

**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:

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**Reporting Year 2010-2011**

**I. Program Management**

A. Permittee Name: CITY OF WEST HOLLYWOOD

B. Permittee Program Supervisor: PAUL AREVALO

Title: **CITY MANAGER**

Address: **8300 SANTA MONICA BLVD.**

City: **WEST HOLLYWOOD**

Zip Code: **90069-6216**

Phone: **(323) 848-6400**

Fax: **(323) 848-6564**

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 Engineering/Environmental Services Division of the Department of Public Works takes the lead for the implementation of the City of West Hollywood's NPDES program. Activities are primarily coordinated with Building, Planning, Public Safety, Code Compliance and Street Maintenance as well as the City's contracted environmental consultant, John L. Hunter & Associates.**

**Los Angeles County Municipal Storm Water Permit (Order 01-182)****Individual Annual Report Form****Attachment U-4****TABLE 1 - Program Management**

<b>Storm Water Management Activity</b>	<b>Division/Department</b>	<b># of Individuals Responsible for Implementing</b>
1. Outreach & Education	<b>Environmental Services, Recreation, Public Safety, Public Information Office/Web Manager &amp; Environmental Consultant.</b>	<b>6</b>
2. Industrial/Commercial Inspections	<b>Environmental Services, Environmental Consultant &amp; LA County DPW-Industrial Waste</b>	<b>3</b>
3. Construction Permits/Inspections	<b>Environmental Services, Environmental Consultant and Building and Safety.</b>	<b>4</b>
4. IC/ID Inspections	<b>Environmental Services, Environmental Consultant, Code compliance, Engineering, Street Maintenance, LA County DPW</b>	<b>6</b>
5. Street sweeping	<b>Contractor(Supervised by Street Maintenance Division.)</b>	<b>Contractor +1</b>
6. Catch Basin Cleaning	<b>Contractor(Supervised by Engineering Division)</b>	<b>Contractor + 1</b>
7. Spill Response	<b>Supervised by Street Maintenance Division</b>	<b>Contractor + 1</b>
8. Development Planning (project/SUSMP review and approval)	<b>Environmental Services, Environmental Consultant &amp; Building and Safety/Planning Division</b>	<b>3</b>
9. Trash Collection	<b>Contractor(Supervised by Environmental Services)</b>	<b>2</b>

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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.

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**
- **Sewer Assessment District**
- **Gas Tax**
- **Inspection Fees Charged to Businesses**
- **Applicant/Developer Plan Check Fees for SUSMP/SWPPP Approvals**
- **Plan Check Fees for Construction Mitigation Plans**
- **Encroachment Permit Fees**

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.

- **Used Oil Grant- California Integrated Waste Management Board**
- **Bottles and Cans Recycling Grant-California Department of Conservation**

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**TABLE 2**

<b>Program Element</b>	<b>Expenditures in Previous Fiscal Year</b>	<b>Estimated Amount Needed to implement Order 01-182</b>
1. Program management a. Administrative costs b. Capital costs	\$45,000	\$225,000
2. Public Information and Participation a. Public Outreach/Education • LA County PPP- \$5000 • Env. Booklet/SHARPS- \$20,500 • Used Oil (KJ Services) - \$3000 b. Employee Training(John L. Hunter & Associates and In-House City Staff) c. Corporate Outreach d. Business Assistance	\$35,000	\$175,000
3. Industrial/Commercial inspection/site visit activities	\$38,500	\$192,500
4. Development Planning	\$6,000	\$30,000
5. Development Construction a. Construction inspections	U	U
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	a. \$5,000 b. \$75,000 c. \$30,000 d. \$40,000 e. \$45,000 f. \$15,000	\$1,050,000
7. IC/ID Program a. Operations and Maintenance b. Capitol Costs	\$35,000	\$175,000
8. Monitoring	\$51,138	\$150,000
9. Other	\$96,000	\$480,000
10. TOTAL	\$516,638	\$2,477,500

List any supplemental dedicated budgets for the above categories:

N/A
-----

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

- |   |
|---|
| <ul style="list-style-type: none"> <li>• Executed 3 MOA's with City of Los Angeles for monitoring of metals, toxics and bacteria in Ballona Creek.</li> <li>• NPDES inspections of food related and automotive commercial businesses contracted through John L. Hunter and Associates.</li> </ul> |
|---|

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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 countywide model program SQMP.**

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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.

