for nurseries in the Agua Hedionda watershed.

d. Coastkeeper's Nursery Field Visits

San Diego Coastkeeper did not visit any nurseries in Oceanside located in the Agua Hedionda watershed.

e. Action Areas

Area	Problem	Severity	Fix
Industrial & Commercial Inventory	Fails to identify pollutants	MS4 Permit Violation	Identify pollutants for each source
Industrial & Commercial Inventory	Fails to identify if source tributary to 303(d) impaired water and source of pollutants for which water is impaired	MS4 Permit Violation	Identify sources tributary to 303(d) waters and if it is source of pollutants for which water is impaired
Industrial & Commercial Inventory	Fails to include a narrative description of principal products and services for some facilities	MS4 Permit Violation	Include narrative description of principal products and services for all industrial and commercial facilities
Industrial & Commercial Inventory	Change in facility description and threat to water quality between 2008 JURMP and Annual Report 2008-09	Unclear whether one report contains errors or if several facilities have undergone changes in one year	Provide a clear explanation for any actual changes; find changes and fix any errors in Annual Report inventory
Industrial & Commercial Inventory	Inconsistently characterize/mischaracterize facilities, like sheet metal manufacturing,	Potential MS4 Violation because inventory must correctly characterize each facility	Find inconsistencies and fix errors; ensure all industrial facilities are listed as industrial
Industrial & Commercial Inventory	Does not include all Waste Discharger ID in Annual Report 2008-09	Misleads public by including some, but not all, Waste Discharge ID numbers for facilities that have them	Include all Waste Discharger ID numbers in Annual Report 2008-09 inventory
Non-filers	Annual Report refers to section 5.2.4.1 and 5.2.4.2 for non-filers, but the material is in section 7.2.4.3 instead.	Confusing for public reviewers	Ensure annual report compliance chart references proper section in which non-filer information is included
Non-filers	Annual Report does not include list of non-filers or statement that none exist	MS4 Permit Violation	Include non-filer list or statement that none exist

²² See MS4 Permit at D.3.b(2)(a).

Area	Problem	Severity	Fix
Non-filers	Oceanside plans to report non-filers to Regional Board once per year but take no other action	MS4 Permit Violation	Non-filers are not implementing all necessary BMPs because they are not covered by a general permit. Oceanside should use enforcement action against non-filers to ensure they develop and implement a SWPPP and implement all applicable BMPs

IV. SAN MARCOS

a. Public Records

Coastkeeper appreciated that the documents produced by San Marcos in response to our public records request were provided free of charge in electronic form and that they were organized by location. Instead of providing all documents in a single electronic file, it would have been helpful if the responses to the public records request be organized by creating different folders of PDF files that reflect order by location, time, and other distinguishing factors.

The inspection documents, however, were not wholly responsive to our request because some documents included inspections from the wrong watershed. We requested information regarding inspections at all nurseries within the Agua Hedionda watershed, and we received information regarding some nurseries within the San Marcos Creek watershed as well. Coastkeeper also received information regarding applications for grade permits which does not appear to be responsive to our request for industrial and commercial inspections and enforcement actions. Further, some parts of the requested documents were missing. For example, San Marcos staff noted for us, "after diligent search, city cannot locate [Notices of Violations]." San Marcos should be able to account for their Notices of Violation.

San Marcos can further streamline archives so that documents are not duplicative. For some inspections, there were two documents produced—both contained the same information, but one was electronic and the other was a photocopy of the original. It would be more efficient to only include the electronic version, since it would provide the same information in a format that is easier to read and sort.

b. JURMP

Coastkeeper did not review San Marcos' JURMP because San Marcos was the subject of a separate Coastkeeper audit in January 2008.

c. Nurseries: San Marcos' Inspections and Follow-up

1) *San Marcos' Inspections*

San Marcos' nursery inspections were adequate but not exemplary. Bad handwriting was difficult to read and some inspectors ignored boxes or failed to fill in other information in the documents. Like Vista, San Marcos has a 1-3 prioritization system in place for follow-ups. However, Coastkeeper was disappointed at how nurseries were being prioritized. For example, after an inspection where multiple violations were found, a nursery was only classified as a 2, medium priority for a follow-up inspection, as opposed to a 1, high priority for a follow-up inspection.

