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Reporting Year 2010-2011

I. Program Management

A. Permittee Name: City of Pico Rivera

B. Permittee Program Supervisor: Art Cervantes
Title: Interim Director of Public Works
Address: 6615 Passons Blvd.
City: Pico Rivera Zip Code: 90660
Phone: 562.801.4415 Fax: 562.949.2525

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.

Response: The Department of Public Works is responsible for providing overall storm water program coordination among the NPDES-affected City departments. Public works is also impacted by most municipal NPDES permit tasks.

TABLE 1

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

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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 Funds.

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

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TABLE 2

Program Element	Expenditures in Previous Fiscal Year	Estimated Amount Needed to implement Order No. 01-182
Program management 6. Administrative costs 7. Capital costs	$114,000.00 $70,000.00	$114,000.00 $70,000.00
Public Information and Participation a. Public Outreach/Education b. Employee Training c. Corporate Outreach d. Business Assistance	$4,973.00	$4,973.00
3. Industrial/Commercial inspection/ site visit activities		
4. Development Planning	$14,000.00	$14,000.00
5. Development Construction a. Construction inspections		
Public Agency Activities 4. Maintenance of structural and treatment control BMPs 5. Municipal street sweeping 6. Catch basin cleaning 7. Trash collection/recycling 8. Capital costs 9. Other	$1000.00 $334,835.13 $10,000.00 $3,280,680.00	$1000.00 $334,835.13 $10,000.00 $3,280,680.00
7. IC/ID Program a. Operations and Maintenance b. Capital Costs	$42,000.00	$42,000.00
8. Monitoring	LA County	$5000.00
9. Other (NPDES consultant)	$19,000.00	$30,000.00
10. TOTAL	$3,890,488.13	$3,906,488.13

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

General NPDES compliance assistance (TECS Environmental)

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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:

D. A description of the pollutants that are in exceedance and an analysis of possible sources;

E. A plan to comply with the RWL (Permit, Part 2);

F. Changes to the SQMP to eliminate water quality exceedances;

G. Enhanced monitoring to demonstrate compliance; and

H. 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.

SQMP was completed long ago.

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.

Not applicable.

E. Watershed Management Committees (WMCs)

1. Which WMC are you in? San Gabriel River
2. Who is your designated representative to the WMC? Adrian Diaz or Ray Tahir
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.

WMC meetings continue to be helpful in communicating information that contributed to facilitating compliance with various MS4 permit programs. Additionally, these meetings presented valuable information regarding TMDLs and pollution-specific 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.

Ordinance can be viewed on the City's website.

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.

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? 143

b) How many storm drain inlets were marked with a no dumping message in the last fiscal year? 143

c) What is the total number of storm drain inlets that are legibly marked with a no dumping message? 143

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.

Not applicable.

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.

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

Task has been completed.

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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? 1.888.CLEANLA

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? 12

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

Calls that are referred to the City by the County Hotline are referred to the public works department for investigation of the complaint under the IC/ID program. Field inspections and follow-up inspections are performed.

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? Not applicable.

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)*

Not applicable.

b) Did the Principal Permittee organize quarterly Public Outreach Strategy meetings that you were aware of? Yes ☒ No ☐

How many Public Outreach Strategy meetings did your agency participate in last year? 4

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

The City's consultant attended each quarterly meeting. On occasion, the City sent staff as well.

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

Foremost are general audience outreach materials that address the problems with various pollutants (including but not limited to paint, fertilizers, fecal material, etc.). Also valuable are the public service announcements.

List suggestions to increase the usefulness of quarterly meetings:

Focus more attention on the TMDL-related pollutants.

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? Over 500,000

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

The City has deferred to the County of Los Angeles in continuing to notify schools in the county about runoff pollution and prevention issues.

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.

Not applicable.

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).*

Not applicable.

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)?*

Not applicable.

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

Not applicable.

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

Not applicable.

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. NA

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.

Materials are made available at City Hall and other City facilities.

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5. Businesses Program

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

   Not applicable.

   b) How many corporate managers did your agency *(Principal Permittee only)* reach last year? Not applicable.

   c) What is the total number of corporations to be reached through this program *(Principal Permittee only)*? Not applicable.

   d) Is your agency meeting the requirement of reaching all gas station and restaurant corporations once every two years *(Principal Permittee only)*? Not applicable. Yes ☐ No ☐

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

   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.

   Not applicable.

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

   How many media outlets were contacted? Please consult with the Principal Permittee, which is exclusively subject to this requirement.

