

**Los Angeles County Municipal Storm Water Permit (Order 01-182)  
Individual Annual Report Form  
Attachment U-4**

This form summarizes the requirements in Order No. 01-182. Each Permittee must complete this form in its entirety, except for those requirements applicable only to the Principal Permittee. Only report activities that were performed during the previous fiscal year. Upon completion, this form shall be submitted to the Principal Permittee, by the date specified by the Principal Permittee, for inclusion in the unified Annual Storm Water Program Report. Attachments should be included where necessary to provide sufficient information on program implementation.

The goals of this Report are to: 1) concisely document implementation of the Storm Water Quality Management Program (SQMP) during the past fiscal year; 2) evaluate program results for continuous improvement; 3) to determine compliance with Order 01-182; and 4) to share this information with other Permittees, municipal decision makers, and the public.

<b>!</b>	<b>YOU MUST FILL OUT ALL THE INFORMATION REQUESTED</b> <i>Do not leave any of the sections blank.</i>
<b>N/A</b>	If the question does not apply to your municipality, please indicate N/A in the space provided and provide a brief explanation
<b>U</b>	If the information requested is currently unavailable, please indicate U in the space provided and give a brief explanation.

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**Reporting Year 2011-2012**

**I. Program Management**

- A. Permittee Name: City of Culver City
- B. Permittee Program Supervisor: Damian Skinner  
Title: Environmental Programs & Operations Division Manager  
Address: 9505 Jefferson Blvd.  
City/Zip Code: Culver City, CA 90232  
Phone/Fax: 310-253-6421; 310-253-6430  
Email: damian.skinner@culvercity.org
- C. In the space below, briefly describe how the storm water program is coordinated within your agency's departments and divisions. Include a description of any problems with coordination between departments. To facilitate this, complete the Table 1.

The Department of Public Works (PW), Environmental Programs and Operation Division (EPO) is the lead for the implementation of the storm water NPDES program. Activities are coordinated with:

- Engineering: LSWPPP & SUSMP reviews
- Environmental Programs & Operations: street sweeping and refuse collection
- Planning: SUSMP implementation
- Community Development: SWPPP implementation and condition NPDES requirements into their contracted work
- Building and Safety: coordinate with SUSMP review and approval
- Code Enforcement: regarding spill complaints and discharges
- Transportation: public transportation activities
- Street Maintenance: public agency activities and sewer related issues
- Fire: public agency activities and for emergency spill response
- Police: public agency activities and for emergency spill response
- Parks, Recreation, & Community Services: public agency activities

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**TABLE 1 – Program Management**

<b>Storm Water Management Activity</b>	<b>Division / Department</b>	<b># of Individuals Responsible for Implementing</b>
1. Outreach & Education	Environmental Programs & Operations (EPO) / Public Works (PW)	3
2. Industrial/Commercial Inspections	EPO / PW Consultant	2 2-4
3. Construction Permits/Inspections	Engineering Division / PW Building & Safety	5 4
4. IC/ID Inspections	EPO / PW Code Enforcement Street & Sewer	2 2 5
5. Street Sweeping	EPO / PW Contractor (Clean Streets)	4 4+
6. Catch Basin Cleaning	Contractor (LA County DPW) PW: Street & Sewer	8+
7. Spill Response	PW: EPO, Engineering, Street & Sewer Fire, Transportation, Police	15+
8. Development Planning (project/SUSMP review and approval)	EPO & Engineering / PW	5
9. Trash Collection	EPO / PW	25+

**D. Staff and Training**

Attach a summary of staff training over the last fiscal year. This shall include the staff name, department, type of training, and date of training. See attached training sheet.

**E. Budget Summary**

1. Does your municipality have a storm water utility? Yes  No   
If no, describe the funding source(s) used to implement the requirements of Order No. 01-182.

City's General Fund: "Improvement and Acquisition" (I&A) Fund.

2. Are the existing financial resources sufficient to accomplish all required activities? Yes  No
3. Complete Table 2 to the extent that accurate information is available (indicate U in the spaces where the information is unavailable) and report any supplemental dedicated budgets for the same categories on the lines below the table.
4. List any additional state/federally funded projects related to storm water.

Proposition 50 Grant: Citywide BMP Treatment Train Project, \$1,194,100.00

- 672 - Catch basin full capture devices
- 4 - Rain gardens, cistern and downspout disconnect
- 95 – Trash/recycle receptacles placed throughout City
- Public Outreach

Environment Protection Agency Federal Appropriation Fund: \$485,000

- 162 – Catch basin full capture devices

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Table 2

Program Element	Expenditures in Previous Fiscal Year	Estimated Amount Needed to Implement Order 01-182
1. Program Management		
a. Administrative costs	\$250,000	\$500,000
b. Capital costs	U	U
2. Public Information & Participation		
a. Public Outreach/Education	\$10,000	\$100,000
b. Employee Training	\$1,000	\$2,000
c. Corporate Outreach	\$1,000	\$2,000
d. Business Assistance	\$1,000	\$2,000
3. Industrial/Commercial inspection and site visit activities	\$1,000	\$250,000
4. Development Planning	\$20,000	\$50,000
5. Development Construction		
a. Construction inspections	\$75,000	\$150,000
6. Public Agency Activities		
a. Maintenance of structural and treatment control BMPs	\$10,000	\$100,000
b. Municipal street sweeping	\$300,000	\$1,500,000
c. Catch basin cleaning	\$50,000	\$250,000
d. Trash collection/recycling	\$11,000,000	\$60,000,000
e. Capital costs	U	U
f. Other	U	U
7. IC/ID Program		
a. Operations & Maintenance	\$25,000	\$250,000
b. Capital Costs	U	U
8. Monitoring	\$65,000	\$1,000,000
9. Other	U	U
10. TOTAL	\$11,809,000	\$64,156,000

List any supplemental dedicated budgets for the above categories:

Sanitation Enterprise Fund

List any activities that have been contracted out to consultants/other agencies:

- Industrial/Commercial Inspections
- Construction Inspections
- Municipal Street Sweeping
- Catch basin cleaning
- Monitoring

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**II. Receiving Water Limitations (Part 2)**

- A. Are you aware, or have you been notified, of any discharges from your MS4 that cause or contribute to a condition of nuisance or to the violation of any applicable water quality standards? Yes  No
- B. Has the Regional Board notified you that discharges from your MS4 are causing or contributing to an exceedance of water quality standards? Yes  No
- C. If you answered Yes to either of the above questions, you must attach a Receiving Water Limitations (RWL) Compliance Report. The Report must include the following:
1. A description of the pollutants that are in exceedance and an analysis of possible sources;
  2. A plan to comply with the RWL (Permit, Part 2);
  3. Changes to the SQMP to eliminate water quality exceedances;
  4. Enhanced monitoring to demonstrate compliance; and
  5. Results of implementation.