2) *San Marcos' Follow-ups*

Significant improvement is needed in this area; Coastkeeper was unable to find documentation for any effective follow-ups. This is especially disconcerting in cases involving nurseries with multiple violations.

d. Coastkeeper's Nursery Field Visits

Nurseries in San Marcos were not visited, because Coastkeeper received their documents after our inspection date.

e. Action Areas

Area	Problem	Severity	Fix
Public Records	Provided documents that were not responsive to records request	Not strict compliance with California Public Records Act	Organize inspection and enforcement reports so that staff can easily identify the watershed on the report
Public Records	San Marcos was unable to provide copies of Notices of Violation	Indicates either problems with record-keeping or that San Marcos does not issue Notices of Violation as an enforcement tool	Ensure proper record-keeping of Notices of Violation; issue Notices where appropriate for repeat violators
San Marcos nursery inspections	Inspection reports not filled in completely and neatly	Indicates potential lack of thorough inspections; inhibits public oversight of inspections	Fill all inspection reports completely and with neat handwriting; institute electronic inspection reports if feasible
San Marcos nursery inspections	Priority system for classifying inspection follow-up does not provide for prioritized follow-up even where multiple violations	Indicates San Marcos not following up with facilities that had multiple violations	Adopt inspection follow-up guidelines and follow
San Marcos nursery inspections	No documentation of follow-up inspections	Indicates lack of follow-up where inspection indicated violations	Adopt inspection follow-up guidelines and follow, especially where multiple violations

V. SAN DIEGO COUNTY

a. Public Records

San Diego County responded to Coastkeeper's public records request in a timely manner. The County immediately reached out to Coastkeeper staff to determine Coastkeeper's record needs and to provide a workable timeline in which the County could produce the documents. When the County encountered a delay in being able to provide the records by the time initially indicated, they contacted Coastkeeper to inform us of the delay and to provide an alternate date when the records would be ready. San Diego County produced the public records on CD and did not charge Coastkeeper for the records.

b. JURMP

Coastkeeper examined San Diego County's JURMP materials available online at Project Clean Water for compliance with two aspects of the MS4 permit's requirements: (1) the industrial/commercial source inventory and (2) the list of industrial non-filers.²³

1) *Industrial and Commercial Inventories*

The MS4 permit requires each Copermittee to annually update a "watershed-based inventory" of all industrial and commercial sites/sources within its jurisdiction that could contribute a significant pollutant load to the MS4. The permit specifies that the inventory must contain the following minimum information: name, address, pollutants generated by the site/source (and identification of whether the site/source is tributary to a Clean Water Act section 303(d) listed water body segment and generates pollutants for which the water body is impaired), and a narrative description including SIC codes which best reflects the principal products or services provided by each facility.²⁴

San Diego County's inventories in the JURMP were provided in three separate lists: an agricultural facility inventory,²⁵ a commercial facility inventory,²⁶ and an industrial facility inventory.²⁷ Each inventory includes the facility name, address, hydrologic unit, priority, and a column labeled "303(d)/ESA." None of the inventories included a "narrative description including SIC codes which best reflects the principal products or services provided by each facility" or "pollutants generated by the site/source." Further, while the inventories did include a column "303(d)/ESA," which may be meant to satisfy the requirement to identify "whether the site/source is tributary to a Clean Water Act section 303(d) listed water body segment and generates pollutants for which the water body is impaired," the County only made effective use of the column in the agricultural facility inventory. For the industrial inventory, all of the 163 facilities were classified as "Unknown," and the commercial inventory classified all but 6 of its 1220 facilities as "Unknown" with respect to their impact on 303(d) listed waters. This failure to indicate the facility's potential impact on 303(d) listed waters violates MS4 permit requirements.

San Diego County's inventories included in the FY 2007-08 Annual Report were formatted differently from those included in the JURMP. The Annual Report inventories included the facility's name, address,

²³ See MS4 Permit at D.3.b(6).

²⁴ See MS4 Permit at D.3.b(1).

²⁵ See San Diego County JURMP attachment 7.1.1.

²⁶ See San Diego County JURMP attachment 7.1.2.

²⁷ See San Diego County JURMP attachment 7.1.3.

hydrologic unit, business type, and priority before and after inspection.²⁸ **The inventories did not include SIC codes, identify pollutants generated by the site/source, or identify whether the site/source is tributary to a Clean Water Act section 303(d) listed water body segment and generates pollutants for which the water body is impaired. Failure to include these elements in the inventories is a violation of the MS4 permit.**

2) *Non-filer List*

The MS4 permit requires each city to include in its annual report a list of industrial non-filers, those “industrial sites, including the name, address, and [Standard Industrial Classification (SIC)] code, that may require coverage under the General Industrial Permit for which a [Notice of Intent] has not been filed.”²⁹ Copermittees must also describe steps taken to identify non-filers.³⁰

Coastkeeper applauds San Diego County for including in its Annual Report a table, Table 5.8, listing non-filers identified during inspections. However, Table 5.4, which sets out where in Section 5 materials are located, states that the non-filer list is in Table 5.9, not Table 5.8. The County also clearly provided a “description of steps taken to identify non-filers,” as the MS4 permit requires. However, Coastkeeper is concerned that when the County found non-filers, it “notified operator of the requirement to file and provided materials” and reports non-filers to the State Water Quality Control Board. San Diego County should be taking enforcement action, such as issuing a notice of violation, against non-filers. Non-filers are not complying with the Best Management Practice of being covered by a general permit and developing and implementing a stormwater pollution prevention plan. Because non-filers are not complying with all applicable BMPs, the County must take enforcement action against non-filers in order to fulfill the MS4 permit requirement that “Each Copermittee **shall** require the use of pollution prevention methods by industrial and commercial sites/sources....”³¹

c. Nurseries: San Diego County Inspections and Follow-up

1) *San Diego County’s Nursery Inspections*

San Diego County’s inspections were adequate but not exemplary. Photographic evidence, while helpful, was inconsistent—some of the inspections that were provided to Coastkeeper were accompanied by photos, and some were not. Also, handwriting on inspection reports was sometimes difficult to read.