   Which newspapers or radio stations ran them? The City understands that the Los Angeles Times, the Wave, and KLOS were contacted.

   Who was the audience? General

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7. Did you supplement the County's media purchase by funding additional media buys? Indirectly, by way of the flood control assessment. Yes ☒ No ☐
   Estimated dollar value/in-kind contribution: $2000
   Type of media purchased: Print and radio/TV
   Frequency of the buys: Not applicable
   Did another agency help with the purchase? Unknown 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.
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?
   Who was the audience (businesses, schools, etc.)?
10. Did you participate in or publicize workshops or community events to discuss storm water pollution? Yes ☒ No ☐
    How many events did you attend? 4
11. Does your agency have a website that provides storm water pollution prevention information? Yes ☒ No ☐
    If so, what is the address? www.baldwinpark.com
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, general population sensitivity to this environmental concern has increased. This was validated by the results of a survey that was conducted by the Principal Permittee.

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

Make a stronger effort to inform permittees of the availability of various public education materials and developing outreach materials that are specific to priority pollutant issues for the San Gabriel River watershed. The Principal Permittee and the City, along with other watershed permittees, should collaborate on developing outreach materials that address trash and metals.

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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 data base was updated by the City shortly before the second round of inspections was conducted.

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
Industrial	N/A	N/A	N/A	N/A
Auto-related	N/A	N/A	N/A	N/A
RGOs	N/A	N/A	N/A	N/A
Restaurants	N/A	N/A	N/A	N/A

Comments/Explanation/Conclusion: First and second round of inspections were completed 4 years ago.

3. BMPs Implementation

Provide the reporting data as suggested in the following table.

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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
Industrial	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Auto-related	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
RGOs	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Restaurants	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Comments/Explanation/Conclusion: All required inspections were completed 4 years ago.

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)

Facilities by category	Number of Warning letters	Number of NOVs	Number of Referrals	Number of Other (Verbal Warnings Issued At the Time of Inspection)
Industrial	N/A	N/A	N/A	N/A
Auto-Related	N/A	N/A	N/A	N/A
Gas Stations	N/A	N/A	N/A	N/A
Restaurants	N/A	N/A	N/A	N/A
Comments/Explanation/Conclusion:	N/A: inspections were completed 3 years ago.			

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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: 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.

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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. The City employs and requires the CEQA environmental check list that was developed by California Office of the Secretary, Resources Agency

2. Does your agency have procedures to include the following .

   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.

   The City has moved away from mechanical structural controls (catch basin inserts, interceptors, etc.) in favor of infiltration controls, to the extent feasible.

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

   This document was submitted by the Principal Permittee to the regional board's storm water unit for review and comment three years ago.

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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.

SUSMP projects are now being reviewed by the City's NPDES consultant. To assure compliance with infiltration requirements mandated by the Regional Board, planning and engineering have been advised to "flag" suspected SUSMP projects as soon as they are introduced to the City and to forward the projects to the City's NPDES consultant for review and conditions-assignment. This process has given the project proponent ample time to propose infiltration controls before grading plans are submitted (this is because infiltration is grading dependent). For more information see uploaded SUSMP guidelines.

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	0
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	0

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

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

N/A – this requirement was implemented by March of 2003.

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8. After 2003, how many additional projects per year will require/did require implementation of SUSMP requirements as a result of the lower threshold? The City has no way of projecting such an estimate. The number of SUSMP projects declined during FY 2008-2009 because of the economy.

   Unknown.

9. 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? No, but the City is trying to qualify the Whittier Narrows and other spreading grounds as massive regional infiltration basins capable of easily meeting SUSMP numeric sizing criteria and most TMDLs. Or, perhaps as control to meet a "flow-based" surrogate parameter.

   Yes ☐ No ☒

10. 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? This was done several years ago.

    Yes ☒ No ☐

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

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

    1. Land Use Yes ☐ No ☒
    2. Housing Yes ☒ No ☐
    3. Conservation Yes ☐ No ☒
    4. Open Space Yes ☐ No ☒

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

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12. How many targeted staff were trained last year? 24

13. How many targeted staff are trained annually? 24

14. What percentage of total staff are trained annually? 100%

15. Has your agency developed and made available development planning guidelines? Yes ☒ No ☐

16. If no, what is the expected date that guidelines will be developed and available to developers?

17. What is the status of completion of the technical manual for siting and design of BMPs for the development community?

The principal permittee has developed a draft technical manual for this purpose, which is currently under regional board review. Though not approved, the City continues to use the manual as one as several reference tools, which has been helpful. The City has also referenced the County's LID manual as another SUSMP compliance resource.