**Pet waste stations, catch basin debris excluders for heavily traveled arterials, porous pavement parking lot, daily street sweeping and hand pick-up of litter, waterbrooms for priority businesses, etc.**

E. Watershed Management Committees (WMCs)

1. Which WMC are you in? **Ballona Creek**
2. Who is your designated representative to the WMC? **Sharon Perlstein**
3. How many WMC meetings did you participate in last year? **4(All)**
4. Describe specific improvements to your storm water management program as a result of WMC meetings.

**Nothing specific at this time.**

5. Attach any comments or suggestions regarding your WMC. Nothing at this time.

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**

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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.**

**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? **15 out of an estimated 500 inlets. Majority are County owned.**
  - b) How many storm drain inlets were marked with a no dumping message in the last fiscal year? **All are marked.**
  - c) What is the total number of storm drain inlets that are legibly marked with a no dumping message? **All are Legible.**

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.

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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? **None. There are no creeks, channels or other water bodies within our jurisdiction.**

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

**N/A. The City does not have access points to creeks, channels or other bodies of water.**

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? **The LA County Hotline is used along with Environmental Services at (323)848-6404. City number is not technically a hotline, as the County's but, calls are received.**

- 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?  
**Approximately 100+ calls received. (Valid complaints or not) All calls are tracked by Code Compliance divisions.**

- g) Describe the process used to respond to hotline calls.

**Calls referred to the City by the County are responded to within 24 hours. Due to the small area of the City of less than 2 square miles, we normally have immediate notification of discharges from constituents or field staff. City calls are sent to Code Compliance or Public Works Inspector for immediate action if commercial or construction site. For abandoned items, such as a battery in the street, Street Maintenance removes immediately.**

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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](http://www.888CleanLA.com) web site (Principal Permittee only)? Yes  No   
If not, when is this scheduled to occur? **N/A**

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(All)**  
Explain why your agency did not attend any or all of the organized meetings.

**All meetings were attended.**

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

**Nothing specific at this time.**

List suggestions to increase the usefulness of quarterly meetings:

**Nothing at this time.**

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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? **LA County reports 130 million paid, and 30.3 added-value impressions from media buys through the storm water program. Locally, estimate 10,000 impressions.**

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

**The Westside Cities( West Hollywood, Beverly Hills and Culver City) provided urban runoff/pollution prevention information to local school children through local events that were held in all three cities throughout FY 2010/11. Storm water related coloring sheets with crayons, environmental puzzles, Frisbees, etc. were distributed, along with informational handouts and brochures.**

- 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**

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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**

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

**1) Contractors and Developers – The City distributes Construction Manual “Working for a Cleaner Bay”**

**2) Pet waste tip cards – sent to neighborhoods/constituents reporting pet waste discharges.(English and Spanish)**

**3) “Recycle, Reduce, Reuse Recycling Guide” distributed to about 900 people at West Hollywood Kids Fair.**

**4) Premiums for used oil recycling(shop rags & oil containers) distributed at community events, car shows and California Coastal Clean-Up Day(Heal the Bay)**

**5) “Sidewalk, Patio and Parking Lot Cleaning for Commercial Businesses”- Brochure to business owners; also posters in English and Spanish.**

**\* At each community event, staff engage booth visitors in conversation about the environment, and how small changes in their daily habits can have a positive effect on the environment. Emphasis is placed upon keeping the storm drains clean by not allowing fertilizers and pesticides to wash into the gutters. We remind people to pick up after their pets, pick up litter and to not allow automotive fluids or paints into the storm drains. These community based, social marketing methods have proven effective in modifying behavior, and involving the booth visitors with the health and beauty of their community.**

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**

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- 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.

**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's Business Assistance Program often centers around Commercial Code Compliance activities. In addition, interaction with West Hollywood's Chamber of Commerce and related neighborhood groups and Business Associations is key in getting the word out to the business community. Public Outreach material is also available at every applicable City event.**

- 6. Did you encourage local radio stations and newspapers to use public service announcements? Yes  No   
How many media outlets were contacted? **4**  
Which newspapers or radio stations ran them?

**Local cable stations have High School Video PSA's on file. (FY2008/09) These promote environmental responsibility and healthy storm drains. These are available for their use at any time and are encouraged to run them periodically.**

Who was the audience?