**III. SQMP Implementation (Part 3)**

- A. Has your agency implemented the SQMP and any additional controls necessary to reduce the discharges of pollutants in storm water to the maximum extent practicable? Yes  No
- B. If your agency has implemented additional or different controls than described in the countywide SQMP, has your agency developed a local SQMP that reflects the conditions in its jurisdiction and specifies activities being implemented under the appropriate elements described in the countywide SQMP? Yes  No
- C. Describe the status of developing a local SQMP in the box below.

The City follows the model programs developed in the Countywide SQMP.

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D. If applicable, describe an additional BMP, in addition to those in the countywide SQMP, which your city has implemented to reduce pollutants in storm water to the maximum extent practicable.

CDS Units for capture of solids  
Hundreds of 2-tiered full capture trash screens  
Two fully built rain gardens with two more in design phase

E. Watershed Management Committees (WMCs)

1. Which WMC are you in? Ballona Creek/Santa Monica Bay
2. Who is your designated representative to the WMC?  
Environmental Programs & Operations Division: Kaden Young
3. How many WMC meetings did you participate in last year? Two (2)
4. Describe specific improvements to your storm water management program as a result of WMC meetings.

There were no improvements to our storm water management program as result of the WMC meetings this year. The NPDES MS4 permit is in its 10<sup>th</sup> year and the permittees are all awaiting the next permit. The current requirements of the permit have been met and implemented.

The WMC meeting discusses items that have already been discussed in other NPDES related meetings throughout the County that meet on a monthly basis instead of a quarterly basis.

5. Attach any comments or suggestions regarding your WMC.

The Santa Monica Bay/Ballona Creek Watershed Management Committee meets quarterly in Manhattan Beach. A County representative chairs the meeting and has done a great job this year. Each municipality brought new ideas to the table to share and in return received valuable feedback from the group. However, as mentioned above, with other meetings going on throughout the County, the WMC meetings have been very repetitive of the others and can be eliminated.

F. Storm Water Ordinance

1. Have you adopted a storm water and urban runoff ordinance to enforce all requirements of Order 01-182? Yes  No   
If not, describe the status of adopting such an ordinance.

N/A

2. If yes, have you already submitted a copy of the ordinance to the Regional Board? Yes  No   
If not, please attach a copy to this Report.

3. Were any amendments made to your storm water ordinance during the last fiscal year? Yes  No   
If yes, attach a copy of amendments to this Report.

G. Discharge Prohibitions

1. List any non-storm water discharges you feel should be further regulated:

None at this time.

2. List any non-storm water discharges you feel should be exempt, and provide an explanation for each:

None at this time.

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**IV. Special Provisions (Part 4)**

**A. Public Information and Participation (Part 4.B)**

In addition to answering the following questions, attach a summary of all storm water education activities that your agency conducted or participated in last year.

**1. No Dumping Message**

- a. How many storm drain inlets does your agency own? **130**
- b. How many storm drain inlets were marked with a no dumping message in the last fiscal year? **0**
- c. What is the total number of storm drain inlets that are legibly marked with a no dumping message? **130**

If this number is less than the number in question 1.b, describe why all inlets have not been marked, the process used to implement this requirement, and the expected completion date.

**N/A, all inlets are marked.**

- d. How many public access points to creeks, channels, and other water bodies within your jurisdiction have been posted with no dumping signage in the past year? **All 5 entrances to Ballona Creek in Culver City have no dumping signs posted. Overland Ave. and Sepulveda Blvd. have two access points each while Duquesne Ave. only has one.**

Describe your agency's status of implementing this requirement by the date required in Order No. 01-182.

**This requirement has been implemented and maintenance is done on an annual basis.**

**2. Reporting Hotline**

- a. Has your agency established its own hotline for reporting and for general storm water management information? Yes  No
- b. If so, what is the number? **(310) 253-6445**
- c. Is this information listed in the government pages of the telephone book? Yes  No
- d. If no, is your agency coordinated with the countywide hotline? Yes  No
- e. Do you keep record of the number of calls received and how they were responded to? Yes  No
- f. How many calls were received in the last fiscal year? **~2 every quarter**
- g. Describe the process used to respond to hotline calls.

**Hotline calls and electronic reporting are responded to within 24 hours (typically within several hours). The City also utilizes a Customer Relationship Management web based system that allows residents to ask questions or report issues on the City's website. Investigations are typically conducted by EPO Division staff or Engineering. If needed, Code Enforcement will assist.**

- h. Have you provided the Principal Permittee with your current reporting contact information? Yes  No

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- i. Have you compiled a list of the general public reporting contacts for all Permittees and posted it on the [www.888CleanLA.com](http://www.888CleanLA.com) web site (*Principal Permittee only*)? N/A  
If not, when is this scheduled to occur?

3. Outreach and Education

- a. Describe the strategy developed to provide outreach and bilingual materials to target ethnic communities. Include an explanation of why each community was chosen as a target, how program effectiveness will be determined, and status of implementation. (*Principal Permittee only*)  
N/A
- b. Did the Principal Permittee organize quarterly Public Outreach Strategy meetings that you were aware of? Yes  No   
How many Public Outreach Strategy meetings did your agency participate in last year? 4  
Explain why your agency did not attend any or all of the organized meetings.

N/A, staff attended all four meetings.

Identify specific improvements to your storm water education program as a result of these meetings:

The City uses similar methods the County has employed to promote the stormwater message. These methods include restaurant inspections as well as distribution of outreach materials (pet waste and over irrigation); and implementing a used oil recycling program.

List suggestions to increase the usefulness of quarterly meetings:

None at this time. The County did an excellent job in terms of meeting content and made the meetings available online in an interactive chatroom format.

If quarterly Public Outreach Strategy meetings were not organized, explain why not and when this requirement will be implemented. (*Principal Permittee only*)  
N/A

- c. Approximately how many impressions were made last year on the general public about storm water quality via print, local TV, local radio, or other media? 90.1 million  
(billboards, brochures, pamphlets, calendars, pens, re-useable bags, used motor oil/filter campaign)

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- d. Describe efforts your agency made to educate local schools on storm water pollution.