2) *San Diego County’s Nursery Follow-up*

The County does a good job of looking into complaints received. San Diego County offered one successful follow-up inspection. Unfortunately, five nurseries that needed follow-ups did not receive them. Two of the nurseries that did not receive follow-up inspections were of great concern because of egregious nature of the observed violations. Several times the County noted violations at a facility, including Kartuz Greenhouses and Parkway Nursery, but relied on the facility’s representation that the problem was fixed rather than visiting the facility to ensure the violation was corrected.

²⁸ See San Diego County JURMP Annual Report FY 2007-08 Attachment 5.

²⁹ See MS4 Permit at D.3.b(6).

³⁰ See MS4 Permit at J.3.a.(3)(d).xi

³¹ See MS4 Permit at D.3.b(2)(a).

Coastkeeper lodged an online complaint for Ontario Orchids through the Project Clean Water website. On Monday, August 2nd, Coastkeeper received a call from the County Agriculture Department, who had already visited the site, confirmed the violation, and required that Ontario Orchids come up with a plan within two weeks for ceasing discharge from its property. Action was swift, and the County actively pursued follow-up communication with us. The Agriculture Department promised to keep us apprised of the matter.

d. Coastkeeper's Nursery Field Visits

Nearly all of the sites we visited had at least one Best Management Practice implementation or compliance issue. The most common problem we noted was waste or litter on the grounds or the need to dispose of materials and old equipment. Signs of erosion and uncovered soil piles were also common. Ontario Orchids – though sound in most respects – had one of the most egregious discharge violations; nutrient-rich water ran from the property into the storm drains, creating pools of green water at the property line. Coastkeeper was also very concerned about what they observed at Jorge Hernandez's property. Specifically, we noted dumpsters overflowing with green waste, large piles of uncovered soil, and mountains of debris.

Several proprietors made comments regarding the County's involvement in their practices, evidencing an effort by the County to ensure the best practices are being employed. The owner of Rancho Vista Cacti & Succulent, for example, pointed out ice plant at the property line that the County required him to plant to mitigate any runoff. He also mentioned that the County may be requiring him to use a higher-tech greenhouse plastic in the future, which would eradicate the need to use greenhouse paint on clear plastic during hot months. Comments such as this suggest the County inspectors have a presence and influence the practices of nurseries within its jurisdiction.

e. Action Areas

Area	Problem	Severity	Fix
Industrial/ Commercial Inventory	Fails to identify pollutants	MS4 Permit Violation	Identify pollutants for each source
Industrial/ Commercial Inventory	Fails to identify if source tributary to 303(d) impaired water and source of pollutants for which water is impaired	MS4 Permit Violation	Identify sources tributary to 303(d) waters and if it is source of pollutants for which water is impaired
Non-filer List	Incorrect cross-reference for non-filer list in Annual Report	Hinders public review of non-filer list	Correct all mistaken cross-references in Annual Report
San Diego County nursery inspections	Inspection documentation was not consistent	Indicates potential lack of inspection documentation protocol	Adopt inspection documentation guidelines and follow
San Diego County nursery inspections	Inspection documentation was difficult to read	Hinders the public's ability to provide oversight of the inspection process	Ensure inspectors write clearly or implement electronic inspections forms if feasible
San Diego nursery inspections	Only followed-up with one nursery	Indicates potential lack of inspection follow-up protocol	Adopt inspection follow-up guidelines and follow

Area	Problem	Severity	Fix
Non-filers	San Diego County only informs non-filers of the requirement, provides information and reports to State Board	MS4 Permit Violation	Non-filers are not implementing all necessary BMPs because they are not covered by a general permit. San Diego County should take enforcement action against non-filers to ensure they develop and implement a SWPPP and implement all applicable BMPs

APPENDIX A: PHOTOGRAPHS TAKEN DURING NURSERY VISITS

This section includes examples of photos taken during Coastkeeper's nursery visits on July 20, 2010.

Carlsbad



Exposed piles of soil, and exposed equipment at Oasis Nursery and Landscaping.



Mechanical equipment hanging over stormwater facility at San Diego International Floral Trade Center.



Spilled or leaked material (perhaps oil) in parking lot at San Diego International Floral Trade Center.



Exposed debris and discarded material at San Diego International Floral Trade Center.

Vista



Open and exposed dumpster at Horticulture Sales Inc.



Large stain in parking lot at Fiesta Flowers.



Standing water in Fiesta Flowers' parking lot.



