

**Regional Phase I MS4 NPDES Permit
Order No. R4-2021-0105
NPDES No. CAS004004**

**Annual Report Form
Reporting Year [22-23]**

Sections 2-8 of this form include items to be reported individually by each Permittee for this reporting year unless otherwise indicated.

Permittee Name	City of Santa Paula
Permittee Program Contact	Clete Saunier
Title	Public Works Director
Address	866 E. Main Street
City	Santa Paula
Zip Code	93060
Phone	805-933-4212
Email	csaunier@spcity.org

2. Legal Authority and Certification

Complete the items on this page.

2.1 Answer the following questions on Legal Authority [Order – VI.B.2].

Question	Yes	No
Is there a current statement certified by the Permittee’s chief legal counsel that the Permittee has the legal authority within its jurisdiction to implement and enforce each of the requirements contained in 40 CFR § 122.26(d)(2)(i)(A-F) and the Order?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Has the above statement been developed or updated within this reporting year? If yes, attach the updated legal authority statement to this report.	<input type="checkbox"/>	<input checked="" type="checkbox"/>


2.2 Complete the required certification below [Attachment D – V.B.5].

"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 fine and imprisonment for knowing violations."

Signature of either a principal executive officer, ranking elected official, or by a duly authorized representative of a principal executive officer or ranking elected official. A person is a duly authorized representative only if:

- The authorization is made in writing by a principal executive officer or ranking elected official.
- The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.)
- The written authorization is submitted to the Regional Board.

If an authorization of a duly authorized representative is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization will be submitted to the Regional Board prior to or together with any reports, information, or applications, to be signed by an authorized representative.

Signature: 

Title: Public Works Director

Date: 11/2/23

3. Program Expenditures

Complete the following items in this section.

3.1 Source(s) of funds used in this reporting year, and proposed for the next reporting year, to meet necessary expenditures on the Permittee's stormwater management program [Order – VI.C.2].

General Fund and Ventura Countywide Stormwater Benefit Assessment Program

3.2 Complete the table below on program expenditures for this reporting year [Attachment D – VII.A.5]. Enter “0” for any fields that do not apply.

Category		Capital Expenditures ¹	Land Costs	Personnel Cost	Consultant (s) Cost	Overhead Costs	Construction Costs	Permit(s), Operation, and Maintenance (O&M) Costs	Total Expenditures for this Reporting Year	Program Budget for Next Reporting Year
(1) Program Management²				\$13,415.08	\$179,073.78	\$6,765.18			\$199,254.04	\$195,203.49
(2) NPDES MS4 Permit Fees								\$21,913.00	\$21,913.00	\$30,000.00
(3) Minimum Control Measures (MCMs)	PIPP			\$618.60	\$1,769.30				\$2,387.90	\$3,862.70
	Industrial / Commercial Facilities Program									
	Planning & Land Development Program³									
	Construction Program									
	Public Agency									

¹ Exclude land costs.

² Including but not limited to program management plans, mail, legal support, travel, conferences, printing, producing manuals and handbooks, annual/semi-annual reporting, development and maintenance of any electronic databases required by this permit including GIS, and other non-labor costs.

³ Including but not limited to environmental review, development project approval and verification, and permitting and licensing costs specific to the provisions of the Order that are beyond the scope of a normal plan review, permitting, and inspection process.

Category		Capital Expenditures ¹	Land Costs	Personnel Cost	Consultant (s) Cost	Overhead Costs	Construction Costs	Permit(s), Operation, and Maintenance (O&M) Costs	Total Expenditures for this Reporting Year	Program Budget for Next Reporting Year
	Activities Program									
	IDDE Program									
	Additional Institutional BMPs / "Enhanced" MCMs									
(4) TMDL Implementation Plan / Watershed Management Program Development ⁴				\$1,468.20	\$18,060.70				\$19,528.90	\$9,989.0
(5) Projects ⁵	Distributed Projects and Green Streets									
	Regional Projects									

⁴ Include costs for development and/or revision of Implementation Plans (e.g., TMDL Implementation Plan, Watershed Management Programs including Reasonable Assurance Analysis). Specify which plans these are in Section 3.3.

⁵ If a Permittee is implementing a project collaboratively, the Permittee should only include the portion of the project cost that it is assuming.