Culver City holds an annual Clean the Ballona Creek event in conjunction with Heal the Bay and the California Coastal Commission during the annual Worldwide Coastal Cleanup day. Outreach to the Culver City Unified School District and private schools located in Culver City are primary targets for participation. Marketing is done through flyers; teacher education and additional outreach is done through the Culver City's Parks and Recreation's Teen Center.

Students are also involved in the design and maintenance of rain gardens that are built on school property. These projects help students learn and understand storm water pollution prevention. A new rain garden has been constructed along Ballona Creek that will treat the runoff from the Culver City Middle School parking lot. Students can visually see how stormwater is treated prior to discharging to Ballona Creek.

- e. Did you provide all schools within each school district in Los Angeles County with materials necessary to educate a minimum of 50 percent of all school children (K-12) every 2 years on storm water pollution (*Principal Permittee only*)?  
N/A
- f. Describe the strategy developed to measure the effectiveness of in-school educational programs, including assessing students' knowledge of storm water pollution problems and solutions before and after educational efforts (*Principal Permittee only*).  
For Permit Years 2-5, attach an assessment of the effectiveness of in-school storm water education programs.  
N/A
- g. What is the behavioral change target that was developed based on sociological data and other studies (*Principal Permittee only*)?  
If no target has been developed, explain why and describe the status of developing a target.  
What is the status of meeting the target by the end of Year 5?  
N/A

4. Pollutant-Specific Outreach

- a. Attach a description of each watershed-specific outreach program that your agency developed (*Principal Permittee only*). All pollutants listed in Table 1 (Section B.1.d.) must be included. N/A
- b. Did your agency cooperate with the Principal Permittee to develop specific outreach programs to target pollutants in your area? Yes  No
- c. Did your agency help distribute pollutant-specific materials in your city? Yes  No

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d. Describe how your agency has made outreach material available to the general public, schools, community groups, contractors and developers, etc...

The City distributed educational materials to the general public & businesses by:

- Providing BMP leaflets at the Engineering Counter (for all the contractors who must develop LSWPPP or work on SUSMP projects)
- Distributing materials during commercial/industrial inspections
- Providing outreach materials at public events, such as Children’s Earth Day, George Barris Car Show, Fiesta La Ballona, Ballona Creek Clean Up, etc.

5. Businesses Program

a. Briefly describe the Corporate Outreach Program that has been developed to target gas stations and restaurant chains (Principal Permittee only). *N/A*

b. How many corporate managers did your agency (Principal Permittee only) reach last year? *N/A*

c. What is the total number of corporations to be reached through this program (Principal Permittee only)? *N/A*

d. Is your agency meeting the requirement of reaching all gas station and restaurant corporations once every two years (Principal Permittee only)? Yes  No

*N/A*

If not, describe measures that will be taken to fully implement this requirement. *N/A*

e. Has your agency developed and/or implemented a Business Assistance Program? Yes  No

If so, briefly describe your agency’s program, including the number of businesses assisted, the type of assistance, and an assessment of the program’s effectiveness.

The City continues to assist businesses to better understand the storm water program and BMPs, through its industrial/commercial facilities inspection program. Businesses can express their concerns anonymously through the City’s website. City staff is available to help answer questions and to strategize business specific programs.

6. Did you encourage local radio stations and newspapers to use public service announcements? Yes  No

How many media outlets were contacted? 0

Which newspaper or radio stations ran them?

*N/A*

Who was the audience?

*N/A*

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7. Did you supplement the County's media purchase by funding additional media buys? Yes  No   
 Estimated dollar value/in-kind contribution: \$0  
 Type of media purchased: N/A  
 Frequency of the buys: N/A  
 Did another agency help with the purchases? Prop 50 Funding
8. Did you work with local business, the County, or other Permittees to place non-traditional advertising? Yes  No   
 If so, describe the type of advertising.

N/A

9. Did you establish local community partnerships to distribute educational storm water pollution prevention material? Yes  No   
 Describe the materials that were distributed:

Storm water posters, tip-cards, buttons, smart gardening brochures, used-oil logo towels, storm water coloring books and crayons/pens, recycled pencils, and doggie poop bags. Also, used oil pamphlets, containers and shop rags at car show and at other relevant exhibits.

Who were the key partners?

Library, Eco Station, Fiesta La Ballona, various businesses, West Side Cities Used Oil Committee (West Hollywood, Beverly Hills and Culver City), Culver City Studios, Sony Pictures Studios.

Who was the audience (businesses, schools, etc.)?

General public, children, and businesses.

10. Did you participate in or publicize workshops or community events to discuss storm water pollution? Yes  No   
 How many events did you attend?

4 (Ballona Creek Clean-Up, Children's Earth Day at Eco Station, Car Show, and Fiesta La Ballona)

11. Does your agency have a website that provides storm water pollution prevention information? Yes  No

If so, what is the address?  
[www.culvercity.org/en/Government/PublicWorks/EnvironmentalPrograms/Stormwater](http://www.culvercity.org/en/Government/PublicWorks/EnvironmentalPrograms/Stormwater)

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12. Has awareness increased in your community regarding storm water pollution? Yes  No

Do you feel that behaviors have changed? Yes  No

Explain the basis for your answers. Include a description of any evaluation methods that are used to determine the effectiveness of your agency's outreach.

There has been a significant increase in public interest regarding storm drain and ocean pollution. The apparent success of previous outreach efforts has enhanced the public's understanding of the storm drainage system. The increased public knowledge is evident during public events particularly with children who are exposed to storm water issues in school.

On the development side, construction crews are aware of the requirements placed by Public Works. They propose and install appropriate BMPs to handle storm water runoff. New or redevelopment projects are incorporating treatment train BMPs for their sites and applying low impact development ideas.

13. How would you modify the storm water public education program to improve it on the City or County level?

The City will work closer with the County to target a younger audience. Staff has found that outreach targeting children usually captures the parent as well. The City will continue to work with other agencies or groups to help eliminate stormwater pollution. Staff is also looking into social media sites such as Facebook and Twitter.

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**B. Industrial/Commercial Facilities Program (Part 4.C)**

**1. Critical Source Inventory Database**

Did you (individually or jointly) update the Database for Critical Sources Inventory?