Standing water in Francis Biddle International's parking lot.



Uncovered green waste at Francis Biddle International.

San Diego County



Debris stacked at Jorge Hernandez' property.



Green waste and soil piles at Jorge Hernandez' property.



Erosion at Ontario Orchids.



Ontario orchids: green material and waste below the buildings.

July 28, 2010

Oasis Nursery & Landscaping
4901 El Camino Real
Carlsbad CA 92008

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Large exposed sediment piles in corner of property	Cover pile with a tarp and surround with waddles to prevent sediment movement, especially during rain
Tractor parked uncovered on loose soil	Cover with tarp or park under covered structure to prevent leakage of oils or metals
White metal structure along fence in front corner of property directly next to stormwater channel was exposed and rusting	Properly dispose of the metal structure or cover with a tarp so that metals do not fall (via rain or air) into stormwater channel

We applaud you for the Best Management Practices already in place. We noticed your efficient drip irrigation system, and your grounds were free of litter. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Sarah Devine
Legal Intern

Kelly Cramer
Legal Intern

Jill Witkowski
Staff Attorney

CC: City of Carlsbad, San Diego Regional Water Quality Control Board

July 28, 2010

Plant Play
4915 El Camino Real
Carlsbad CA 92008

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following area where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Dozens of cigarette butts on ground next to stormwater channel in corner of property	Provide receptacle for smokers to properly dispose their cigarette butts to prevent them from flowing into our stormwater system and into ocean

We applaud you for the Best Management Practices already in place. We noticed your grounds are well kept and there was no water runoff observed. In fact, your nursery was the only nursery audited in Carlsbad that did not have any visible stormwater violations. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to continue to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Sarah Devine
Legal Intern

Kelly Cramer
Legal Intern

Jill Witkowski
Staff Attorney

CC: City of Carlsbad, San Diego Regional Water Quality Control Board

July 28, 2010

San Diego International Floral Trade Center
5600 Avenida Encinas
Carlsbad, CA 92008

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your premises to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following area where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Trash, including a couch, in stormwater drainage ditch	Ensure that your stormwater drainage ditch does not serve as a dumping area, and periodically check to make sure it is free of litter
Oil spills in parking lot, some covered with dirt	Develop a spill response and containment kit and procedure. Properly dispose of dirt currently on oil spills, to prevent that toxic sediment from flowing or blowing into storm channel
Parking lot directly drains to stormwater drain in corner of parking lot behind dumpster	Protect storm drains at all times with perimeter controls, such as gravel bags
Substantial amount of trash and debris around all dumpsters on the property, in parking lot, and around loading docks	Sweep the area around dumpsters daily, do not allow them to become overflowed with trash, and protect the area with perimeter controls. Conduct daily site cleanings that would remove litter and trash from parking lots and loading dock areas
Large trucks parked directly over stormwater channel, and one truck has an exposed engine compartment	Park the trucks in a different area, so that oils and metals cannot drip into storm channel. Cover the exposed engine compartment with a tarp, or park it under a covered structure.

We applaud you for the Best Management Practices already in place. We noticed employees dry sweeping debris around the loading docks, and we also observed stencil signage over the storm drain saying it drains to the ocean. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to continue to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Sarah Devine
Legal Intern

Kelly Cramer
Legal Intern

Jill Witkowski
Staff Attorney

CC: City of Carlsbad, San Diego Regional Water Quality Control Board

July 29, 2010

Sunset Valley Orchids
1255 Navel Place
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
<ol style="list-style-type: none"> 1. Litter: trash out in the open throughout the property, torn & tattered plastic on greenhouses & ground 2. Improper disposal of waste material 3. Uncontained paint containers 	<ol style="list-style-type: none"> 1. Cover piles with a tarp and surround with waddles to prevent sediment movement, especially during rain 2. Remove all garbage from property; properly dispose of garbage, old equipment and hazardous materials
No visible signs of BMP's employed on property	Visit this website for guidelines: http://commserv.ucdavis.edu/CESanDiego/nursebmp.pdf
Visible Signs of Erosion	Channel water to appropriate storm drains

You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Dave Gibbs
Legal Intern

Krista deBoer
Legal Intern

Jill Witkowski
Staff Attorney

Cc: Regional Water Board
Cc: San Diego County Dept. of Public Works

July 29, 2010

Buena Creek Nursery
1280 Sunset Dr.
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Litter in greenhouse	Promptly and properly dispose of all garbage and waste
No BMPs for run-on or run-off control	Protect slopes with waddles, mulch or silt fence Visit this website for guidelines: http://commserv.ucdavis.edu/CESanDiego/nursebmp.pdf

We applaud you for the Best Management Practices already in place. We noticed all your pots were on cloth, and all equipment and fertilizer was stored under covered areas. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Dave Gibbs
Legal Intern