**General Public**

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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: **N/A**
- Type of media purchased: **N/A**
- Frequency of the buys: **N/A**
- 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? Yes  No
- If so, describe the type of advertising.

**At each community event(West Hollywood, Beverly Hills and Culver City), staff engage booth visitors(business owners and residents) in conversation about the environment, and how small changes in their daily habits can have a positive effect on the environment. Emphasis is placed upon keeping the storm drains clean by not allowing fertilizers and pesticides to wash into the gutters. We remind people to pick up after their pets, pick up litter and to not allow automotive fluids or paints into the storm drains. Community based, social marketing methods have proven effective in modifying behavior, and involving the booth visitors with the health and beauty of their community.**

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

**Biodegradable doggy bags & pet waste tip cards were distributed through Neighborhood Watch groups, as well as through the City's dog licensing program. In addition, City Code Compliance Officers, in tandem with our Sheriff's Department, distributed these same materials at West Hollywood dog parks during enforcement sweeps.**

Who were the key partners? **Neighborhood Watch groups**

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

**Residents who walk/own dogs, general population and visitors to the City, as appropriate.**

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

11. Does your agency have a website that provides storm water pollution prevention information? Yes  No
- If so, what is the address? **www.weho.org/environment**

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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.

**Community awareness continues to increase due to public education & outreach, coupled with Code Compliance Division's enforcement actions, as well as site inspections which are conducted by the City's environmental consultant, John L. Hunter & Associates.**

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

**Russian language public outreach materials – available countywide.**

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**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: **The Critical Source Inventory is updated prior to the start of the inspection cycle and annually thereafter. Field inspectors also update the Critical Source Inventory on a routine basis when observations in the field suggest a business should be added or removed from the list.**

**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
Restaurants	<b>N/A. (There is currently no reporting cycle.)</b>	<b>258(There is currently no reporting cycle)</b>	<b>100%</b>	<b>830</b>
Automotive	<b>N/A. (There is currently no reporting cycle.)</b>	<b>25(There is currently no reporting cycle)</b>	<b>100%</b>	<b>104</b>
Ind/Comm.	<b>N/A. (There is currently no reporting cycle.)</b>	<b>29(There is currently no reporting cycle)</b>	<b>100%</b>	<b>160</b>

Comments/Explanation/Conclusion: **The City continues to promptly respond to complaints/observations of illicit discharges, as well as to conduct routine inspections, regardless of the existence of a reporting cycle.**

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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
<b>Restaurant</b>	<b>258 (There is currently no reporting cycle.)</b>	<b>249</b>	<b>96%</b>	<b>9</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>722</b>	<b>108</b>
<b>Automotive</b>	<b>25 (There is currently no reporting cycle.)</b>	<b>24</b>	<b>96%</b>	<b>1</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>78</b>	<b>26</b>
<b>Ind/Com</b>	<b>29 (There is currently no reporting cycle.)</b>	<b>29</b>	<b>100%</b>	<b>0</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>124</b>	<b>7</b>

Comments/Explanation/Conclusion: **There is currently no reporting cycle since the MS4 permit is expired.**

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**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)
<b>Verbal Warning</b>	<b>10</b>	<b>N/A</b>	<b>0*</b>	<b>N/A</b>	<b>0*</b>	<b>N/A</b>	<b>120</b>
<b>NOV</b>	<b>0</b>	<b>N/A</b>	<b>0</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>37</b>
<b>Citations from City Commercial Code Compliance</b>	<b>13</b>	<b>U</b>	<b>~13</b>	<b>U</b>	<b>13</b>	<b>U</b>	<b>U</b>

Facilities by category	Number of Warning letters	Number of NOV's	Number of Referral	Number of Other	Citations from Code Compliance
Restaurant	<b>0</b>	<b>0</b>	<b>9</b>	<b>9(verbal)</b>	<b>U</b>
Automotive	<b>0</b>	<b>0</b>	<b>1</b>	<b>1(verbal)</b>	<b>U</b>
Ind/Comm.	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>U</b>

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 BMP's in their everyday operations. Notices of Violation are sent when other methods fail to bring about anticipated results. Due to database limitations, facility categories for NOV's and Citations are not readily available; in addition to the exact number of re-inspections performed.**

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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:

**The NPDES program is generally well received by the facilities on the Critical Source Inventory. Outreach materials distributed during routine site inspections help open discussion of necessary BMP's and why they need to be implemented. This cycle, enforcement was executed by Code Compliance staff. Given the constant turnover of businesses and managers, ongoing education and inspection is key. Facility owners, managers and staff generally respond well to inspectors' requests for changes in operations to meet requirements for compliance.**

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

**N/A. The Industrial/Commercial Facilities Program and corresponding Critical Source Inventory is managed & maintained by the City's contracted environmental consultant, John L. Hunter & Associates.**

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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? Yes  No

Attach examples showing how storm water quality impacts were addressed in environmental documents for projects over the past year. **See Attachment.**

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.