Yes

No

Comments/Explanation/Conclusion:

The Critical Sources Inventory list is updated in two ways:

1. Annually, as part of the annual report process
2. Ongoing basis, as inspectors in the field observe new facilities that belong on the critical list based on SIC and as existing facilities close and are removed from the list. Additionally, the City reviews County Health Department’s database of restaurants.

**2. Inspection Program**

Provide the reporting data as suggested in the following tables.

Category	Initial Number of Facilities at the start of cycle proposed for inspection by categories (after the initial year, the updated number based on the new data)	Number of facilities inspected in the current reporting year	% Completed at the time of this report for present cycle (from the initial value, and from the updated value after first cycle)	Total number since permit adoption
Restaurant	0	0	0%	565
Automotive Services	0	0	0%	233
Industrial/Commercial	0	0	0%	458

Comments/Explanation/Conclusion:

The Critical Sources Inventory is a fluid database, with updates based on the addition of new businesses and removal of others, as well as changes in SIC that have been incorrectly reported or unreported. 100% of the correctly listed critical sources have been inspected twice during the permit. The City has hired a consultant to resume the inspection program, regardless of permit status. The next round of inspections will resume FY12-13 or FY13-14 with the new permit.

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**3. BMPs Implementation**

Provide the reporting data as suggested in the following table.

Category	Number of facilities inspected by category in this reporting year	Number of facilities identified as adequately implementing BMPs as specified in this reporting year	% adequately implementing out of total in this reporting year	Number of facilities required to implement or upgrade in this reporting year	Number of facilities inspected by category in this reporting cycle	Number of facilities identified as adequately implementing BMPs as specified in this reporting cycle	% adequately implementing out of total in this reporting cycle	Number of facilities required to implement or upgrade in this reporting cycle	Total Number during this permit adequately implementing	Total Number during this permit required to implement or upgrade
Restaurants	0	0	N/A	0	0	0	N/A	N/A	427	128
Automotive Services	0	0	N/A	0	0	0	N/A	N/A	173	75
Industrial/Commercial	0	0	N/A	0	0	0	N/A	N/A	364	43

Comments/Explanation/Conclusion:

As businesses become more familiar with the NPDES program, and the required BMPs that are to be implemented in their standard operating procedures, the level of compliance has increased. The next round of inspections will resume FY12-13 or FY13-14 with the new permit.

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**4. Enforcement Actions**

Provide the reporting data as suggested in the following table.

Enforcement Actions by categories (e.g. Warning letter, NOV, referral to D.A., etc.)	Number of facilities issued enforcement actions in the current reporting year	Number of facilities issued enforcement actions in the current reporting cycle	Number of facilities (re)inspected due to enforcement actions in current reporting year	Number of facilities (re)inspected due to enforcement actions in current reporting cycle	Number of facilities brought into compliance in the current reporting year	Number of facilities brought into compliance in current reporting cycle	Total number of enforcement actions since permit adoption (by category)
Verbal	0	44	0	44	0	44	85
NOV	0	0	0	0	0	0	31

Facilities by category	Number of Warning letters	Number of NOVs	Number of Referral	Number of Other
Restaurant	0	0	0	0
Automotive Services	0	0	0	0
Industrial/Commercial	0	0	0	0
Comments/Explanation/Conclusion:	Inspectors/City Staff attempt to use friendly facilitation methods in the form of educational materials, gentle reminders, and hands-on methods to encourage facilities to use appropriate BMPs in their everyday operations. Notices of Violations are sent when other methods fail to bring about the desired results.			

**5. Program Implementation Effectiveness Assessment**

Please give a brief assessment of the implementation of the program in removing pollutants from the storm water discharges. Please provide an explanation. Suggested improvements or adjustments based on the knowledge gained through this reporting period activity must be reflected in a change in the SQMP, if warranted.

Highly Effective

Somewhat Effective

Non Effective

Comments/Explanation/Conclusion:

The NPDES program is generally well received by the facilities on the critical sources inventory. Outreach materials distributed during routine site inspections help open discussion of necessary BMPs and the reason why those BMPs must be implemented. The inspection program is an effective tool to not only educate business owners/managers/staff about alternative BMPs, but to make sure that businesses are incorporating the appropriate BMPs into their standard operating procedures to maintain compliance with the NPDES program. In general, businesses respond well to requests for compliance.

**6. You must also submit a quarterly electronic submittal of your Industrial/Commercial Facilities Program activities. There were no Industrial/Commercial Facilities Program activities this fiscal year.**

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C. Development Planning Program (Part 4.D)

1. Does your agency have a process to minimize impacts from storm water and urban runoff on the biological integrity of natural drainage systems and water bodies in accordance with requirements under CEQA, Section 404 of the CWA, local ordinances, and other legal authorities? Attach examples showing how storm water quality impacts were addressed in environmental documents for projects over the past year. Yes  No
2. Does your agency have procedures to include the following requirements in all priority development and redevelopment projects:
  - b. Maximize the percentage of permeable surfaces to allow more percolation of storm water into the ground? Yes  No
  - c. Minimize the quantity of storm water directed to impermeable surfaces and the MS4? Yes  No
  - d. Minimize pollution emanating from parking lots through the use of appropriate treatment control BMPs and good housekeeping practices? Yes  No
  - e. Provide for appropriate permanent measures to reduce storm water pollutant loads from the development site? Yes  No
3. List the types and numbers of BMPs that your agency required for priority projects to meet the requirements described above.

- Treatment trains (pretreatment filter → infiltration/percolation to ground)  
Pretreatment filters consist of fossil bags/pouches, designed to filter expected pollutants
- Engineered planter boxes/strips (bio retention design); engineered to filter and hold a certain amount of runoff prior to discharging to public system

4. Describe the status of the development or implementation of peak flow controls in Natural Drainage Systems.

This task has been assigned to the County; the City will comply and implement as required in the Permit.

5. Has your agency amended codes and/or ordinances to give legal effect to the SUSMP changes required in the Permit? Yes  No

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6. Describe the process your agency uses to include SUSMP design standards in new development and redevelopment project approvals.

- Planning Division screens all proposed projects and refers all discretionary projects (including SUSMP projects and more) to the Engineering Division for review
- Grading and building permits are not issued until a SUSMP is approved.
- Final occupancy permit is not issued until all SUSMP measures have been implemented.