Krista deBoer
Legal Intern

Jill Witkowski
Staff Attorney

Cc: Regional Water Board
Cc: San Diego County Dept. of Public Works

July 29, 2010

Desert Theater Cactus & Succulent
800 Sunset Dr.
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Litter & uncovered waste piles	Promptly and properly dispose of all garbage and waste; cover piles with a tarp or plastic.
Visible signs of erosion	Implement proper BMPs to prevent stormwater-causing erosion; apply mulch, add waddles or add a silt fence to slopes

We applaud you for the Best Management Practices already in place. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Dave Gibbs
Legal Intern

Krista deBoer
Legal Intern

Jill Witkowski
Staff Attorney

Cc: Regional Water Board
Cc: San Diego County Dept. of Public Works

July 29, 2010

Green Acres Nursery, Inc.
1411 Buena Vista Dr.
Vista, CA 92083

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Litter and materials stored uncovered	Promptly and properly dispose of all waste. Store equipment in covered area or cover materials with tarp.
Some Visible Signs of Erosion	Channel water to appropriate storm drains; protect slopes with waddles, mulch or silt fence
Exposed Soil in Landscaping	Either add landscaping to exposed soil, or take measures to contain soil by adding gravel, surrounding with waddles, etc.
Slope not protected by mulch, waddles or a silt fence	Add mulch, waddles or silt fence to any sloping areas
Overhead watering system	Hand water or implement a drip system that waters plants individually to minimize waste.

You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Dave Gibbs
Legal Intern

Krista deBoer
Legal Intern

Jill Witkowski
Staff Attorney

Cc: Regional Water Board

Cc: San Diego County Dept. of Public Works
July 29, 2010

Haute House Orchids
805 Mar Vista Dr.
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Visible Signs of Erosion on downhill side of property	Channel water to appropriate storm drains; protect slopes with waddles, mulch or silt fence
Uncovered and uncontained soil piles	Cover soil piles with tarp or plastic, surround with waddles to prevent sediment movement
Litter; piles of unused wood stored uncovered	Properly and promptly dispose of all waste; cover unused materials or move to a covered area
Paint wash uncontained; evidence of paint thrown into bushes	Appropriately dispose of paint in a way that will keep it out of the stormdrains

We applaud you for the Best Management Practices already in place. We noticed your hillsides are covered with landscaping that filters and slows the movement of stormwater. Your cement culvert effectively channels water along the property; measures are also in place to funnel rainwater from roofs into that culvert. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Dave Gibbs
Legal Intern

Krista deBoer
Legal Intern

Jill Witkowski
Staff Attorney

Cc: Regional Water Board

Cc: San Diego County Dept. of Public Works
July 29, 2010

Kartuz Greenhouses
1408 Sunset Drive
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Litter and uncovered old equipment behind greenhouse	Promptly and properly dispose of all garbage and waste
Pipes and other materials stored uncovered	Store materials and equipment in covered area, or put tarps over piles.

We applaud you for the Best Management Practices already in place. We noticed you had implemented appropriate BMPs for preventing stormwater from running onto your property. You had applied mulch to all bare soil. Plants stored outside were stored on filter fabric. All indoor plants were elevated. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Dave Gibbs
Legal Intern

Krista deBoer
Legal Intern

Jill Witkowski
Staff Attorney

Cc: Regional Water Board
Cc: San Diego County Dept. of Public Works

July 29, 2010

Kent's Bromeliad Nursery, Inc.
1266 Ridge Road
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Uncovered waste or hazardous materials all over property.	Store materials and equipment in covered area Promptly remove or properly dispose of all garbage and waste.
Hazardous waste stored on the ground	All hazardous materials should be stored on raised surfaces
Equipment & tractors stored uncovered	Vehicles and equipment should be stored in covered area
Litter, uncovered dumpsters and trash cans	All trash cans and dumpsters should have lids
Visible signs of erosion	Protect slopes with mulch, waddles or silt fence
Exposed soil in landscaping	Either add plants/landscaping to exposed dirt areas, or contain with rock riprap, waddles, etc.

We applaud you for the Best Management Practices already in place. We noticed you had flooring in your greenhouses that allowed water to be filtered through a gravel. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Dave Gibbs
Legal Intern

Krista deBoer
Legal Intern

Jill Witkowski
Staff Attorney

Cc: Regional Water Board

Cc: San Diego County Dept. of Public Works
July 29, 2010

Mueller's Greenhouses
1524 Sunset Dr.
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Full Dumpster & Uncovered trash can	All trash receptacles should have lids; have dumpsters emptied regularly
Visible Signs of Erosion	Channel water to appropriate storm drains; protect slopes with wattles, mulch or silt fence
Loading Doc had Litter	Promptly and properly dispose of all waste and garbage
Uncovered bags of fertilizer or compost stored on the ground	Elevate and cover fertilizer/compost bags.