Category		Capital Expenditures ¹	Land Costs	Personnel Cost	Consultant (s) Cost	Overhead Costs	Construction Costs	Permit(s), Operation, and Maintenance (O&M) Costs	Total Expenditures for this Reporting Year	Program Budget for Next Reporting Year
	Other Structural BMPs									
(6) Trash Compliance	Trash TMDLs ⁶									
	Discharge Prohibitions - Trash ⁷									\$50,000.00
(7) Monitoring	Monitoring Plan Development ⁸			\$1,154.40	\$2,124.60				\$3,279.00	\$1,786.50
	Outfall and Receiving Water Quality Monitoring	\$354.90		\$4,049.10	\$2,704.60	\$10.70			\$7,119.30	\$11,497.50

⁶ Includes full capture, partial capture, and institutional controls used to comply with trash TMDLs.

⁷ Includes full capture, partial capture, and institutional controls used to comply with Statewide Trash Provisions.

⁸ Includes costs to develop and/or revise monitoring plans (e.g., TMDL Monitoring Plan, IMP, CIMP, non-stormwater screening and monitoring program). Specify which plans these are in Section 3.3.

Category		Capital Expenditures ¹	Land Costs	Personnel Cost	Consultant (s) Cost	Overhead Costs	Construction Costs	Permit(s), Operation, and Maintenance (O&M) Costs	Total Expenditures for this Reporting Year	Program Budget for Next Reporting Year
	BMP Effectiveness Monitoring									
	Regional Studies⁹			\$1,215.60	\$3,833.00				\$5,048.60	\$7,686.50
	Special Studies¹⁰									
(8) Other¹¹				\$1,337.80	\$10,443.54				\$11,781.34	\$796.00
TOTAL		\$354.90	\$0	\$23,258.78	\$218,009.52	\$6775.88	\$0	\$21,913.00	\$270,312.08	\$310,821.69

3.3 Additional Information: Please add any additional comments on stormwater expenditures below.

(7) Monitoring – Regional Studies includes SMC/SCCWRP membership costs

(8) Other – Includes personnel time related to Implementation Agreement renewal and Santa Clara River bacterial TMDL MOA costs.

⁹ Includes costs to comply with Part X (Regional Studies) of the Attachment E-MRP.

¹⁰ Includes costs to comply with Part XI (Special Studies) of the Attachment E-MRP.

¹¹ Enter costs in this table but specify what this “Other” category consists of in Section 3.3.

4. Non-Stormwater Discharge Prohibitions

Complete the following items in this section.

4.1 Provide an assessment of the effectiveness of the Permittee’s control measures in effectively prohibiting non-stormwater discharges into the MS4 to the receiving water [Order – III.A].

The City of Santa Paula prohibits non-stormwater discharges through its adopted municipal codes, implementation of its stormwater, illicit discharge and other programs, and when necessary enforces its stormwater pollution control measures within the City’s limits.

4.2 Describe sources of non-stormwater discharges determined to be a NPDES permitted discharge, a discharge subject to CERCLA, a conditionally exempt non-stormwater discharge, or entirely comprised of natural flows [Order - III.A.2].

Authorized non-stormwater discharges from emergency and essential non-emergency firefighting activities; Uncontaminated groundwater infiltration; Landscape irrigation; Dechlorinated/dibrominated swimming pool/spa discharges; Dewatering of decorative fountains; Non-commercial car washing by residents and non-profit organizations; and Street/sidewalk wash water.

4.3 Check all that apply [Order – III.A.4].

There has been non-stormwater discharge(s) to an ASBS	<input type="checkbox"/>
The non-stormwater discharge(s) to the ASBS caused or contributed to an exceedance receiving water limitations, WQBELs, water quality objectives in Chapter II of the Ocean Plan, or an undesirable alteration in natural ocean water quality in an ASBS	<input type="checkbox"/>
Additional BMPs were implemented to address the exceedances above	<input type="checkbox"/>

4.4 If you had non-stormwater discharge(s) to an ASBS that caused or contributed to an exceedance receiving water limitations, WQBELs, water quality objectives in Chapter II of the Ocean Plan, or an undesirable alteration in natural ocean water quality in an ASBS, describe what additional BMPs were implemented to address these exceedances. How effective were those BMPs in addressing the exceedances? [Order - III.A.4.b]

Not applicable

4.5 Did you develop and implement procedures to ensure that a discharger, if not a named Permittee in this Order, fulfilled the requirements of Part III.A.5.a.i-vi? If so, provide a link to where the procedures may be found or attach to this Annual Report [Order – III.A.5.a].