7. How many of each of the following projects did your agency review and condition to meet SUSMP requirements last year?

- |  |   |
|--|---|
| a. Residential   | 1 |
| b. Commercial  | 7 |
| c. Industrial  | 0 |
| d. Automotive Service Facilities   | 0 |
| e. Retail Gasoline Outlets   | 0 |
| f. Restaurants   | 0 |
| g. Parking Lots  | 0 |
| h. Projects located in or directly adjacent to or discharging directly to an environmentally sensitive area. | 0 |
| i. Total number of permits issued to priority projects   | 8 |

8. What is the percentage of total development projects that were conditioned to meet SUSMP requirements? 53 %

9. How has your agency prepared to reduce the SUSMP threshold for industrial/commercial facilities to 1 acre from 100,000 square feet in 2003?

The municipal code reflects this change; Engineering, Planning and Building Divisions' staff who review the site plans have been trained to recognize the new threshold.

10. After 2003, how many additional projects per year will require/did require implementation of SUSMP requirements as a result of the lower threshold? ~1-2

11. Does your agency participate in an approved regional or sub-regional storm water mitigation program to substitute in part or wholly SUSMP requirements for new development? Yes  No

12. Has your agency modified its planning procedures for preparing and reviewing CEQA documents to consider potential storm water quality impacts and provide for appropriate mitigation? Yes  No

If no, provide an explanation and an expected date of completion.

N/A

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13. Did your agency update any of the following General Plan elements in the past year?

- |                 |                              |  |
|-----------------|------------------------------|--|
| a. Land Use     | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| b. Housing      | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| c. Conservation | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| d. Open Space   | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

If yes, please describe how watershed and storm water quality and quantity management considerations were included:

N/A

- |   |   |
|---|---|
| 14. How many targeted staff were trained last year?   | 42  |
| 15. How many targeted staff are trained annually?   | 90  |
| 16. What percentage of total staff are trained annually?  | 47%   |
| 17. Has your agency developed and made available development planning guidelines?   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| 18. If no, what is the expected date that guidelines will be developed and available to developers?                       | N/A   |
| 19. What is the status of completion of the technical manual for siting and design of BMPs for the development community? |   |

Los Angeles County has developed the technical siting manual. The City uses this technical manual.

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D. Development Construction Program (Part 4.E)

1. Describe your agency’s program to control runoff from construction activity at all construction sites within its jurisdiction.

- Written certification indicating that a NOI has been filed; “receipt of NOI, WDID#” letter issued by the State Board is requested
- Copy of their submitted SWPPP
- Local SWPPP that is as stringent as the state SWPPP (for all sites 0.25 acre or larger)
- PW inspector will inspect to verify LSWPPP is implemented properly

2. Does your agency require the preparation, submittal, and implementation of a Local Storm Water Pollution Prevention Plan (Local SWPPP) prior to the issuance of a grading permit for all sites that meet one or all of the following criteria?

- a. Will result in soil disturbance of one acre or greater      Yes       No
- b. Is within, directly adjacent to, or is discharging directly to an environmentally sensitive area      Yes       No
- c. Is located in a hillside area      Yes       No

3. Attach one example of a local SWPPP

4. Describe the process your agency uses to require proof of filing a Notice of Intent for coverage under the State General Construction Activity Storm Water permit and a certification that a SWPPP has been prepared prior to issuing a grading permit?

Contractor must provide a WDID, a copy of the NOI receipt letter from the State Board, and a Local SWPPP, which must be as stringent as the State SWPPP.

5. How many building/grading permits were issued to sites requiring Local SWPPPs last year? 5

6. How many building/grading permits were issued to sites requiring coverage under the General Construction Activities Storm Water Permit last year? 2

7. How many building/grading permits were issued to construction site less than one acre in size last year? 674

8. How many construction sites were inspected during the last wet season? 5

9. Complete the table below.

Type of Violation	# of Violations	% of Total Inspections	# of Follow-up Inspections	# of Enforcement Actions
Off-site discharge of sediment	0	0%	0	0
Off-site discharge of other pollutants	0	0%	0	0
No or inadequate SWPPP	1	20%	1	0
Inadequate BMP/SWPPP implementation	1	20%	1	0

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10. Describe the process for taking enforcement actions against construction site violations, including the types of actions that are taken.

PW inspectors daily inspect active construction sites. In addition, the public and other staff may report violations. Any reports will be investigated by the PW inspector and/or Stormwater Manager. An inspection will be conducted and the LSWPPP will be reviewed.

Staff will work with the developer to ensure compliance. A follow-up inspection will be completed. If violations still exist, a written violation letter will be issued to the developer. If the violation is not corrected after the letter has been issued, Code Enforcement will be contacted and a cease & desist order may be issued by Building and Safety to halt all work until the violation is corrected.

If violations continue and the developer refuses to comply with the City's instructions, then the case may be referred to the Regional Board and City Attorney's office.

11. Describe the system that your agency uses to track the issuance of grading permits.

The City uses a software program called Permits Plus which coordinates the construction requirements of Public Works, Building & Safety, Planning, and Fire.

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E. Public Agency Activities (Part 4.F)

1. Sewage System Maintenance, Overflow, and Spill Prevention (only applicable to agencies that own and/or operate a sanitary sewer system)

- a. Has your agency developed and implemented a response plan for sanitary sewer overflows that includes the requirements in Order 01-182? Yes  No
- b. How many sanitary sewer overflows occurred within your jurisdiction? 4
- c. How many did your agency respond to? 4
- d. Did your agency investigate all complaints received? Yes  No
- e. How many complaints were received? 4
- f. Upon notification, did your agency immediately respond to overflows by containment? Yes  No
- g. Did your agency notify appropriate sewer and public health agencies when a sewer overflowed to the MS4? Yes  No
- h. Did your agency implement a program to prevent sewage spills or leaks from sewage facilities from entering the MS4? Yes  No

If so, describe the program:

Public Works developed and implements a Sewer System Management Plan (SSMP). All sewage complaints are responded to within 24 hours or less. Leaks or spills are responded to immediately. The Sewer Maintenance Crew physically contains the SSO and divert/block the SSO from entering the storm drain system. They vacuum the exposed sewage and return it to the sewer system. All required agencies are notified accordingly should an SSO occur.

The industrial waste (FOG) program requires restaurants to install grease traps, to minimize possibility of blockage due to grease build-up.