We applaud you for the Best Management Practices already in place. We noticed your rooftop water goes directly into the storm drain system. All of your equipment was well-covered, and none was stored outdoors. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Dave Gibbs
Legal Intern

Krista deBoer
Legal Intern

Jill Witkowski
Staff Attorney

Cc: Regional Water Board
Cc: San Diego County Dept. of Public Works

July 29, 2010

New West Nursery
1431 Hedonia Ave.
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Visible Signs of Erosion on downhill side of property	Channel water to appropriate storm drains; protect slopes with waddles, mulch or silt fence
Uncovered and uncontained soil and compost piles	Cover soil piles with tarp or plastic, surround with waddles to prevent sediment movement
Litter; overflowing and uncovered trash cans	Properly and promptly dispose of all waste; empty trash receptacles once full; place lids over all garbage receptacles
Equipment stored uncovered	Tractor partially covered – make sure cover extends to the whole tractor. Golf cart and trailer should be stored in covered areas
Old waddles no longer effective	Replace old waddles as soon as you notice integrity has been compromised
Standing Water	Identify source of water and take appropriate mitigation measures (especially if caused by over-watering)
Fertilizer stored on ground	Nice job covering fertilizer – be sure to elevate it, as well.

We applaud you for the Best Management Practices already in place. We noticed your hillsides are protected by silt fences, and waddles are in place to slow erosion. Some outdoor plants are stored on filter fabric. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Dave Gibbs
Legal Intern

Krista deBoer
Legal Intern

Jill Witkowski
Staff Attorney

Cc: Regional Water Board
Cc: San Diego County Dept. of Public Works



TEL. 619.758.7743
FAX 619.224.4638

ADDRESS 2825 DEWEY ROAD, SUITE # 200
SAN DIEGO, CALIFORNIA 92106

www.sdcoastkeeper.org

IMPACT

July 29, 2010

Ontario Orchids
703 Pomelo Drive
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Surface Runoff into the MS4 stormdrain Standing water with algae bloom	Eliminate or minimize runoff into the MS4; do not overwater or over-fertilize Capture & reuse nutrient-rich runoff. Visit this website for guidelines: http://commserv.ucdavis.edu/CESanDiego/nursebmp.pdf
Visible Signs of Erosion	Channel water to appropriate storm drains; protect slopes with waddles, mulch or silt fence

We applaud you for the Best Management Practices already in place. We noticed you had flooring in your greenhouses that allowed water to be filtered through a permeable cover and then through a gravel layer. We also noticed your chemicals were raised off the ground, and all chemicals and equipment were covered to prevent runoff during rains. Your concrete-lined channels are effective for conveying water while minimizing sediment movement. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Dave Gibbs
Legal Intern

Krista deBoer
Legal Intern

Jill Witkowski
Staff Attorney

Cc: Regional Water Board

Cc: San Diego County Dept. of Public Works
July 29, 2010

Parkway Nursery
1405 Ridge Road
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Uncovered Fuel Tanks	Cover fuel tanks with tarp or a roofed- structure
Piles not covered or properly contained	Tarps should cover all dirt and mulch piles, surround the piles with waddles to prevent sediment movement
Visible signs of erosion	Protect slopes with waddles, mulch or silt fence
Fabric-lined ditch at property line was full of sediment	Clean regularly to prevent sediment from getting into storm drain
Old waddles need to be replaced	Replace waddles as soon as their integrity is compromised and they are no longer effective
Watering during mid-day hours, runoff from overwatering	Do all watering in early morning hours or evening hours to prevent evaporation Do not overwater such that runoff is created
Uncovered vehicle	Stored and parked vehicles should be under roofs to prevent vehicle contaminants being carried to storm drains in rain

We applaud you for the Best Management Practices already in place. We noticed you effectively direct stormwater to detention basins and sediment traps. Some of your culverts were fabric lined, which minimizes sediment movement. Some of your dirt piles were appropriately covered and contained. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit or Best Management Practices, feel free to contact us.

Sincerely,

Dave Gibbs
Legal Intern

Krista deBoer
Legal Intern

Jill Witkowski
Staff Attorney

Cc: Regional Water Board
Cc: San Diego County Dept. of Public Works

July 29, 2010

Playa Nursery
1505 Buena Vista Dr.
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
No visible BMPs on site	Visit this website for guidelines: http://commserv.ucdavis.edu/CESanDiego/nursebmp.pdf
Visible Signs of Erosion	Channel water to appropriate storm drains; protect slopes with waddles, mulch or silt fence
Uncovered and uncontained soil piles	Cover soil piles with tarp or plastic, surround with waddles to prevent sediment movement
Litter	Properly and promptly dispose of all waste
Exposed soil in landscaping	Contain exposed soil by adding landscaping or by surrounding with waddles, covering with gravel, or other appropriate measures

You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Dave Gibbs
Legal Intern

Krista deBoer
Legal Intern

Jill Witkowski
Staff Attorney

Cc: Regional Water Board
Cc: San Diego County Dept. of Public Works

July 29, 2010

Rancho Vista Cacti & Succulents
1430 Buena Vista Dr.
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Tractor & equipment stored uncovered Tires & Pipes stored uncovered	Promptly and properly dispose of all waste. Store equipment in covered area. Cover tires and other materials with tarp, or move a covered area.
Some Visible Signs of Erosion	Channel water to appropriate storm drains; protect slopes with waddles, mulch or silt fence
Exposed Soil in Landscaping	Either add landscaping to exposed soil, or take measures to contain soil by adding gravel, surrounding with waddles, etc.