**Fossil Filter Catch Basin Inserts - 1  
Signage/Stencils - 5  
Infiltration Trench - 3**

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

**N/A. No natural drainage systems.**

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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.

**Developers submit plans to the City for review. The City staff determines whether the project is included in the priority project category or not. If yes, then appropriate forms and guidelines are provided to the developers.**

**Pre-Construction: Projects are sent for NPDES review to consultant John L. Hunter & Associates. Building permits are not issued until the SUSMP/SWPPP is approved.**

**Post-Construction: Inspection of BMP's prior to issuance of Certificate of Occupancy. Consultant inspects and signs off on installation. Annual inspection of structural BMP's conducted. Deficiencies are corrected, fines may be levied.**

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7. How many of each of the following projects did your agency review and condition to meet SUSMP requirements last year?
- |   |   |
|---|---|
| a) Residential  | 0 |
| b) Commercial   | 2 |
| 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? **<1%**
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?

**Adoption of legal authority.**

**At 1.9sq miles, the city has very few projects that would meet the one acre threshold, about 0-2 a year.**

**We have procedures in place for all priority projects, including those over 1 acre in size. Applicants must prepare a SWPPP and SUSMP and are inspected daily by the City's Public Works Inspector.**

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10. After 2003, how many additional projects per year will require/did require implementation of SUSMP requirements as a result of the lower threshold? **0-2**
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.

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.

**Work on the General Plan began in 2007/08 and should be completed within the next few years. Watershed and storm water quality management updates are part of the process.**

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14. How many targeted staff were trained last year? **48**
15. How many targeted staff are trained annually? **45-60**
16. What percentage of total staff are trained annually? **30%**
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? **N/A.**
19. What is the status of completion of the technical manual for siting and design of BMPs for the development community?

**BMP manual has already been developed by the Principal Permittee. Applicants are further directed to [www.bmpla.org](http://www.bmpla.org). The West Hollywood Construction booklet "working for a Cleaner Bay", online and in hard copy. The California Stormwater Quality Association's (CASQA) website and BMP Handbooks are commonly utilized as a reference.**

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D. Development Construction Program

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

**Contractors and owners complete an “Owner’s Certification of Best Management Practices at All Construction Sites” prior to the issuance of demolition or building permits. All sites >1 acre are required to file a NOI with the State and obtain a WDID number – prior to plan check approval and issuance of subsequent permits. The City’s Public Works Inspector monitors all job sites routinely throughout the each week.**

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. **See Attachment.**
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?

**Applicants required to file a NOI must have a copy of the NOI on file, and provide a WDID number - prior to plan check approval. Demolition, grading or building permits are not issued until the WDID number has been ascertained.**

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- 5. How many building/grading permits were issued to sites requiring Local SWPPPs last year? **11**
- 6. How many building/grading permits were issued to sites requiring coverage under the General Construction Activities Storm Water Permit last year? **11**
- 7. How many building/grading permits were issued to construction site less than one acre in size last year? **613**
- 8. How many construction sites were inspected during the last wet season? **(Total # of inspections is provided.)** **2,484**
- 9. Complete the table below. **\*Due to database limitations, categories for violations are not readily available. The table below reflects best estimates based upon total number of violations issued for FY 2010/11 by Code Compliance Divisions.**

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

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

<ul style="list-style-type: none"> <li>• <b>Off-site sediment or other discharge violations – job is shut down by Public Works Inspector until site is in compliance with SWPPP/minimum BMPs.</b></li> <li>• <b>Unprotected catch basins, torn sandbags, etc. – BMP remedied, then job can resume.</b></li> <li>• <b>Enforcement actions include citations/fines from Code Compliance, working in conjunction with the Public Works Inspector and Environmental Programs (NPDES) Coordinator.</b></li> </ul>
--

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

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**The City's Building & Safety Division utilizes a computer database to track all grading permits issued by the City.**