- i. Did your agency implement a program to identify, repair, and remediate sanitary sewer blockages, exfiltration, overflow, and wet weather overflows from sanitary sewers to the MS4? Yes  No

If so, describe the program:

The Sewer Maintenance staff performs routine evaluation of the sewer lines for maintenance purposes once or twice a year. The Environmental Programs and Operations Division also implements the FOG (Fats, Oils, and Grease) Program, which includes routine inspection of restaurants to evaluate proper installation and operation of grease traps, and performs enforcement when necessary (contracted to County of Los Angeles).

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2. Public Construction Activities Management

- a. What percentage of public construction sites 5 acres or greater in size did your agency obtain coverage under the State of California General Construction Activities Storm Water Discharge Permit? 100%

b. Give an explanation for any sites greater than 5 acres that were not covered:

N/A

- c. What is the total number of active public construction site? 0  
How many were 5 acres or greater in size? 0

d. (After March, 2003) Did your agency obtain coverage under the State of California General Construction Activities Storm Water Discharge Permit coverage for public construction sites one acre or greater? Yes  No

3. Vehicle Maintenance/Material Storage Facilities/Corporation Yards Management

a. Did your agency implement pollution prevention plans for each public vehicle maintenance facility, material storage facility, and corporation yard? Yes  No

Yes, transfer station, transportation facility, police and fire station lots have implemented pollution prevention plans.

- b. Briefly describe how your agency implements the following, and any additional, BMPs to minimize pollutant discharges in storm water.
  - (1) Good housekeeping practices
  - (2) Material storage control
  - (3) Vehicle leaks and spill control
  - (4) Illicit discharge control

City staff are regularly trained to implement good housekeeping, spill control and response, material storage, and IC/ID BMPs. The SWPPPs for the various City-owned facilities reference these BMPs to ensure proper BMP implementation.

Inspections are performed by staff to ensure compliance at the City facilities. Departments that contract out maintenance work contact the City storm water program manager to make sure the scope of services is consistent with NPDES requirements.

Materials are stored indoors or have appropriate BMPs to prevent spills.

Vehicles are maintained and washed at the Transportation Facility; wash water is clarified onsite. All leak repairs and other maintenance activities are conducted indoors. Above ground storage has proper containment and spill prevention.

Illicit discharges are responded to, contained and cleaned promptly.

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- c. Are all Permittee owner and/or operated vehicle/equipment wash areas self-contained, covered, equipped with a clarifier, and properly connected to the sanitary sewer? Yes  No   
If not, what is the status of implementing this requirement?

N/A

- d. How many Permittee owned and/or operated vehicle/equipment wash areas are scheduled to be redeveloped to include the BMPs listed above?

None.

4. Landscape and Recreational Facilities Management

- a. Has your agency developed a standardized protocol for the routine and non-routine application of pesticides, herbicides (including pre-emergents), and fertilizers? Yes  No   
Briefly describe this protocol:

Landscaping activities in which these materials must be used are performed in a manner that minimizes exposure to storm water or urban runoff. This protocol is designed to follow the Permit and the Public Agency Model Program.

- b. How does your agency ensure that there is no application of pesticides or fertilizers immediately before, during, or immediately after a rain event or when water is flowing off the area to be applied?

All application is performed by or under the supervision of a qualified pesticide applicator, which ensures proper application conditions.

- c. Are any banned pesticides, herbicides, fungicides, or rodenticides stored or applied in your agency's jurisdiction that you know of? Yes  No   
If so, list them:

N/A

5. Storm Drain Operations and Management

- a. Did your agency designate catch basin inlets within its jurisdiction as Priority A; Priority B; and Priority C? Yes  No   
b. How many of each designation exist in your jurisdiction?  
Priority A: 10  
Priority B: 0  
Priority C: 120  
c. Is your city subject to a trash TMDL? Yes  No

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- d. If yes, describe the activities and/or implementation measures that your agency conducted pursuant to the TMDL and any other trash reduction efforts that occurred.

City has an aggressive street sweeping and catch basin cleaning program. City has prioritized catch basins, worked with LA County Watershed Division to install catch basin inserts at various locations. Two CDS units are operating; one has been constructed at Overland Avenue and Ballona Creek (with a grant from the Coastal Conservancy in cooperation with the Santa Monica Bay Restoration Commission) while the other one is located at Lucerne and Ince. Both of these CDS units were installed and as part of the County's Baseline study for the Ballona Creek Trash TMDL.

The City is currently installing 672 catch basin full capture devices. The Proposition 50 grant will fund the BMPs. The City also received \$485,000 in Federal appropriations to retrofit the remaining 162 catch basins. Also, about 50 trash bins and 45 recycling bins are expected to be placed in high trash generation areas such as downtown, school, and in front of convenience stores to help prevent littering. This is also being funded through Proposition 50, Ch. 5.

- |  |              |
|--|--------------|
| e. How many times were all Priority A basins cleaned last year?  | 1            |
| f. How many times were all Priority B basins cleaned last year?  | N/A          |
| g. How many times were all Priority C basins cleaned last year?  | 0            |
| h. How much total waste was collected in tons from catch basin clean-outs last year?   | See i. below |
| i. Attach a record of all catch basins in your jurisdiction. This shall identify each basin as City or County owned, and Priority A, B, or C. For all basins that are owned and operated by your agency, include dates that each was cleaned out over the past year. |              |

The City contracts with the County for annual maintenance of the catch basins. All cleaning records can be found with the County's records. The City's own Street & Sewer crews will clean a catch basin periodically on an as needed basis.

- |   |   |                             |
|---|---|-----------------------------|
| j. Did your agency place and maintain trash receptacles at all transit stops within its jurisdiction.                                       | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| k. How many new trash receptacles were installed last year?   | 0                                       |                             |
| l. Did your agency place special conditions for events that generated substantial quantities of trash and litter including provisions that: |   |                             |
| (1) Provide for the proper management of trash and litter generated from the event?   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (2) Arrange for temporary screens to be placed on catch basins?   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) Or for catch basins in that area to be cleaned out subsequent to the event and prior to any rain?                                       | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

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- m. Did your agency inspect the legibility of the catch basin stencil or labels? Yes  No   
 What percentage of stencils were legible? 100 %
- n. Were illegible stencils recorded and re-stenciled or re-labeled within 180 days of inspection? Yes  No
- o. Did your agency visually monitor Permittee-owned open channel storm drains and other drainage structures for debris at least annually and identify and prioritize problem areas of illicit discharge for regular inspection? Yes  No   
 Is the prioritization attached? Yes  No

No prioritization is necessary as there is no City owned open channel. The County of LA and the US Army Corps of Engineers also maintains a section of Ballona Creek. City maintenance crews are available to assist the County and Army Corps as needed.

