

**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.

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

This Report Form consists of the following sections:

SECTION	PAGE
I. Program Management	2-4
II. Receiving Water Limitations	5
III. SQMP Implementation	5-7
IV. Special Provisions	8
IV.A. Public Information and Participation Program	8-14
IV.B. Industrial/Commercial Facilities Program	15-17
IV.C. Development Planning Program	18-21
IV.D. Development Construction Program	22-23
IV.E. Public Agency Activities Program	24-33
IV.F. IC/ID Elimination Program	34-37
V. Monitoring	38
VI. Assessment of Program Effectiveness	38
VII. Certification	39

Los Angeles County Municipal Storm Water Permit (Order 01-182)

Individual Annual Report Form

Attachment U-4

Reporting Year 2011- 2012

I. Program Management

Permittee Name:	City of San Fernando	
Permittee Program Supervisor:	Ron Ruiz	
Title:	Director of Public Works	
Address:	117 McNeil Street	
City:	San Fernando	Zip Code: 91340
Phone:	(818) 898-1222	Fax: (818) 365-8090
<p>A. 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.</p>		
<p>The Department of Public Works continues to be the lead department for implementing the NPDES program.</p>		

TABLE 1 - Program Management

Storm Water Management Activity	Division/Department	# of Individuals Responsible for Implementing
1. Outreach & Education	Public Works	1
2. Industrial/Commercial Inspections	Contractor	1
3. Construction Permits/Inspections	Building & Safety	1
4. IC/ID Inspections	Public Works Coordinator	2
5. Street sweeping	Contractor	2
6. Catch Basin Cleaning	Contract to County of Los Angeles	2
7. Spill Response	Public Works	2
8. Development Planning (project/SUSMP review and approval)	Building & Safety and Planning	2

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

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. Classroom-style training was provided to staff impacted development planning, development construction, illicit connection/discharge detection and elimination, and public agency programs (see upload)

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.

General fund, supported partially by sewer funds used for sewer system overflows and other related tasks.

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.

None

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

TABLE 2

Program Element	Expenditures in Previous Fiscal Year	Estimated Amount Needed to implement Order 01-182
1. Program management a. Administrative costs b. Capital costs	\$23,639	\$25,000
2. Public Information and Participation a. Public Outreach/Education b. Employee Training c. Corporate Outreach d. Business Assistance	\$2,630	\$5,000 \$5,000
3. Industrial/Commercial inspection/ site visit activities	\$53,560	None at this time (task was completed several years ago)
4. Development Planning	\$12,875	\$15,000
5. Development Construction a. Construction inspections	\$6,180	\$10,000
6. Public Agency Activities a. Maintenance of structural and treatment control BMPs b. Municipal street sweeping c. Catch basin cleaning d. Trash collection/recycling e. Capital costs f. Other	\$19,261 \$127,431 \$132,870 \$815,384	\$20,000 \$129,000 \$135,000 \$820,000
7. IC/ID Program a. Operations and Maintenance b. Capital Costs	\$36,050	\$8,000
8. Monitoring	\$23,639	\$10,000
9. Other		\$20,000
10. TOTAL	\$1,253,519	\$1,202,000

List any supplemental dedicated budgets for the above categories:

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

Program management, annual report preparation, and annual staff training.

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

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 local SQMP was developed several years ago.

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

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

See uploaded BMP survey.

- E. Watershed Management Committees (WMCs)

- 1. Which WMC are you in? [Los Angeles River](#)
- 2. Who is your designated representative to the WMC? [Ron Ruiz or his designee](#)
- 3. How many WMC meetings did you participate in last year? 4
- 4. Describe specific improvements to your storm water management program as a result of WMC meetings.

As mentioned last year, the meetings have not resulted in significant improvements to the City's SQMP. The SQMP has been in effect since 2002. During this time, it has pretty much peaked. Impacted City staff now has an excellent understanding of development construction and, most of all, development planning/SUSMP programs. This will, no doubt, facilitate the implementation of low impact development (LID) requirements under the next MS4 permit. The primary benefit of watershed/sub-watershed meetings is the exchange of information among permittees concerning compliance and policy issues.