D. Development Construction Program

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

The City fully implements the development construction program. With respect to 1 acre or more soil disturbing projects, the City compels compliance with GCASWP requirements. No grading permit is issued without the subject applicant showing evidence of having applied for GCASWP coverage (viz., a WDID number). Additionally, the applicant is required to certify that a SWPPP has been prepared. For projects that disturb less than 1 acre of soil, grading permits are conditioned on conforming with minimum BMPs prescribed by the City.

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? The City does not require L-SWPPPs, only SWPPPs are required under the General Construction Activity Stormwater Permit.

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 – City has no hillsides. — Yes ☐ No ☒

3. Attach one example of a local SWPPP - City does not have an example of an L-SWPPP because it does not allow their use as a substitute for a 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?

Please see above response under D.1.

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a. How many building/grading permits were issued to sites requiring Local SWPPPs last year? City does not allow L-SWPPP substitution. Further, the new GCASWP does not recognize L-SWPPPs. 1

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

c. How many building/grading permits were issued to construction site less than one acre in size last year? 2

d. How many construction sites were inspected during the last wet season? 2

5. 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

6. 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 by a Notice of Violation letter. If Non-compliance persists, the matter then becomes a code enforcement issue. However, verbal warnings, coupled with the threat of a stop work order or a referral to the regional board (if a GCASWP covered site is involved), has been sufficient to compel compliance.

7. 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

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E. Public Agency Activities (Part 4.F)

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

   a. Has your agency developed and implemented a response plan for sanitary sewer overflows that includes the requirements in Order 01-182? Yes ☒ No ☐

   b. How many sanitary sewer overflows occurred within your jurisdiction? 0

   c. How many did your agency respond to? 0

   d. Did your agency investigate all complaints received? 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:

   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. It should also be noted that the City is subject to SSO/WDR requirements and follows requirements for reporting and responding to sewer system releases.

   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:

   This program has been in effect prior to this requirement. As matter a preventative maintenance, the sewer system is periodically inspected (manually and through video surveys) for areas in need of repair. A priority is list is prepared and repair work is scheduled accordingly. In the event of an overflow or a release, the sewer is inspected to determine cause. Usually, however, overflows are due to rain intrusion.

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2. Public Construction Activities Management

a. What percentage of public construction sites 5 acres or greater in size did your agency obtain coverage under the State of California General Construction Activities Storm Water Discharge Permit? The City requires GCASWP coverage for projects that disturb 1 acre or more of soil by grading, clearing, and/or excavating. NA %

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

Not applicable.

c. What is the total number of active public construction sites? 0

How many were 5 acres or greater in size? 0

d. (After March, 2003) Did your agency obtain coverage under the State of California General Construction Activities Storm Water Discharge Permit coverage for public construction sites for sites one acre or greater? The City had no projects subject to GCASWP requirements. 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 ☐

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

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? None.

4. Landscape and Recreational Facilities Management

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

Briefly describe this protocol:

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:

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 have already been given 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 have also been encouraged – through 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: 72
Priority B: 39
Priority C: 32

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.

Not applicable.

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e. How many times were all Priority A basins cleaned last year? Once a year

f. How many times were all Priority B basins cleaned last year? Once a year

g. How many times were all Priority C basins cleaned last year? Once a year

h. How much total waste was collected in tons from catch basin clean-outs last year? County is responsible for cleaning-out catch basins. City has no data regarding the amount debris that it removes from them. Unknown

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. This information has already been submitted.

j. Did your agency place and maintain trash receptacles at all transit stops within its jurisdiction. This was done during the last permit year. 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? 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%

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? Prioritization is unnecessary since they are all inspected and cleaned-out annually. Debris in these structures is minimal and roughly the same in terms of accumulation. 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?

Maintenance/clean-outs are either performed by hand or mechanically with the use of a vacuum truck. Neither of these methods results in the discharge of contaminants or pollutants to the MS4.

s. Where is removed material disposed of?

Material is taken to the corporate yard where it is stored in a covered trash bins. The material is then taken to the City's landfill for disposal.

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? (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 ☐

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? None

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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? Note: Not applicable because there was none. Yes ☐ No ☐

   b. Were BMPs implemented to the extent that measures did not compromise public health and safety? Not applicable. 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? This task was completed during the 2002-2003 permit year. 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? This task was completed during the 2002-2003 permit year. Yes ☐ No ☒

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F. Illicit Connections and Illicit Discharges (IC/ID) Elimination Program (Part 4.G)

1. Attach a copy of your agency's IC/ID Elimination Implementation Program (Part 4.G.1.a.).

2. Attach a map of your storm drain system showing all permitted connections (if available), and the locations of all illicit connections and discharges that occurred last year (Part 4.G.1.b). If your agency has not completed this requirement, describe the status of the development of a baseline map, including an expected completion date.