Yes. The City’s municipal code, including provisions and procedures for stormwater can be found here: https://codelibrary.amlegal.com/codes/santapaula/latest/santapaula_ca/0-0-0-48044

4.6 Did you organize and maintain records of all notifications, local permits, and non-stormwater discharges greater than 100,000 gallons in an electronic database? (Yes or No) [Order – III.A.5.b]

Yes. The City maintains records of all illicit connections and illicit discharges. There were no reported discharges of greater than 100,000 gallons during this reporting year.

4.7 Did you determine that any of the conditionally exempt non-stormwater discharges, with the exception of essential non-stormwater discharges, identified per Part III.A.5.c of the Order is a source of pollutants that causes or contributes to an exceedance of applicable receiving water limitations and/or water quality-based effluent limitations? If so, how many of the conditionally exempt non-stormwater discharges in Part III.A.3.b of the Order did you determine to be sources of pollutants that caused or contributed to an exceedance of receiving water limitations or WQBELs? If you made that determination, which type(s) of non-stormwater discharges in Part III.A.3.b were sources of pollutants? [Order – III.A.6]

No

4.8 If you answered yes to the question 4.7 above, check all that apply [Order – III.A.6].

Effectively prohibit the non-stormwater discharge into the MS4	<input type="checkbox"/>
Impose conditions in addition to those in Table 5 of the Order, subject to approval by the Los Angeles Water Board Executive Officer, on the non-stormwater discharge such that it will not be a source of pollutants	<input type="checkbox"/>
Require diversion of the non-stormwater discharge to the sanitary sewer	<input type="checkbox"/>
Require treatment of the non-stormwater discharge prior to discharge to the receiving water	<input type="checkbox"/>

5. Non-Stormwater Outfall Screening and Monitoring

Complete the following items in this section.

5.1 Complete the tables below regarding your Non-Stormwater Outfall-Based Screening and Monitoring Program [Attachment E – VII].

Receiving Water	No. of Outfalls within your Jurisdiction	No. of Outfalls Screened during this Reporting Year	No. of Screening Events During This Reporting Year	Outfalls with Significant Non-Stormwater Discharges ¹²			
				Total Confirmed	Total Abated	Total Attributed to Allowable Sources ¹³	Total Being Monitored
[RW 1]	N/A	0	0	N/A	N/A	N/A	N/A
(add rows as needed)							
Total	N/A	0	0	N/A	N/A	N/A	N/A

Method of Abatement	Total No.
Low Flow Diversion (LFD)	N/A
Illicit Discharges Eliminated	1
NPDES Permitted	N/A
Retention	N/A
Discharge No Longer Observed	1
Other (describe in Section 5.3)	N/A

5.2 Los Angeles County Permittees: Did you consider dry weather receiving water monitoring data downstream of the outfalls and other relevant information to determine if re-screening is necessary for any of the previously screened outfalls that did not have significant non-stormwater discharge? If so, explain how many outfalls require re-screening and when re-

¹² “Significant Non-Stormwater Discharges” as identified by the Permittee per Part VII.B of the Attachment E - MRP.

¹³ “Allowable Sources” refers to the discharges exempt from the Prohibition of Non-Stormwater Discharges listed in Part III.A.2 of the Order.

screening will be completed. If applicable, describe any changes made to the program [Attachment E – VII.D.2].

N/A

5.3 Additional Information. If desired, provide additional information regarding Non-Stormwater Outfall Screening and Monitoring.

During this reporting period, The City of Santa Paula has not yet initiated the Non-Stormwater Outfall-Based Monitoring requirement.

6. Minimum Control Measures – Please see attached MCM forms

Complete the following items in this section.

6.1 General Provisions [Order – VIII.A.3]

Did you train all your employees in targeted positions (whose interactions, jobs, and activities affect stormwater quality) on the requirements of the Minimum Control Measures in this Order, or did you ensure contractors performing privatized/contracted municipal services are appropriately trained to: (a) Promote a clear understanding of the potential for activities to pollute stormwater, (b) Identify opportunities to require, implement, and maintain appropriate BMPs in their line of work? (Yes or No)

Yes

6.2 Public Information and Participation Program [Order - VIII.D]

Complete the following item regarding the Public Information and Participation Program.

6.2a) Summarize opportunities created for public engagement in stormwater planning and program implementation to raise public awareness of stormwater program benefits and needs (e.g., *Don't Trash California* campaign). Note whether activities were performed by the jurisdiction or as part of a watershed, regional, or county-wide group [VIII.D.3.a].

Refer to Minimum Control Measures reporting forms attached.