We applaud you for the Best Management Practices already in place. We noticed no runoff from your property, the downhill side of the property line was protected using ice plant, and slopes between greenhouses were landscaped to slow and filter the flow of stormwater. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Dave Gibbs
Legal Intern

Krista deBoer
Legal Intern

Jill Witkowski
Staff Attorney

Cc: Regional Water Board

Cc: San Diego County Dept. of Public Works
July 30, 2010

Flamingo Holland
1250 Avenida Chelsea
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Oil stains in loading dock	Sweep loading areas after each business day and prevent and contain oil leaks.
Green waste on ground in dumpster port.	Place all waste in covered waste receptacles
Standing water in drive way.	Prevent over watering and follow drought restrictions. Do not power wash surfaces or equipment.

We applaud you for the Best Management Practices already in place. We noticed you had raised plants off the ground on pallets. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Jill Witkowski
Staff Attorney

Stacee Karras
Legal Intern

Rory Allen
Legal Intern

CC: City of Vista, San Diego Regional Water Quality Control Board

July 30, 2010

Dos Gringos
3260 Corporate View
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Oil stains in loading dock	Sweep loading areas after each business day and prevent and contain oil leaks.
Excess materials uncovered in storage area.	Cover equipment and pots with tarp or store under overhangs.

We applaud you for the Best Management Practices already in place. We noticed you raised your pots and materials on pallets and covered most material. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Jill Witkowski
Staff Attorney

Stacey Karras
Legal Intern

Rory Allen
Legal Intern

CC: City of Vista, San Diego Regional Water Quality Control Board

July 30, 2010

Fiesta Flowers
2820 La Mirada Drive
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Uncovered dumpsters	Ensure that dumpster lids are in place and closed.
Standing water	follow drought restrictions and do not power wash surfaces or equipment
Oil stained loading dock	Sweep loading areas after each business day and prevent and contain oil leaks.

We applaud you for the Best Management Practices already in place. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Jill Witkowski
Staff Attorney

Stacey Karras
Legal Intern

Rory Allen
Legal Intern

CC: City of Vista, San Diego Regional Water Quality Control Board

July 30, 2010

Calmex Wholesale Growers
2680 La Mirada Drive
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Tires on hillside	Store material and equipment inside or on pallets under tarps.
Standing water	Prevent over watering and follow drought restrictions. Do not power wash surfaces or equipment.

We applaud you for the Best Management Practices already in place. We noticed you covered dumpsters to prevent contamination of rainwater. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Jill Witkowski
Staff Attorney

Stacey Karras
Legal Intern

Rory Allen
Legal Intern

CC: City of Vista, San Diego Regional Water Quality Control Board

July 30, 2010

Francis Biddle International
2506 Pioneer Ave.
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Exposed green waste in dumpster	Ensure that waste remains within dumpster and cover.
Standing water	Prevent over watering and follow drought restrictions. Do not power wash surfaces or equipment.
Buckets stored on ground and uncovered.	Store material on pallets under tarps or overhangs.

We applaud you for the Best Management Practices already in place. We noticed you had white tarps to provide cover for most of the out door storage area. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Jill Witkowski
Staff Attorney

Stacey Karras
Legal Intern

Rory Allen
Legal Intern

CC: City of Vista, San Diego Regional Water Quality Control Board

July 30, 2010

Superior Plant Sales
2581 Pioneer Ave
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Litter and debris in loading dock	Sweep loading areas after each business day and prevent and contain oil leaks.
Standing water	Prevent over watering and follow drought restrictions. Do not power wash surfaces or equipment.

We applaud you for the Best Management Practices already in place. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Jill Witkowski
Staff Attorney

Stacey Karras
Legal Intern

Rory Allen
Legal Intern

CC: City of Vista, San Diego Regional Water Quality Control Board

July 30, 2010

Briggs Tree Company
1111 Poinsettia Avenue
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Incomplete perimeter controls at both P1 and P2	Gravel bags, straw wattles, or a silt fence should be placed and maintained along the entire fence line, especially at the bottom of slopes.
Porta potty on the ground in P2	Additional perimeter controls should be placed around portable restrooms and dumpsters
Open storm drain to Poinsettia	Gravel bags and wattles should be placed around drains and sediment accumulation should be removed regularly.

We applaud you for the Best Management Practices already in place. We noticed you have cement channel and sandbags around the street side perimeter, plants are raised off the ground, and soil bags are stored on pallets. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Jill Witkowski
Staff Attorney

Stacey Karras
Legal Intern

Rory Allen
Legal Intern

CC: City of Vista, San Diego Regional Water Quality Control Board



TEL. 619.758.7743
FAX 619.224.4638

ADDRESS 2825 DEWEY ROAD, SUITE # 200
SAN DIEGO, CALIFORNIA 92106

www.sdcoastkeeper.org

IMPACT

July 30, 2010

Horticulture Sales Inc.
1330 Distribution Way
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains.