- 5. Attach any comments or suggestions regarding your WMC.

- 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.

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

- 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.

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

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? **112**

b) How many storm drain inlets were marked with a no dumping message in the last fiscal year? **112**

c) What is the total number of storm drain inlets that are legibly marked with a no dumping message? **112**

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

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? **The City has none.**

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

N/A

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

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? N/A
- c) Is this information listed in the government pages of the telephone book? N/A 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? 0
- g) Describe the process used to respond to hotline calls.

Upon receipt of a complaint, the City assigns the call to an inspector who will generally respond within 24 hours and take appropriate action.
- h) Have you provided the Principal Permittee with your current reporting contact information? Yes No
- i) Have you compiled a list of the general public reporting contacts for all Permittees and posted it on the www.888CleanLA.com web site (Principal Permittee only)? Yes No
 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)

Los Angeles County Municipal Storm Water Permit (Order 01-182)

Individual Annual Report Form

Attachment U-4

- 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? **All 4 quarterly meetings**

Explain why your agency did not attend any or all of the organized meetings.

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

Although the meetings over the past permit year have been extremely informative and helpful, they did not produce new outreach materials.

List suggestions to increase the usefulness of quarterly meetings:

The quarterly meetings have been informative but no suggestions for improvement are needed since the Principal Permittee will no longer be responsible for this task under the next MS4 permit.

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

- 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?

Please refer to the Principal Permittee's annual report in response to this question.

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

The City notified all schools within its jurisdiction, informing them of the Environmental Defenders Program and encouraging school administrators to take advantage of it.

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

- 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)* Yes No
If not, explain why.

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)*.

N/A

For Permit Years 2-5, attach an assessment of the effectiveness of in-school storm water education programs.

- g) What is the behavioral change target that was developed based on sociological data and other studies *(Principal Permittee only)*?

N/A

If no target has been developed, explain why and describe the status of developing a target.

N/A

What is the status of meeting the target by the end of Year 5?

N/A

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

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.

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? – **Not County-related** Yes No

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

N/A

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

If not, describe measures that will be taken to fully implement this requirement.

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

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.

N/A

- 6. Did you encourage local radio stations and newspapers to use public service announcements? Yes No
How many media outlets were contacted? **City contacted none. The County assumed responsibility for this task.**
Which newspapers or radio stations ran them? **Please refer the County's response.**

Who was the audience?

- 7. Did you supplement the County's media purchase by funding additional media buys? Yes No
Estimated dollar value/in-kind contribution: **none**
Type of media purchased: **none**
Frequency of the buys: **none**
Did another agency help with the purchase? **N/A** Yes No
- 8. Did you work with local business, the County, or other Permittees to place non-traditional advertising? **N/A** Yes No
If so, describe the type of advertising.

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

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:

Who were the key partners? N/A

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

N/A

10. Did you participate in or publicize workshops or community events to discuss storm water pollution? Yes No
How many events did you attend? none

11. Does your agency have a website that provides storm water pollution prevention information? Yes No
If so, what is the address? <http://www.ci.san-fernando.ca.us>

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.

It might be assumed that because of the attention that runoff pollution has been getting in the general press, together with the City's public information program outreach efforts, sensitivity to this environmental concern has increased. This was validated by the results of a survey that was conducted by the Principal Permittee.

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

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

The next MS4 permit calls for a public education program that is watershed-based. It will focus on TMDL pollutants specific to the Los Angeles River watershed.

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

Attachment U-4

B. Industrial/Commercial Facilities Program

1. Critical Source Inventory Database

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

Yes No

Comments/Explanation/Conclusion:

This task was completed prior June of 2006.

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
Landfills	N/A	N/A	N/A	N/A
TSDf	N/A	N/A	N/A	N/A

Comments/Explanation/Conclusion:

3. BMPs Implementation

Provide the reporting data as suggested in the following table.