6.2b) Summarize educational activities and public information activities to facilitate stormwater and non-stormwater pollution prevention and mitigation. What pollutants were targeted? What audiences were targeted? Note whether activities were performed by the jurisdiction or as part of a watershed, regional, or county-wide group [VIII.D.3.b].

Refer to Minimum Control Measures reporting forms attached.

6.2c) In selecting targeted pollutants for public information/education topics, did you consider the proper management and disposal of (1) vehicle wastes (e.g., used oil, used tires); (2) household waste materials (i.e., trash and household hazardous waste, including personal care products, pharmaceuticals, and household cleaners); (3) pesticides, herbicides, and fertilizers; (4) green waste; and (5) animal wastes? (Yes or No) If no, what other materials were considered? [VIII.D.3.b.i]

Refer to Minimum Control Measures reporting forms attached.

6.2d) Which of the following methods were selected to distribute public information/ educational materials? [VIII.D.3.b.ii]

Category	Yes	No
Internet-based platforms (e.g., stormwater websites, social media websites and applications)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Commercial points-of-purchase (e.g., automotive parts stores, home improvement centers/ hardware stores/ paint stores, landscape / gardening centers, pet shops)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools (K- 12)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Radio/television	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Community events	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other (specify)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

6.2e) Did you document and track information on the implemented Public Information and Participation activities including activity, date(s), method of dissemination, targeted behavior, targeted pollutant, targeted audience, culturally effective method(s), other information necessary for the metrics identified in Part VIII.D.4.a of the Order, and metric for measuring effectiveness? (Yes or No) [VIII.D.4.b]

Yes

6.2f) What metrics did you use to measure the effectiveness in achieving the objectives of the Public Information and Participation Program? Considering those metrics, is your Public Information and Participation program effective? Explain [VIII.D.4.a].

Refer to Minimum Control Measures reporting forms attached.

6.2g) Additional Information. If desired, provide additional information regarding implementation of the Public Information and Participation Program.

6.3 Industrial and Commercial Facilities Program [Order – VIII.E]

Complete the following items regarding the Industrial and Commercial Facilities Program.

6.3a) Watershed-Based Inventory:

Question	Yes	No
Have you updated your watershed-based inventory or database of all industrial and commercial facilities within your jurisdiction that are critical sources ¹⁴ of stormwater pollution identified in Part VIII.E.2 of the Order (inventory shall be updated at least once every 2 years)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6.3b) If you answered yes to question 6.3a above, what is the total number of facilities in your inventory list?

N/A

6.3c) If you answered no to question 6.3a above, when will you update the inventory list?

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6.3d) Commercial Facilities [VIII.E.3]:

Question	Response
In implementing the Outreach Program, how many commercial facilities did you reach out to during this reporting year?	<i>Refer to Minimum Control Measures Reporting forms attached.</i>
In implementing the Business Assistance Program, how many commercial facilities did you assist during this reporting year?	<i>Refer to Minimum Control Measures Reporting forms attached.</i>
How many commercial facilities did you inspect during this reporting year?	<i>Refer to Minimum Control Measures Reporting forms attached.</i>
Of the commercial facilities inspected during this reporting year, how many were the first, second, third, etc. round of inspections? For example, report x number of first-round inspections, y number of second-round inspections, z number of third-round inspections, etc. Each round of inspections corresponds to the requirement to conduct an inspection every two years.	<i>Refer to Minimum Control Measures Reporting forms attached.</i>
How many of the total commercial facility inspections had stormwater violation(s) during this reporting year?	<i>Refer to Minimum Control Measures Reporting forms attached.</i>

¹⁴ Part VIII.E.2.a of the Regional MS4 Permit summarizes “critical sources” to be tracked.

6.3e) Industrial Facilities [VIII.E.4]:

Question	Response
How many facilities from question 6.3b are industrial facilities with SIC codes that require enrollment in the IGP? (in this reporting year)?	<i>Refer to Minimum Control Measures Reporting forms attached.</i>
How many industrial facilities did you report to the Los Angeles Water Board as non-filers during this reporting year?	<i>Refer to Minimum Control Measures Reporting forms attached.</i>
In implementing the Business Assistance Program, how many industrial facilities did you assist during this reporting year?	<i>Refer to Minimum Control Measures Reporting forms attached.</i>
How many Industrial facilities did you inspect during this reporting year?	<i>Refer to Minimum Control Measures Reporting forms attached.</i>
Of the industrial facilities inspected during this reporting year, how many were the first, second, third, etc. round of inspections? For example, report x number of first-round, y number of second-round, and z number of third-round, etc. Each round of inspections corresponds to the requirement to conduct an inspection every two years.	<i>Refer to Minimum Control Measures Reporting forms attached.</i>
How many of the total industrial facility inspections had stormwater violation(s) during this reporting year?	<i>Refer to Minimum Control Measures Reporting forms attached.</i>

6.3f) Enforcement Actions: Describe the number and nature of any enforcement actions taken related to the industrial and commercial facilities program [VIII.E.6].