- p. Did your agency review its maintenance activities to assure that appropriate storm water BMPs are being utilized to protect water quality? Yes  No   
 What changes have been made?

Maintenance procedures have proven to be effective using storm water BMPs, and no changes are necessary at this time.

- q. Did your agency remove trash and debris from open channel storm drains a minimum of once per year before the storm season? Yes  No

County performs this service for Ballona Creek since they own the storm drain system; however, Culver City does participate in the annual Ballona Creek clean up hosted by Heal the Bay.

- r. How did your agency minimize the discharge of contaminants during MS4 maintenance and clean outs?

Trash and debris are cleaned out from storm drain catch basins using vacuum trucks and by hand. Debris is not allowed to enter the outlet pipes during cleaning. The materials collected from storm drains and/or catch basins cleaning are transported to the City's Transfer Station for transport to a local landfill.

- s. Where is removed material disposed of?

Sanitary landfill.

**6. Streets and Roads Maintenance**

- a. Did your agency designate streets and/or street segments within its jurisdiction as one of the following:
- (1) Priority A – streets and/or street segments that are designated as consistently generating the highest volumes of trash and/or litter? Yes  No
- (2) Priority B – streets and/or street segments that are designated as consistently generating moderate volumes of trash and/or litter? Yes  No

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- (3) Priority C – streets and/or street segments that are designated as consistently generating low volumes of trash and/or litter? Yes  No
  - b. Did your agency perform all street sweeping in compliance with the permit and according to the schedule:
    - (1) Priority A – These streets and/or street segments shall be swept at least two times per month? Yes  No
    - (2) Priority B – Each Permittee shall ensure that each streets and/or street segments is cleaned at least once per month? Yes  No
    - (3) Priority C – These streets and/or street segments shall be cleaned as necessary but in no case less than once per year? Yes  No
  - c. Did your agency require that saw cutting wastes be recovered and disposed of properly and that in no case shall waste be left on a roadway or allowed to enter the storm drain? Yes  No
  - d. Did your agency require that concrete and other street and road maintenance materials and wastes be managed to prevent pollutant discharges? Yes  No
  - e. Did your agency require that the washout of concrete trucks and chutes only occur in designated areas and never into storm drains, open ditches, streets, or catch basins leading to the storm drain system? Yes  No
  - f. Did your agency train its employees in targeted positions (whose interactions, jobs, and activities affect storm water quality) regarding the requirements of the storm water management program to:
    - (1) Promote a clear understanding of the potential for maintenance activities to pollute storm water? Yes  No
    - (2) Identify and select appropriate BMPs? Yes  No
- 7. Parking Facilities Management
  - a. Did your agency ensure that Permittee-owned parking lots be kept clear of debris and excessive oil buildup and cleaned no less than 2 times per month and/or inspected no less than 2 times per month to determine if cleaning is necessary. Yes  No
  - b. Were any Permittee-owned parking lots cleaned less than once a month? Yes  No   
How many? N/A

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8. Public Industrial Activities Management
- a. Did your agency, for all municipal activity considered an industrial activity under USEPA Phase I storm water regulations, obtain separate coverage under the State of California General Industrial Activities Storm Water Discharge Permit no later than December 31, 2001? Yes  No
- b. Does your agency serve a population of less than 100,000 people? Yes  No
9. Emergency Procedures
- a. In case of real emergencies, did your agency repair essential public services and infrastructure in a manner to minimize environmental damage? Yes  No
- b. Were BMPs implemented to the extent that measures did not compromise public health and safety? Yes  No
10. Feasibility Study
- a. Did your agency cooperate with the County Sanitation Districts of Los Angeles County to prepare a study which investigates the possible diversion of dry weather flows or the use of alternative treatment control BMPs? Yes  No
- b. Did your agency review its individual prioritized list and create a watershed based priority list of drains for potential diversion and submit a listing of priority diversions to the Regional Board Executive Officer? Yes  No

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- F. Illicit Connections and Illicit Discharges (IC/ID) Elimination Program (Part 4.G)
1. Attach a copy of your agency's IC/ID Elimination Implementation Program (Part 4.G.1.a.).
  2. Attach a map of your storm drain system showing all permitted connections (if available), and the locations of all illicit connections and discharges that occurred last year (Part 4.G.1.b). If your agency has not completed this requirement, describe the status of the development of a baseline map, including an expected completion date.

The County has taken the lead in mapping all illicit connections and discharges. A map of the City's storm drain system has been developed. There are no "permitted" connections (those needing a written permit) for the system.

3. Describe your enforcement procedures for eliminating illicit discharges and terminating illicit connections.

The City has actively responded to citizens or other complaints regarding storm water or urban runoff pollution. In addition, illicit discharges and connections are actively investigated through the business inspection program. Surveillance is routinely conducted in selected areas of the City during both dry and wet weather for potential violations. Once a connection or discharge has been identified, violators are given thirty (30) days to demonstrate compliance with the order to cease illegal activity. Should such activities be present at subsequent site inspections; second and third notices of violations may be sent. Cooperation of other departments is sought in cases that have a long history of violations.

4. Describe your record keeping system to document all illicit connections and discharges.

Records for illicit connection and discharges are kept in an electronic database. Each record has background information, witness information, a completed report, pictures, and follow-up schedule. Investigation is closed after three months if no discharges are observed after initial violation.

5. What is the total length of open channel that your agency owns and operates? 0
6. What length was screened last year for illicit connections? N/A
7. What is the total length of closed storm drain that your agency owns and operates? ~5 miles
8. What length was screened last year for illicit connections? 0

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9. Describe the method used to screen your storm drains.

Video-screening for part of the City with large clusters of business establishments; staff visual observation for flows in manhole. Catch basin maintenance crew will report any suspected illicit connections/discharges that are visually observed.

10. Provide the reporting data for illicit connections as suggested in the following table (you may submit a spreadsheet from your database that contains the information).