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

Attachment U-4

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
Landfills	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
...	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

Comments/Explanation/Conclusion:

4. Enforcement Activities

Provide the reporting data as suggested in the following tables.

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)
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Facilities by category	Number of Warning letters	Number of NOVs	Number of Referral	Number of Other
N/A	N/A	N/A	N/A	N/A

Comments/Explanation/Conclusion:

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

Attachment U-4

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 activities must be reflected in a change in the SQMP, if warranted.

Highly Effective

Somewhat Effective

Non-effective

Comments/Explanation/Conclusion:

Without outfall monitoring or other “objective” data available, it must be presumed that the inspection program has been effective in reducing pollutants to the MS4. This is especially true of the industrial inspection program. These facilities are required under federal stormwater regulations to obtain an NPDES permit. The City has assisted the Regional Board in this regard by identifying facilities that require General Industrial Activity Stormwater Permits (GIASWPs). GIASWPs require the preparation of a SWPPP and a monitoring program plan. The Regional Board should be able to determine, better than the City, the extent to which these “covered” facilities have reduced pollutants to the MS4. The commercial inspection program must also be presumed to be effective in reducing pollutants associated with automotive, restaurant, and-RGO related activities. Overall, the inspection program has resulted in the distribution of materials containing BMPs and the City’s ordinance relative to BMP implementation and prohibition against illicit discharges. Enforcement of these requirements has resulted in significant compliance. Therefore, the City can only conclude that such compliance has resulted, to some extent, on a reduction of pollutants to the MS4.

6. You must also submit a quarterly electronic submittal of your Industrial/Commercial Facilities Program activities.
N/A

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

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? Yes No

Attach examples showing how storm water quality impacts were addressed in environmental documents for projects over the past year. [The City's CEQA check list, which is actually the standard used by all permittees, was submitted with last year's annual report. When a CEQA project comes to the City, it is evaluated for potential storm water impacts using development construction and development planning/SUSMP and activity specific project guidelines.](#)

2. Does your agency have procedures to include the following requirements in all priority development and redevelopment projects:

- a) Maximize the percentage of permeable surfaces to allow more percolation of storm water into the ground? Yes No

- b) Minimize the quantity of storm water directed to impermeable surfaces and the MS4? Yes No

- c) Minimize pollution emanating from parking lots through the use of appropriate treatment control BMPs and good housekeeping practices? Yes No

- d) 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.

[See uploaded BMP survey.](#)

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

[Generally, any project sited in an area that drains into an unlined conveyance is required to assure that post-construction runoff co-efficient or Q does not exceed the pre-development runoff co-efficient or Q.](#)

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

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

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

All development projects undergo an evaluation process to determine if they are subject to SUSMP requirements and to what extent, based on the type of subject development or redevelopment project. Once the evaluation is conducted, BMP conditions are assigned to the project applicant. A check list and instructions for complying with SUSMP requirements has been used for several years now.

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

- a) Residential 2
- b) Commercial 1
- 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 2

8. What is the percentage of total development projects that were conditioned to meet SUSMP requirements? 100%

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?

Yes, in March of 2003.

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

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

- 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.

- 13. Did your agency update any of the following General Plan elements in the past year?
 - a) Land Use Yes No
 - b) Housing Yes No
 - c) Conservation Yes No
 - d) Open Space Yes No

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

There was no opportunity to incorporate storm water quality/quantity considerations into the subject General Plan elements during this permit year.

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

- 14. How many targeted staff were trained last year? 2
- 15. How many targeted staff are trained annually? 2
- 16. What percentage of total staff are trained annually? *Not as many City staff were trained this year because the same information has been presented for the past five years. Instead, only program managers were provided with the training who will then pass it on to affected staff over the course of the next permit year.* 5%
- 17. Has your agency developed and made available development planning guidelines? Yes No
- 18. If no, what is the expected date that guidelines will be developed and available to developers?
- 19. What is the status of completion of the technical manual for siting and design of BMPs for the development community?