Refer to Minimum Control Measures reporting forms attached.

6.3g) Additional Information. If desired, provide additional information regarding implementation of the Industrial and Commercial Facilities Program.

Refer to Minimum Control Measures reporting forms attached.

6.4 Planning and Land Development Program [VIII.F]

Complete the following items regarding the Planning and Land Development Program.

- 6.4a) Priority Development Projects: Complete the table below for Priority Development Projects as of the end of this Reporting Year [VIII.F.1]. *Refer to Minimum Control Measures reporting forms attached.*

Development Type	Number of Priority Development Projects Completed During This Reporting Year	Number of Priority Development Projects In-Progress
New Development		
Redevelopment		

- 6.4b) Use of Alternative Compliance Measures for Priority Development Projects. Provide the number of Priority Development Projects completed during this Reporting Year that utilized alternative compliance measures per Part VIII.F.4.b of the Order.

Category	Number of Projects
On-site Biofiltration	
On-site Flow-based BMPs	
Off-site Infiltration	
Groundwater Replenishment Projects	
Off-site Retrofit Projects	
Other	

- 6.4c) Exemptions to Priority Development Project Performance Requirements. If the Permittee is implementing an approved Local Ordinance Equivalence or an approved Regional Stormwater Mitigation Program per Part VIII.F.1.c, describe the area covered by these exemptions; and the number and names of Priority Development Projects that were exempted from the Order’s Priority Development Project Structural BMP Performance Requirements.

Refer to Minimum Control Measures reporting forms attached.

- 6.4d) Priority Development Project Greater Than 50 Acres. If applicable, provide information on any Priority Development Projects with a project area greater than 50 acres that were completed during this Reporting Year or are currently in-progress. Information should include the name and location of the project(s) and whether the project(s) are new development or redevelopment.

Refer to Minimum Control Measures reporting forms attached.

6.4e) Hydromodification Management: If applicable, provide information on the name, location, and nature of any projects requiring hydromodification controls that were completed or in-progress within this Reporting Year [VI.F.2].

Refer to Minimum Control Measures reporting forms attached.

6.4f) Exemptions to Hydromodification Controls: Are there any areas where assessments of downstream channel conditions and proposed discharge hydrology indicate that adverse hydromodification effects to beneficial uses of Natural Drainage Systems are unlikely, per Part VIII.F.2.b? If so, what are the numbers and names of the New Development and Redevelopment projects exempt from implementation of hydromodification controls?

Refer to Minimum Control Measures reporting forms attached.

6.4g) Tracking, Inspection and Enforcement of Post-Construction BMPs: Describe the number and nature of any enforcement actions taken related to the planning and land development program [VIII.F.3.c.v]. **Provide information for 6.4g in Section 6.4h**

Question	Yes	No
Does your program implement a GIS or other electronic system for tracking Priority Development Projects and Hydromodification Management Projects that at a minimum contains all the information required by Permit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Does your program inspect all Priority Development Projects and Hydromodification Management Projects upon completion of construction and prior to issuance of occupancy certifications to ensure proper installation of post-construction BMPs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

6.4h) Additional Information. If desired, provide additional information regarding implementation of the Planning and Land Development Program.

Not applicable

6.5 Construction Program [Order – VIII.G]

Complete the following items regarding the Construction Program.

Refer to Minimum Control Measures reporting forms attached.

6.5a) Complete the table below. Only report numbers for sites less than 1 acre.

Question	Response
How many new sites of less than one acre commenced their activities during this reporting year?	
How many sites of less than one acre did you inspect during this reporting year?	

Question	Response
How many (if any) of the sites from the previous question had a BMP violation [VIII.G.4.b]?	

6.5b) Complete the table below. Only report numbers for sites 1 acre or greater and construction sites less than 1 acre that are part of a common plan of development totaling 1 acre or greater.