Year	Total # reported/ identified	Total # investigated	# that conveyed exempt discharges or NPDES permitted	# that conveyed illicit discharges that were terminated	# that were removed	# that resulted in enforcement action	# that resulted in <i>other</i> actions
01/02	0	N/A	N/A	N/A	N/A	N/A	N/A
02/03	0	N/A	N/A	N/A	N/A	N/A	N/A
03/04	0	N/A	N/A	N/A	N/A	N/A	N/A
04/05	0	N/A	N/A	N/A	N/A	N/A	N/A
05/06	0	N/A	N/A	N/A	N/A	N/A	N/A
06/07	0	N/A	N/A	N/A	N/A	N/A	N/A
07/08	0	N/A	N/A	N/A	N/A	N/A	N/A
08/09	0	N/A	N/A	N/A	N/A	N/A	N/A
09/10	0	N/A	N/A	N/A	N/A	N/A	N/A
10/11	1	1	0	1	1	1	0
11/12	0	N/A	N/A	N/A	N/A	N/A	N/A

11. Explain any other actions that occurred in the last year.

None.

12. What is the average time it takes your agency to initiate an illicit connection investigation after it is reported? < 24 hours

When an illicit connection is identified, the catch basin maintenance crew would investigate the problem in less than 24 hours, or forward the problem to the County, depending on the jurisdiction.

a. Were all identified connections terminated within 180 days? Yes  No

b. If no, explain why.

N/A

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13. Provide the reporting data for illicit discharges as suggested in the following table (you may submit a spreadsheet from your database that contains this information)

Year	Total # reported	Total # that were discontinued/ cleaned up voluntarily through enforcement and the source was identified	# that were cleaned up but the source could not be identified	# that resulted in no evidence of discharge	# that were determined to be conditionally exempt	# that were exempt or in compliance and the source identified	# that resulted in enforcement action
01/02	1	1	0	0	0	0	0
02/03	7	7	0	0	0	0	0
03/04	2	2	0	0	0	0	2
04/05	5	4	0	1	0	0	3 (NOV) 1 (Verbal)
05/06	3	2	0	1	0	0	1
06/07	6	6	0	6	0	0	1
07/08	6	6	0	0	0	0	1 (NOV) 5 (Verbal)
08/09	10	7	1	2	0	0	6 (NOV) 4 (Verbal)
09/10	11	11	0	0	0	0	11 (Verbal)
10/11	33	33	0	0	0	0	33 (Verbal)
11/12	4	4	0	0	0	0	0

14. What is the average response time after an illicit discharge is reported? < 24 hours  
 a. Did any response times exceed 72 hours? Yes  No   
 b. If yes, explain why.

N/A

15. Describe your agency's spill response procedures.

When a spill is discovered an interdepartmental email is sent out so all those that need to be involved are informed. A multi-departmental investigation is launched immediately. An inspector reports to the site and then determines whether other departments and agencies or actions are required (e.g. Hazardous Materials Unit, Vacuum Trucks, Street Maintenance, Fire, etc.). Dischargers are issued NOVs and clean up orders are issued, when appropriate.

16. What would you do differently to improve your agency's IC/ID Elimination Program?

Hire more staff or expand consultant services to perform more routine inspections, especially in areas of concern.

17. Attach a list of all permitted connections to your storm sewer system.

Typically, the City permits indirect connections to the storm drain system to provide proper drainage of projects within the plan review and approval process. The City does not permit any individual connections to the storm drain system. If the applicant

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requires a direct connection to a LACDPW facility/system, then they must provide proof of a connection permit from LACDPW prior to issuance of a Building Permit.

## V. Monitoring

Briefly describe any storm water monitoring activities that are not required by Order No. 01-182 that your municipality conducted, participated in, or received funding to conduct in the past fiscal year. These activities should correspond with the dollar amount you listed in Table 2.

Storm water monitoring activities that were completed were done for compliance with the General Industrial Activities Stormwater Permit.

## VI. Assessment of Program Effectiveness

A. Attach a summary of the effectiveness of your storm water management program. This summary should include, at a minimum, the following:

1. An assessment of your agency's compliance with permit requirements based on your responses to the questions in this form;

The City has been in compliance with the Permit and will continue to improve all aspects of the program. The City is also ready to implement the new Permit when it is drafted and approved.

2. Descriptions of any evaluation methods that your agency uses to determine the effectiveness of your storm water management program;

Discussions with other departmental staff are opportunities to gauge their understanding of storm water and water quality issues. Another effective method is to have staff from various departments compile and report information pertaining to the Annual Report, and by doing so, will make it clear how other departments have been complying with storm water regulations.

3. A summary of the strengths and weaknesses of your agency's storm water management program;

The strength of the program lies in the management members and the City Council that are supportive of water quality protection issues which allows a smooth implementation of the program. Inter-division/department coordination has improved drastically.

The only weakness is training of staff on the relevant sections of the permit. Certain group needs to understand GIASP regulations while others would need to comply with the MS4 general permit.

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4. A list of specific program highlights and accomplishments;

- Moving forward with Prop 50 grant implementation. City staff is working with staff from the Santa Monica Bay Restoration Commission to complete the task of installing full capture catch basin devices, rain gardens, downspout disconnects, and placement of trash/recycling bins in high trafficked areas.
- There is better coordination between departments in terms of planning and building.
- All mandated inspections are completed (twice within Permit's cycle); however, the City has hired a consultant to perform stormwater inspections and will continue to inspect when the new Permit is adopted.
- Staff attends all TMDL and NPDES related meetings to offer their insight and suggestions for the monitoring plan and the implementation plan.

5. A description of water quality improvements or degradation in your watershed over the past fiscal year;

Water quality monitoring is performed by the County of LA; however, Culver City requires stringent BMPs for all types of construction. Treatment BMPs, ICID elimination program, and good housekeeping practices continue to improve water quality.

6. Interagency coordination between cities to improve the storm water management program;

City of Culver City works with City of Beverly Hills, City of West Hollywood, and City of Los Angeles on TMDL meetings, watershed meetings, Used Oil Programs, recycling programs, and sustainability programs, water conservation and smart irrigation (West Basin Municipal Water District).

7. Future plans to improve your agency's storm water management program; and

The City will have more outreach events and publications to offer awareness of the program. More BMPs are set to be installed in the near future to help with pollutants. Staff will receive new training on current and future changes to the NPDES permits.

8. Suggestions to improve the effectiveness of your program or the County model programs.

The County's programs are being updated in preparation for the new Permit. As their model programs changes, the City will evaluate the changes and update our program as necessary.

B. On a scale of 1 to 10 (10 being full implementation of requirements by their deadlines), rate your municipality's level of compliance with Order No. 01-182.

10
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C. List any suggestions your agency has for improving the program reporting and assessment.

Allow Permittees to fill out the annual report online, section by section. Revise questions that are too vague or are not of significant importance.