Instead of using the County's siting manual, the City has developed its own guidelines for development planning/SUSMP compliance. The City has become more prescriptive in determining SUSMP compliance for subject projects. It requires infiltration controls to the extent feasible. It provides developers some discretion in determining what specific infiltration controls but in the final analysis has the authority to decide what must be used. Developers are encouraged to use the County's SUSMP guidelines and its recently developed LID handbook. In any case, this issue is academic in light of the draft MS4 permit's prescriptive BMPs for subject development projects.

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

D. Development Construction Program

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

In accordance with the current MS4 permit for Los Angeles County, the City requires a GIASWP for projects that are expected to disturb 1 acre or more by grading, clearing, and/or excavating and minimum BMPs for projects that are expected to disturb less than 1 acre of soil disturbance. These conditions must be met to qualify for a grading permit.

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?

Grading permits are conditioned on evidence showing that an NOI has been obtained (specifically, a WDID number). The applicant must also accept, as a condition for grading permit issuance, that a proper SWPPP will be prepared and will be kept on-site during the course of construction.

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

- 5. How many building/grading permits were issued to sites requiring Local SWPPPs last year? 0
- 6. How many building/grading permits were issued to sites requiring coverage under the General Construction Activities Storm Water Permit last year? 0
- 7. How many building/grading permits were issued to construction site less than one acre in size last year? 1
- 8. How many construction sites were inspected during the last wet season? 221
- 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	0	0	0	0
Inadequate BMP/SWPPP implementation	0	0	0	0

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

An instance of non-compliance with any of the development construction program triggers a verbal warning, followed with a Notice of Violation letter. If non-compliance persists, the matter then becomes a code enforcement issue. However, the verbal warnings, coupled with the threat of referring the contractor to the regional board for stronger enforcement action, has been sufficient to compel compliance.

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

Response: Grading permits are kept on file. Prior to March 10, 2003, all grading permits were conditioned on permit requirements for soil disturbing projects over 5 acres, 2 acres and less than 5 acres, and less than 2 acres. After March 10, 2003, conditions were amended to reflect the lower thresholds for development construction program requirements called for under the current Los Angeles.

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

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? 0
- c) How many did your agency respond to? 0
- d) Did your agency investigate all complaints received? *None reported.* Yes No
- e) How many complaints were received? 0
- 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:

- 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:

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

All reports of sewage releases are responded to immediately. Field crews are dispatched to the reported release location and are trained to prevent the entry of sewage into the catch basin (e.g., by covering the inlet with sand bags). The ponded sewage is then vacuumed and discharged into the sewer system. The affected area is also disinfected with sodium hypochlorite and then vacuumed (while the catch basin inlet is still protected) for disposal into the sewage system as well). See uploaded attachment.

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 ? %

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

c) What is the total number of active public construction sites?
How many were 5 acres or greater in size?

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 for 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

Los Angeles County Municipal Storm Water Permit (Order 01-182)

Individual Annual Report Form

Attachment U-4

b) Briefly describe how your agency implements the following, and any additional, BMPs to minimize pollutant discharges in storm water:

1. **Good housekeeping practices** are implemented in accordance with its City's storm water pollution prevention plan and its public agency program.
2. **Material storage control** BMPs are implemented in accordance with its City's storm water pollution prevention plan and its public agency program.
3. **Vehicles leaks and spill control** BMPs are implemented through the City's storm water pollution prevention plan and its public agency program.
4. **Illicit discharge control** BMPs are implemented through the City's storm water pollution prevention plan, its public agency program, and its illicit connection/discharge detection and elimination program.

c) Are all Permittee owned 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?

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

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:

Los Angeles County Municipal Storm Water Permit (Order 01-182)

Individual Annual Report Form

Attachment U-4

Basically, the protocol or "SOP" calls for impacted landscape maintenance personnel to (1) apply minimum amounts of each significant material; and (2) avoid application during storm events or impending storm events.