Observation	Suggestion for Improvement
Oil stains and litter on loading dock	Sweep loading areas after each business day and prevent and properly clean oil spills.
Exposed dumpster	Ensure that dumpster lids are in place and closed.

We applaud you for the Best Management Practices already in place. We noticed your clean loading dock and your enclosed storage containers. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Jill Witkowski
Staff Attorney

Stacey Karras
Legal Intern

Rory Allen
Legal Intern

CC: City of Vista, San Diego Regional Water Quality Control Board

July 30, 2010

Hydroscape Products
2120 La Mirada Drive
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains.

We applaud you for the Best Management Practices already in place. We noticed your clean loading dock, free of oil stains and litter. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Jill Witkowski
Staff Attorney

Stacey Karras
Legal Intern

Rory Allen
Legal Intern

CC: City of Vista, San Diego Regional Water Quality Control Board

July 30, 2010

Passion Growers West
1352 Decision Street
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Uncovered pallets	Cover pallets and other material stored outdoors with a tarp or overhang.

We applaud you for the Best Management Practices already in place. We noticed your clean loading dock and parking facilities. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Jill Witkowski
Staff Attorney

Stacey Karras
Legal Intern

Rory Allen
Legal Intern

CC: City of Vista, San Diego Regional Water Quality Control Board

July 30, 2010

D & M Wholesale Flowers
3208 La Mirada Drive
San Marcos, CA 92078

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Piles of garbage of and debris	Trash should be placed in proper waste receptacles, debris should be off the ground and covered
Uncovered trash cans and dumpsters	use available lids and coverings
Lack of perimeter controls along street side of property	Use gravel bags, silt fences, or straw wattles to prevent erosion and runoff

We applaud you for the Best Management Practices already in place. We noticed you contained most growing activities inside greenhouses and rain coverings.. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Jill Witkowski
Staff Attorney

Stacey Karras
Legal Intern

Rory Allen
Legal Intern

CC: City of San Marcos, San Diego Regional Water Quality Control Board

July 30, 2010

Jorge Hernandez
1431 Hedionda Ave
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
Overflowing dumpster of green waste	Ensure that dumpster lids are in place and closed.
Large debris pile and uncovered soil pile	Trash should be placed in waste receptacles , and sediment piles should be ringed by sandbags or silt fences, additionally loose soil should be covered.
Greenhouses and rain coverings are in poor condition	Ensure that roofing and rain covers are in place and are repaired
Improperly stored gas can	Store flammables and dangerous liquids in hazmat marked storage lockers
Plants placed on ground or torn ground covering	plants should be raised off the ground.

We applaud you for the Best Management Practices already in place. We noticed you have a perimeter of plastic ground covering. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Jill Witkowski
Staff Attorney

Stacey Karras
Legal Intern

Rory Allen
Legal Intern

CC: County of San Diego, San Diego Regional Water Quality Control Board

July 30, 2010

Buena Creek Nursery
1305 Navel Pl.
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains. While at your site, we observed the following areas where you can improve your stormwater Best Management Practices:

Observation	Suggestion for Improvement
No perimeter controls	the use of wattles, silt-fences, or perimeter controls can eliminate sediment and waste run-off.
Open dumpster	Place all waste in covered waste receptacles

We applaud you for the Best Management Practices already in place. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Jill Witkowski
Staff Attorney

Stacey Karras
Legal Intern

Rory Allen
Legal Intern

CC: County of San Diego, San Diego Regional Water Quality Control Board

July 30, 2010

United Plant Growers Inc.
1054 Mar Vista Drive
Vista, CA 92081

Re: Stormwater Audit

To Whom It May Concern:

San Diego Coastkeeper is the county's largest professional environmental organization protecting the region's inland and coastal waters for the communities and wildlife that depend on them. As part of our efforts, we recently conducted stormwater audits of nurseries in the Agua Hedionda watershed.

On July 20th, representatives from San Diego Coastkeeper visited your nursery to identify the Best Management Practices you employ to minimize the discharge of sediment and pollutants that make their way from your property to storm drains.

We applaud you for the Best Management Practices already in place. We noticed your growing activity was mostly limited to enclosed structures and greenhouses. You, your employees, and your business play an important role in reducing pollution and protecting our local waters for everyone to use. We encourage you and your employees to be vigilant about maintaining stormwater Best Management Practices and do your part to protect our waterways.

If you have any questions about the audit, or about Best Management Practices, feel free to contact us.

Sincerely,

Jill Witkowski
Staff Attorney

Stacey Karras
Legal Intern

Rory Allen
Legal Intern

CC: County of San Diego, San Diego Regional Water Quality Control Board