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? **6**
- c) How many did your agency respond to? **All with LA County**
- d) Did your agency investigate all complaints received? Yes  No
- e) How many complaints were received? **6**
- 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:

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**The City is implementing many measures to comply with SSO and SSMP Program requirements. Measures include a contract with LA County to provide:**

- Periodic cleaning
- Root control
- Grease and other blockage related inspections
- Emergency call-outs
- Industrial Waste Program/F.O.G. Program

**A multi-year master plan is in place for sewer rehabilitation and maintenance. Annual budget for sewer rehabilitation and maintenance is \$480,000.**

- 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 City is implementing many measures to comply with SSO and SSMP Program requirements. Measures include a contract with LA County to provide:**

- Periodic cleaning
- Root control
- Grease and other blockage related inspections
- Emergency call-outs
- Industrial Waste Program/F.O.G. Program

**A multi-year master plan is in place for sewer rehabilitation and maintenance. Annual budget for sewer rehabilitation and maintenance is \$480,000.**

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:

**N/A. No sites greater than 5 acres in the City.**

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- c) What is the total number of active public construction sites? 1  
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 for sites one acre or greater?(No public sites that size.) 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

**The City outsources vehicle maintenance work. BMPs are in place for the day to day care & storage of all equipment and vehicles owned and/or operated by the City; as well as any materials storage locations or maintenance yard locations.**

- 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

**Annual Storm Water Training of City Staff is key in implementing the above. Coupled with Preventive Maintenance of Vehicles and Equipment, as well as adequate supervision of City staff and their work areas – these BMPs are consistently in place.**

- 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?

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**N/A. The City has no such areas.**

- d) How many Permittee owned and/or operated vehicle/equipment wash areas are scheduled to be redeveloped to include the BMPs listed above? **N/A. The City has no owned or operated vehicle wash areas.**

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:

**Contractors perform this service. Landscaping activities in which these materials must be used is performed in a manner that avoids exposure to storm water or urban runoff. In some instances, if City plants are found to require pesticides, they are removed and replaced with other plants.**

- 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?

**Contractors perform this service. All application is performed by or under supervision of a qualified pesticide applicator. Two staff members in the landscape division are trained in Integrated Pest Management.**

- 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:

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N/A.

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:

**Drought tolerant plants are recommended and found in the landscaping section of the Zoning Code. The City's "Green Building" ordinance passed in 2007, requires compliance with Municipal Code Sections (19.26.060, 19.20.190 and Chapter 15.52) relating to plant materials, irrigation and water conservation.**

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:	<b>104</b>
Priority B:	<b>16</b>
Priority C:	<b>93</b>

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- 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.

- **146 debris excluders have been installed.**
- **Public trash containers along major arterials, including all bus stops.**
- **Street sweeping program: Commercial streets swept daily by vacuum truck; all others once per week.**
- **Hand pick-up of litter on main arterials (Santa Monica Blvd and Sunset Blvd) 6 days a week.**

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- 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? 4
- g) How many times were all Priority C basins cleaned last year? 4
- h) How much total waste was collected in tons from catch basin clean-outs last year? **County cleans out under contract. Estimated tonnage available on pro rata basis only.**
- 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. **See Attachment.**
- j) Did your agency place and maintain trash receptacles at all transit stops within its jurisdiction. Yes  No
- k) How many new trash receptacles were installed last year? **No known net gain. Some receptacles replaced by others.**
- 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? 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%**

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- 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? **N/A.** Yes  No   
 Is the prioritization attached? **N/A. City has no open channels.** 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?

- **146 debris excluders have been installed.**
- **Public trash containers along major arterials, including all bus stops.**
- **Street sweeping program: Commercial streets swept daily by vacuum truck; all others once per week.**
- **Hand pick-up of litter on main arterials (Santa Monica Blvd and Sunset Blvd) 6 days a week.**
- **Pet waste stations (80) have been installed.**
- **Public recycling containers (~50) have helped reduce trash/pollutants and protect water quality.**

- q) Did your agency remove trash and debris from open channel storm drains a minimum of once per year before the storm season? **N/A. No open channels.** Yes  No
- r) How did your agency minimize the discharge of contaminants during MS4 maintenance and clean outs?