- 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?

Impacted City personnel were given training in the proper application of pesticides and chemical organic fertilizers.

- 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:

[Empty box for listing banned pesticides, herbicides, fungicides, or rodenticides]

- d) What percentage of your agency's staff that apply pesticides are certified by the California Department of Food and Agriculture, or are under the direct supervision of a certified pesticide applicator? 100%

- e) Describe procedures your agency has implemented to encourage retention and planting of native vegetation and to reduce water, fertilizer, and pesticide needs:

Landscape maintenance staff has been provided training that encourages the planting of native and drought tolerant vegetation, which is also in keeping with the City's water conservation program. Impacted City staff has also been encouraged, also by training, to incorporate integrated pest management (IPM) whenever possible as a means of reducing the need for pesticides.

5. Storm Drain Operation 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: 1

Los Angeles County Municipal Storm Water Permit (Order 01-182)

Individual Annual Report Form

Attachment U-4

Priority B: 21

Priority C: 90

- c) Is your city subject to a trash TMDL? Yes No
- 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.

The City has budgeted funds to install 4 to 8 debris exclusion controls in catch basins located in industrial and commercial areas.

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

- e) How many times were all Priority A basins cleaned last year? 4
- f) How many times were all Priority B basins cleaned last year? 2
- g) How many times were all Priority C basins cleaned last year? 2
- h) How much total waste was collected in tons from catch basin clean-outs last year? 1.5 tons
- 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.
- j) Did your agency place and maintain trash receptacles at all transit stops within its jurisdiction. **This task was completed prior to June of 2006.** Yes No
- k) How many new trash receptacles were installed last year? **None**
- 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 No
- (2) Arrange for temporary screens to be placed on catch basins? **Catch basins are sometimes blocked off by sand bags or viscaine.** Yes No
- (3) Or for catch basins in that area to be cleaned out subsequent to the event and prior to any rain? Yes No
- m) Did your agency inspect the legibility of the catch basin stencil or labels? Yes No
 What percentage of stencils were legible? 100%

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

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

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?

None. The prescribed BMPs appear to be adequate.

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

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

The city contracts with Los Angeles County to clean the catch basins once per year. The City supplements this by cleaning catch basins once a year using a vacuum truck.

s) Where is removed material disposed of?

To the yard, temporarily, and then to a 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

Los Angeles County Municipal Storm Water Permit (Order 01-182)

Individual Annual Report Form

Attachment U-4

(2) Priority B - streets and/or street segments that are designated as consistently generating moderate volumes of trash and/or litter? Yes No

(3) Priority C – streets and/or street segments that are designated as 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 following schedule:

(1) Priority A – These streets and/or street segments shall be swept at least two times per month? (Note: All streets are swept at least twice a 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

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

- 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? and 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?

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

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? *N/A* 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? *N/A, because there was none.* 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

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

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.). [See uploaded document.](#)
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.

[See uploaded map.](#)

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

[The City's policy regarding illicit discharges and connections is as follows:](#)

- [Upon discovery of an in progress illicit discharge, code enforcement or police, or file is summoned – depending on the type of material being discharge.](#)
- [A discovery of a suspect illicit connection is investigated for verification. If it is in fact an illicit connection, enforcement action is initiated almost immediately.](#)

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

[All reports of illicit discharges and connections and their disposition are tracked on hard-copy forms. Required reporting data are then converted into GIS format \(specifically, ArcView\).](#)

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

- 5. What is the total length of open channel that your agency owns and operates? 3342 LF
- 6. What length was screened last year for illicit connections? 4000 LF
- 7. What is the total length of closed storm drain that your agency owns and operates? 0
- 8. What length was screened last year for illicit connections? 0
- 9. Describe the method used to screen your storm drains.

County inspects the closed storm drain using confined space entry. The Inspectors perform a visual inspection on low-profile carts on castors inside the storm drain pipes.