Question	Response
What is the date of the latest update made to the site inventory [VIII.G.5.b]?	
How many new sites of 1 acre or greater commenced their activities during this reporting year?	
How many sites of 1 acre or greater did you report to the Los Angeles Water Board as non-filers [VIII.G.5.a]?	
How many post-construction plans were reviewed during this reporting year [VIII.G.5.a]?	
How many of the plans from the previous question were approved during this reporting year?	
How many (if any) sites of 1 acre or greater did you inspect during this reporting year [VIII.G.5.c]?	
How many (if any) of the inspected sites were in violation of construction BMPs?	
How many (if any) of the inspected sites were in violation of post-construction plans?	
How many of the sites from the previous two questions were reported to the Los Angeles Water Board along with an inspection report?	

6.5c) Enforcement Actions: Describe the number and nature of any enforcement actions taken related to the development construction program [VIII.G.6].

Refer to Minimum Control Measures reporting forms attached.

6.5d) Additional Information. If desired, provide additional information regarding implementation of the Construction Program.

Not applicable

6.6 Public Agency Activities Program [VIII.H]

Complete the following items regarding the Public Agency Activities Program.

6.6a) Answer the following questions regarding the Public Agency Activities Program.

Refer to Minimum Control Measures reporting forms attached.

Question	Response
Did you maintain an updated inventory or database of all your owned or operated (i.e., public) facilities and activities within your jurisdiction that are potential sources of stormwater pollution? [VIII.H.2]	<input type="checkbox"/> Yes <input type="checkbox"/> No
For the above inventory, what is the date of the latest update [VIII.H.2.c]?	
How many treatment control BMPs including post-construction control treatment BMPs do you own? [VIII.H.2.b.vi]	
For the above, how many inspections were conducted during this reporting year? [VIII.H.3.e]	
How many storm drain inlets do you own?	
How many of the above are labeled with a legible “no dumping” message? [VIII.H.6.c.i]	
Did you inspect the legibility of all the stencils or labels nearest each inlet prior to the wet season during this reporting year? [VIII.H.6.c.ii]	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes for the above, how many illegible stencils and labels were recorded?	
For the illegible stencils and labels recorded above, how many were re-stenciled and re-labeled within 180 days of inspection? For those not re-stenciled and re-labeled, explain why not. [VIII.H.6.c.iii]	
Did you visually monitor owned open channels and other drainage structures for trash and debris at least annually? [VIII.H.6.d.]	<input type="checkbox"/> Yes <input type="checkbox"/> No
How many miles of open channels do you own?	
Did you remove trash and debris from your open channels a minimum of once per year before the wet season? [VIII.H.6.d.ii]	<input type="checkbox"/> Yes <input type="checkbox"/> No
How many parking lots exposed to stormwater do you own that meet either criteria listed in Part VIII.H.9?	
Did you inspect Permittee-owned parking lots exposed to stormwater that meet either criteria listed in Part VIII.H.9 at least twice per month?	<input type="checkbox"/> Yes <input type="checkbox"/> No
For the above, how many inspections were conducted during this reporting year? [VIII.H.9]	
For the owned parking lots exposed to stormwater, how many cleanings were conducted in total for this reporting year? [VIII.H.9]	

6.6b) Street Sweeping: Complete the table below [VIII.H.8].

	Total Miles of Street ¹⁵ in Priority Category	Frequency of Street Sweeping (e.g., Twice a Month, Monthly, Annually)	Additional Notes
Priority A			
Priority B			
Priority C			

6.7 Illicit Discharge Detection and Elimination (IDDE) Program [Order – VIII.I]

Complete the following items regarding the Illicit Discharge Detection and Elimination Program.

Refer to Minimum Control Measures reporting forms attached.

6.7a) IDDE Investigations: Complete the table below. Include illicit discharges detected through other inspection programs.

	Number of Reported Illicit Discharges	Number of Investigations	Number Eliminated	Number Permitted or Exempt	If Not Eliminated or Permitted / Exempt, Explain.
Illicit Discharges					

6.7b) Enforcement Actions: Describe the number and nature of any enforcement actions taken related to illicit discharge detection and elimination program [Order – VIII.I.7].

Refer to Minimum Control Measures reporting forms attached.

6.7c) What means were provided to the public for public reporting of illicit discharges and other water quality impacts from stormwater and non-stormwater discharges into or from MS4s? [VIII.I.6]

Category	Yes	No
Telephone hotline	<input type="checkbox"/>	<input type="checkbox"/>
Email address	<input type="checkbox"/>	<input type="checkbox"/>
Web-based form / reporting portal	<input type="checkbox"/>	<input type="checkbox"/>
Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>

6.7d) Did you document all public reports of illicit discharges and track all investigations? If no, explain why. [Order – VIII.I.8]

¹⁵ Permittees shall report the length of street swept in the “total miles of street” and/or “total curb miles of street”, depending on data availability.