**Debris is not allowed to enter the outlet pipes during cleaning.**

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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
- (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? 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

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- 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? How many? Yes  No   
**All are cleaned more than once a month.**

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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?  
**N/A. We had no real emergencies, but procedures are in place should one occur.** Yes  No
- b) Were BMPs implemented to the extent that measures did not compromise public health and safety? **N/A.** 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? **N/A. County Sanitation District does not have any studies for this type of project in the Ballona Creek Watershed.** 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?  
**Reviewed and determined no applicable sites.** 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.). **See attachment.**
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.

- **IC/ID Elimination Implementation Program submitted with 2005-2006 report.**
- **Locations/mappings of any and all illicit connections & illicit discharges within the City are transferred electronically to Principal Permittee, on an annual basis – as part of the County's IC/ID Report.**

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

**The City responds to complaints regarding storm water or other urban run-off pollution. It also proactively conducts routine inspections of regulated businesses and daily inspections of construction sites.**

**If an illicit discharge is identified, the discharge must be discontinued and immediately cleaned-up. If the discharge reaches the catch basin, the violator is also responsible for cleaning the affected area. The violator is given thirty days to provide a written description of all best management practices that will be used to prevent future discharges into the MS4. Information about illicit connections and discharges are kept in a data base and follow up investigations are conducted for three months.**

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

**Records for all illicit connections and illegal discharges are maintained on an electronic data base. 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?       | <b>No open channels</b>       |
| 6. | What length was screened last year for illicit connections?                        | <b>No open channels</b>       |
| 7. | What is the total length of closed storm drain that your agency owns and operates? | <b>No closed storm drains</b> |
| 8. | What length was screened last year for illicit connections?                        | <b>N/A.</b>                   |
| 9. | Describe the method used to screen your storm drains.                              |                               |

**Owned by LA City and County.**

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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	0	0	0	0	0	0
02/03	0	0	0	0	0	0	0
03/04	0	0	0	0	0	0	0
04/05	0	0	0	0	0	0	0
05/06	0	0	0	0	0	0	0
06/07	0	0	0	0	0	0	0
07/08	0	0	0	0	0	0	0
08/09	0	0	0	0	0	0	0
09/10	1	1	0	1	1	1	0
10/11	0	0	0	0	0	0	0

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

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

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

- b) If not, explain why.

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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	4	4	0	4	0	4	0
02/03	26	14	0	10	0	0	8
03/04	27	17	0	19	0	0	12
04/05	48	47	0	29	0	0	13
05/06	36	36	0	20	0	0	16
06/07	94	94	0	0	0	0	50
07/08	84	84	0	0	0	0	84
08/09	64	64	N/A	N/A	N/A	N/A	64
09/10	90	90	N/A	N/A	N/A	N/A	90
10/11	15	15	N/A	N/A	N/A	N/A	15

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 the your agency's spill response procedures.

**After a spill is reported, an investigation is performed ASAP. An inspector and/or Code Enforcement Officer reports to the site and determines whether further agencies or actions are required (e.g. - Haz. Mat Unit, vacuum truck, etc.). Discharges are issued NOVs and/or citations - and cleanup orders whenever appropriate.**

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

**Complaints are being handled promptly and records kept. No changes are identified at this time.**

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

**N/A. The City has no record of any permitted connections to the storm drain system.**

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**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 participates in cost sharing with the City of LA to monitor bacteria, metals and toxics in Ballona Creek. \$30,000 was budgeted for total monitoring, FY 2010/11 costs.**

**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:

**Attachment submitted.**

1. An assessment of your agency's compliance with permit requirements, based on your responses to the questions in this form;
  2. Descriptions of any evaluation methods that your agency uses to determine the effectiveness of your storm water management program;
  3. A summary of the strengths and weaknesses of your agency's storm water management program;
  4. A list of specific program highlights and accomplishments;
  5. A description of water quality improvements or degradation in your watershed over the past fiscal year;
  6. Interagency coordination between cities to improve the storm water management program;
  7. Future plans to improve your agency's storm water management program; and
  8. 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.  
**10.**
- C. List any suggestions your agency has for improving program reporting and assessment. **No suggestions at this time.**

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**Attachment U-4**

**VII. Certification Statement**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.

Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility, of a fine and imprisonment for knowing violations.

Executed on the \_\_\_ day of \_\_\_\_\_, 20\_\_,

at \_\_\_\_\_.

Printed Name \_\_\_\_\_ Title \_\_\_\_\_

(Signature) \_\_\_\_\_

**Signature by duly authorized representative**