- 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							
02/03							
03/04							
04/05							
05/06							
06/07							
07/08							
08/09							
09/10							
10/11							
11/12	0	0	0	0	0	0	0

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

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

12. What is the average time it takes your agency to initiate an illicit connection investigation after it is reported? **Immediately to 48 hours depending on the type of discharges.**

a) Were all identified connections terminated within 180 days? **N/A** Yes No

b) If not, explain why.

The definition of "illicit connection" as used by the County is any connection to the storm drain that is not permitted. The City, however, typically does permit such connections. Further, the County's definition of illicit connection defers substantially from the definition provided in USEPA's storm water guidelines, which is *any connection through an illicit discharge passes*. This accounts for the "zero" detection response. Still, in dealing with an illicit connection through which an illicit discharge passes the City's response is the same as it is for an illicit discharge.

13. Provide the reporting data for illicit discharges as suggested in the following table (you may submit a spreadsheet from you 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							
02/03							
03/04							
04/05							
05/06							
06/07							
07/08							

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

08/09							
09/10							
10/11							
11/12	0	0	0	0	0	0	0

3. What is the average response time after an illicit discharge is reported? 24 hours

a) Did any response times exceed 72 hours? Yes No

If yes, explain why.

If the discharge is minor such as wash water (consisting of de-ionized water) from an auto dealership, which does not use detergents, then follow-up may not always occur within the 72 hours. However, a written notice is sent to the discharger notifying it that it should implement BMPs to prevent the intrusion of wash water into the MS4.

4. Describe the your agency's spill response procedures.

In the event of a sewage release to the MS4, the City's protocol calls for preventing the material from entering the storm drain (catch basin or channel) through containment and/or by placing a barrier in front of the catch basin inlet. The next step is to properly remove the material. In the event of a sewage release. In the event of a hazardous materials release, the Fire Department is responsible for properly removing and disposing the material depending on type.

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

The City has begun to use GIS to track all reports of illicit connections and discharges as means of determining "hot spots" and trends.

6. Attach a list of all permitted connections to your storm sewer system. The City does not permit connections to the MS4.

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

SUMMARY OF PROGRAM EFFECTIVENESS

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. [The City continues to participate in a special studies program with other MS4 permittees.](#)

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:
14. An assessment of your agency's compliance with permit requirements, based on your responses to the questions in this form;
 15. Descriptions of any evaluation methods that your agency uses to determine the effectiveness of your storm water management program;
 16. A summary of the strengths and weaknesses of your agency's storm water management program;
 17. A list of specific program highlights and accomplishments;
 18. A description of water quality improvements or degradation in your watershed over the past fiscal year;
 19. Interagency coordination between cities to improve the storm water management program;
 20. Future plans to improve your agency's storm water management program; and
 21. Suggestions to improve the effectiveness of your program or the County model programs.
- 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.
- C) List any suggestions your agency has for improving program reporting and assessment.

Program Effectiveness Summary

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

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

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

Response: The City believes it has implemented each of the program tasks associated with the current and previous municipal NPDES permit (see below "Program Highlights"). It must be presumed, therefore, that so doing has resulted in program effectiveness desired by the regional board. The municipal NPDES permit is, essentially, 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. A more objective and reliable method of determining program effectiveness is to use monitoring data, which is expected to be available some time next year. As mentioned, the City has faired-well in meeting dry weather ambient waste load allocations for all metals.

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

Response: 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. However, outfall monitoring data should provide a better performance measure in addressing applicable water quality standards through BMP implementation.

4. A list of specific program highlights and accomplishments.

During the 2011-2012 permit year San Fernando continued to implement BMPs contained its stormwater quality management plan (SQMP) in a complete and timely manner, in accordance with the current MS4 permit for Los Angeles County. In addition, the City performed tasks associated with the several TMDLs to which it is subject. San Fernando is situated in Reach 2 of the Rio Hondo which is tributary to the Los Angeles River. As a consequence, San Fernando is subject the Los Angeles River bacteria, metals, nutrients, and trash TMDLs.