Refer to Minimum Control Measures reporting forms attached

6.7e) Additional Information. If desired, provide additional information regarding implementation of the Illicit Discharge Detection and Elimination Program.

Not applicable

7. Trash Reporting

Complete the following items in this section.

7.1 Trash TMDL Compliance [Order – IV.B.3]

7.1a) If you are subject to Trash TMDLs, complete and attach the provided “Trash TMDL Reporting Forms” in Attachment I of the Order for each applicable Trash TMDL. Report your compliance with the applicable interim and/or final Effluent Limits for trash below. If compliance with the applicable interim and/or final Effluent Limits for trash has not been achieved, explain why.

N/A

7.1b) Mark the compliance approach you have implemented for any applicable Trash TMDLs.

- Full Capture Systems
- Mass Balance
- Scientifically Based Alternative
- Minimum Frequency of Assessment and Collection

7.1c) Complete the table below regarding the catch basins within your jurisdiction.

	Retrofitted with Full Capture Systems	Retrofitted with Partial Capture Devices	Retrofitting Infeasible	Not Retrofitted	Total Number of Catch Basins within Jurisdiction
Owned					
Not Owned					
Total					

N/A

7.1d) If relying on full capture systems, are the maintenance records of the full capture systems within your jurisdiction up-to-date and available for inspection by the Los Angeles Water Board? [Order – IV.B.3.b.i.(c)]

N/A

7.1e) If implementing a Plastic Pellet Monitoring and Reporting Plan (PMRP), report any known spills (including names and locations) from preproduction plastic (i.e., plastic pellet) generating, transfer, processing, and storage facilities within this reporting year, explain the actions taken for cleanup, and describe the measures taken to prevent future incidents.

N/A

7.1f) If implementing a PMRP, how many new preproduction plastic generating, transfer, processing, and storage facilities have been added in Permittee's jurisdiction within this reporting year that have not been addressed in the PMRP?

N/A

7.2 Trash Discharge Prohibitions Compliance [Order – III.B]

7.2a) For areas not addressed by a Trash TMDL, and for Permittees that have regulatory authority over Priority Land Uses (PLUs) or Designated Land Uses, indicate the compliance method that was selected in response to the Los Angeles Water Board's 13383 Order issued on August 18, 2017 as the method to comply with the prohibition of discharge in PLUs within Permittee's jurisdiction.

- Track 1 (Complete items 7.2b – 7.2e)
- Track 2 (Complete items 7.2f – 7.2l)

7.2b) If using Track 1 compliance, complete the table below regarding the catch basins within PLUs, designated land uses, and equivalent alternate land uses in your jurisdiction.

	Retrofitted with Full Capture Systems	Retrofitting Infeasible	Not Retrofitted	Total Number of Catch Basins within Jurisdiction
Owned	7			108
Not Owned				
Total	7			108

7.2c) If using Track 1 compliance, complete and attach the "Trash Discharge Prohibitions Reporting Form" provided in Attachment I of the Order for PLUs, designated land uses, and equivalent alternate land uses within your jurisdiction.

Attachment I attached

7.2d) If using Track 1 compliance, provide a map showing the location and drainage area in PLUs, designated land uses, and equivalent alternate land uses within your jurisdiction served by full capture systems.

Not yet available

7.2e) If using Track 1 compliance, did you properly operate and maintain all full capture systems in PLUs, designated land uses, and equivalent alternate land uses within your jurisdiction?

Yes

7.2f) If using Track 2 compliance, complete the table below regarding the catch basins within PLUs, designated land uses, and equivalent alternate land uses in your jurisdiction.

	Retrofitted with Full Capture Systems	Retrofitted with Partial Capture Devices	Not Retrofitted	Total Number of Catch Basins within Jurisdiction
Owned				
Not Owned				
Total				

N/A

7.2g) If using Track 2 compliance, provide a map of the location and drainage area in PLUs, designated land uses, and equivalent alternate land uses within your jurisdiction served by full capture systems, multi-benefit projects, other treatment controls, and/or institutional controls.

N/A

7.2h) If using Track 2 compliance, did you properly operate and maintain all full capture systems, multi-benefit projects, treatment controls, and/or institutional controls in PLUs, designated land uses, and equivalent alternate land uses within your jurisdiction?

N/A

7.2i) If using Track 2 compliance, explain what type of and how many treatment controls, institutional controls, and/or multi-benefit projects have been used and in what locations?

