

## Program Effectiveness Summary

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

**Response:** As mentioned in previous reports, the City believes it has implemented each of the program tasks associated with the current and previous municipal NPDES permit. It must be presumed, therefore, that so doing has resulted in program effectiveness desired by the regional board. The municipal NPDES permit is a process-oriented regulation. If all of the tasks are performed, it must be concluded that runoff pollution has been reduced and water quality has been improved to some extent.

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

**Response:** Once again, in the absence of objective criteria, the City must conclude that its storm water management program is effective. It should be noted that unlike the General Industrial Activity Storm Water Permit, the municipal NPDES permit is not an iterative-oriented permit, based on a “storm water management by objectives approach (i.e., an approach that would allow permittees to determine how to achieve a particular water quality objective). It is the permit, as written by the regional board, which determines what level of compliance is required to meet water quality standards or objectives.

3. A summary of the strengths and weaknesses of the City's storm water management program.

**Response:** As reported last year, the City cannot make a determination as to whether its regional board-mandated storm water management program is strong or weak. Once again, it is a program that has been developed by the regional board for implementation by permittees that can only be objectively evaluated through storm water and non-storm water monitoring data. Because the City has implemented the requisite program tasks, it must be concluded that its storm water management program is at least adequate.

4. A list of specific program highlights and accomplishments.

**Response:**

- The City has endeavored to meet the trash TMDL for Ballona Creek by installing several types of catch basin-resident debris excluders – controls that should minimize the entry of trash to Ballona Creek and bacteria contained in fecal matter. The City is confident that it is meeting the current numeric trash TMDL target.

- The City has prepared new public education outreach brochures addressing a variety of activities that have the potential for generating urban runoff pollution.
  - The City applied for and was approved for a grant from the Santa Monica Bay Restoration Commission for the installation of 205 inserts for trash collection in catch basins leading to Ballona Creek.
5. A description of water quality improvements or degradation in your watershed over the past fiscal year.

**Response:** The City knows of no degradation that has occurred either in Ballona Creek or Dominguez Channel over the past year.

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

**Response:** The Dominguez Channel and Ballona Creek watershed management committees continue to coordinate efforts among affected permittees to improve the City's storm water management program by providing important compliance related information. The City of Los Angeles have also been extremely helpful in providing leadership in directing the City and other members of jurisdiction 8 towards compliance with the trash, bacteria, and toxics TMDLs.

7. Future plans to improve the City's storm water management program.

**Response:** Work towards minimizing non-storm water discharges that operate to transport bacteria and other pollutants to the MS4.

8. Suggestions to improve the effectiveness of the City's program or the County model programs.

**Response:** An improvement in program effectiveness should result once the new MS4 permit is reissued. The conclusion is based on the City's review of the Ventura County MS4 permit, which was adopted in May of 2009. Notwithstanding some of the issues the City has with the Ventura MS4 permit in terms of its revised post-construction runoff pollution mitigation plan requirements, the Ventura permit is clearer with respect to BMPs required for several development construction project categories.

## **B. Self Assessment**

**Response:** Because the City has fully implemented all of the requirements of the Los Angeles County MS4 permit, it must rate itself a 10.

### **C. Suggestions for Improving Program Reporting and Assessment**

**Response:** This task should be worked on collectively by members of WMC. It should be noted that the County deserves substantial credit for developing an on-line reporting system that significantly streamlined the annual report completion and submittal process. It would also be helpful if the annual report for the next MS4 permit is abbreviated to include only relevant information.