This task was implemented by the February 3, 2003 deadline specified in the current MS4 permit. Illicit connections and discharges that were reported and investigated during the 2003-2004 were plotted on GIS and a copy of the required GIS files were transmitted to the principal permittee, a practice that has been in effect since November of 2004. A copy of the City's storm drain/catch basin GIS map has been uploaded. Please note that the City does not "permit" connections.

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. No illicit connections, however, were detected this year.

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, Arc View).

5. What is the total length of open channel that your agency owns and operates? N/A

6. What length was screened last year for illicit connections? This task was completed several years ago. N/A

7. What is the total length of closed storm drain that your agency owns and operates? County owns and operates the storm drain system N/A

8. What length was screened last year for illicit connections?

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

This requirement was completed several years ago. Field screening for storm drains less than 36" in diameter was limited to reports of suspected illicit connections from storm drain maintenance personnel while conducting catch basin clean-outs (regularly scheduled and unscheduled, based on reports of clogged catch basins).

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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 remove2 5d	# that resulted in enforcement action	# that resulted in *other* actions
10/11	0	0	0	0	0	0	0

11. Explain any *other* actions that occurred in the last year. Please note that the definition of illicit connections used by the Principal Permittee is not the same as the definition used by the City. According to the Principal Permittee an illicit connection is a non-permitted connection. The City's definition, on the other hand, is any connection through which an illicit discharge passes. Based on this definition, none was detected.

12. What is the average time it takes your agency to initiate an illicit connection investigation after it is reported? N/A

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

    b) If not, explain why.

    There were no such connections detected.

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
2010-11	0	0	0	0	0	0	0

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

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

    b) 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.

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

    In the event of a 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.

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

    Provide incentives to City field personnel to report suspect or actual illicit connections. Also, the City is developing a web-site that will allow for anyone to report an illicit connection or discharge. This will greatly improve the time it takes to report and respond to an illicit connection or discharge complaint. .

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

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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.

Response: The Principal Permittee has assumed responsibility for conducting in-stream monitoring in the San Gabriel River Watershed. The City plans to propose to perform end-of-pipe monitoring in the next MS4 permit.

VI. Assessment of Program Effectiveness

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

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

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

See the assessment below.

Program Effectiveness Summary

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

   Response: The City believes it has implemented each of the program tasks associated with the current and previous municipal NPDES permit. It must be presumed, therefore, that so doing has resulted in program effectiveness desired by the regional board. The municipal NPDES permit is, 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 outfall monitoring data, which the City will perform under the next MS4 permit.

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

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

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.

   Response:

   - The City has completed of all of its industrial and commercial inspections and was pleased to learn that there were no significant runoff pollution issues. During the second round, the City GPS-plotted locations of all inspected facilities. The data will be used to generate a GIS layer to facilitate the identification of "hot spots" as well as sources of illicit connections are discharges.

- The City has been prescribing, for the very most part, infiltration controls for various redevelopment projects (examples have been uploaded), as a prelude to implementing low impact development (LID) strategies.

- The City continues to explore the use of the spreading grounds located within the San Gabriel River system as well as off-site, sub-regional, macro infiltration basins to meet TMDL and SUSMP requirements.

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

   Response: We know of no improvements or degradation that has occurred in the upper portion of the San Gabriel River. In-stream monitoring has not, at least to the best of the City's knowledge, provided any compelling data in this regard. The City is aware that the Natural Resources Defense Council (NRDC) has noted exceedances in the San Gabriel River 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.

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

   Response: Interagency coordination has reached its maximum under the current scheme of things. It is expected that a sub-watershed based permit will result in better coordination in meeting water quality standards for the Upper San Gabriel River. This group will be able to focus specifically on sub-watershed issues, develop a sub-watershed monitoring program, and implement uniform BMPs in addressing common pollution issues.

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

   Response: As mentioned, the City plans to participate in a sub-watershed (Upper San Gabriel River Watershed Coalition MS4 permit). Managing pollution on a sub-watershed seems to be the most effective means of protecting beneficial uses. To that end, this group will prepare a separate MS4 permit for consideration by the Regional Board.

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

Response: 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

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

C. Suggestions for Improving Program Reporting and Assessment

Response: 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 information.