San Fernando participated in the Los Angeles River Coordinated Monitoring Program. Wet and dry weather monitoring data generated from the Los Angeles River CMP revealed non-compliance with wet weather waste load allocations (WLAs), but showed compliance with dry weather WLAs. Federal stormwater regulations require compliance with ambient water quality standards (includes TMDLs), not wet weather waste load allocations, which are inherently non-ambient. However, they do not require compliance in the receiving water based on in-stream monitoring data. Instead federal regulations require that compliance be determined the outfall stormwater through discharge monitoring. In any event, a strong case can be made that ambient monitoring data for dry weather places the City in compliance with the metals TMDLs. Still, the City looks forward to performing outfall monitoring to determine if its stormwater discharges are meeting ambient TMDL standards for metals.

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

With regard to the Los Angeles River bacteria and nutrients TMDLs the City intends to conduct outfall monitoring to determine if its discharges are causing exceedances of waste load allocations for these pollutants. If persistent exceedances are detected from the City's outfall(s), it will amend its stormwater quality management plan (SQMP) to include bacteria and/or nutrient-specific BMPs.

San Fernando is also subject to the trash TMDL for the Los Angeles River. It has already installed debris screens in many of its catch basins. It has not, however, installed screens in County-owned catch basins because of budget constraints. It is hoping that the passage of the water quality fee initiative will generate the funds necessary to pay for this task.

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

We know of no improvements or degradation that has occurred in reaches 4 and 5 of the Los Angeles River. However, based on CMP metals monitoring data the City complied with dry weather WLAs for copper, lead, and zinc. Since there were no previous monitoring of this type it is impossible to say that it is improvement. In any case, if the dry weather data were to applied to an ambient standard the City would be in compliance with this TMDL.

The City is aware that the Natural Resources Defense Council (NRDC) has noted exceedances in the San Gabriel and Los Angeles Rivers on several occasions. The County flood control district, as principal permittee, has not notified the City of such exceedances, or the need to amend its stormwater quality management plans (SQMPs). The problem is that the exceedances were detected from monitoring stations located in the river. The City has no idea of whether it caused the exceedance because of sources of stormwater runoff enter this receiving water body, some of which, but not all, have NPDES stormwater permits. Furthermore, it is the City's understanding that compliance with water quality standards (including TMDLs) is determined by monitoring discharges from outfalls (before the discharge reaches the receiving water). It is not determined by complying with wet weather WLAs in the receiving water.

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

The City participated with the Los Angeles Stormwater Permit group to develop a new MS4 permit and watershed management program approach.

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

To conduct outfall stormwater monitoring for statutorily required and TMDL required constituents against waste load allocations established for both the Los Angeles River. If outfall monitoring reveals persistent exceedances, the City shall revise its SQMP – in accordance with the iterative process – by either intensifying existing BMPs or adding new ones.

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

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

Under the next permit monitoring should be revised to place the compliance point in the discharge at the end-of-pipe (or manhole nearest to it). Data generated for such sampling will provide more meaningful information relative to (1) meeting water quality standards including TMDL waste load allocations; and (2) evaluating the performance of BMPs in meeting those standards. Unfortunately, in-stream monitoring has not been useful in these areas. In-stream monitoring should serve only to generally gauge the health of a receiving water and provide targets to strive for but not to comply with.

B. Self Assessment

Because the City has fully implemented all of the requirements of the Los Angeles County MS4 permit in a complete and timely manner it must rate itself a 10.

C. Suggestions for Improving Program Reporting and Assessment

As reported last year, the Principal Permittee significantly improved the annual reporting process by implementing an electronic submittal system, which has reduced preparation and submittal time, while also reducing paper-work. However, annual reporting would be made more efficient if it the requirement for reporting the number building permits was eliminated. The data really is not helpful in determining compliance with either SUSMP or development construction requirements and it requires a great deal of staff time to obtain the information. Hopefully, the next MS4 permit will contain a revised annual report form that is more streamline and does not require extraneous