N/A

7.2j) If using Track 2 compliance, what is the effectiveness of the total combination of treatment controls, institutional controls, and multi-benefit projects employed? Explain the metric to measure the effectiveness.

N/A

7.2k) If using Track 2 compliance, explain whether the amount of trash discharged from the MS4 decreased from the previous year. If so, by how much? If not, explain why. To determine the amount of trash discharged from the MS4 and to report on progress towards achieving the interim/ final compliance, provide the results of the trash levels using the methodology identified in the Trash Implementation Plan (e.g., Visual Trash Assessment Approach or other equivalent trash assessment methodology).

N/A

7.2l) If using Track 2 compliance, explain whether the amount of trash in the MS4's receiving water(s) decreased from the previous year. If so, by how much? If not, explain why.

N/A

8. Additional Information (Optional)

Provide any additional information in this section.

You may use this section to report any additional information not specified in Sections 2-7 such as information better presented outside of the report form structure, data limitations that prevented the required information from being obtained, and additional detailed summary table describing control measures.

N/A

**Compliance Summary Report:
 Certified Full Capture Systems**

Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10
Reporting Year	Total Area	Total Area Served by FCSs	Percentage of Area Served by FCSs	Total # CBs	Total # CBs Served by FCSs	Percentage of CBs Served by FCSs	Required Trash Abatement (%)	Compliance	Comments
15-Dec-2022			N/A	100	7	7%			
15-Dec-2023				108	7	6%			
15-Dec-2024									
15-Dec-2025									
15-Dec-2026									
15-Dec-2027									
15-Dec-2028									
15-Dec-2029									
15-Dec-2030									
Notations:									
Form	Either report compliance using Priority Land Use (PLU), designated land uses, and equivalent alternate land use areas served by FCSs (Columns 2 through 4) and/or number of catch basins in PLU, designated land uses, and equivalent alternate land use areas served by FCSs (Columns 5 through 7).								
Column 1:	Reporting Year: The reporting year per Attachment E- Part XIV.A								
Column 2:	Total PLU, designated land uses, and equivalent alternate land use area of jurisdiction (square kilometers)								
Column 3:	Total PLU, designated land uses, and equivalent alternate land use area of jurisdiction served by FCSs (square kilometers)								
Column 4:	Percentage of PLU, designated land uses, and equivalent alternate land use area of jurisdiction served by FCSs (Col. 4/Col. 3)								
Column 5:	Total number of catch basins (CBs) in PLUs, designated land uses, and equivalent alternate land use within jurisdiction								
Column 6:	Total number of catch basins (CBs) in PLUs, designated land uses, and equivalent alternate land use served by FCSs within jurisdiction								
Column 7:	Percentage of CBs in PLUs, designated land uses, and equivalent alternate land use served by FCSs within jurisdiction (Col. 6/Col. 5)								
Column 8:	Required Trash Abatement: Part III.B.2.d of the Order								
Column 9:	Compliance: Yes, if Col. 4 and/or Col. 7 is greater than Col. 8; No, if Col. 4 and/or Col. 7 is less than Col.8								
Column 10:	Provide comments, if necessary.								

Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11
Certified FCS(s) Installed	FCS Location	Nearest Cross Street	FCS Owner	FCS Maintained By	FCS Installation Date	CB ID No. Served by FCS	CB Type	CB Owner	CB Maintained By	Frequency of FCS Maintenance and other O&M Comments
Flexstorm	11th at Main St, Southeast Corner		CI	CI	7/15/2020		Inserts	CI	CI	Annually
Flexstorm	506 Main St. South Curb		CI	CI	7/15/2020	WM-3	Open Throat Curb Inlet	CI	CI	Annually
Flexstorm	16 Olive at Main, 100 ft north of NW corner		CI	CI	7/15/2020		Inserts	CI	CI	Annually
Flexstorm	Palm and Main, 150 ft, North of NE corner		CI	CI	7/15/2020	WM-2	Open Throat Curb Inlet	CI	CI	Annually
Flexstorm	Palm and Main, 150 ft, North of NE corner		CI	CI	7/15/2020	WM-4	Open Throat Curb Inlet	CI	CI	Annually
Flexstorm	409 Harvard, Noth Curb, East Catch Basin		CI	CI	7/15/2020		Inserts	CI	CI	Annually
Flexstorm	Telegraph and Calavo, NE Corner		CI	CI	7/15/2020	WM-2	Curb Inlet	CI	CI	Annually

Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11
Certified FCS(s) Installed	FCS Location	Nearest Cross Street	FCS Owner	FCS Maintained By	FCS Installation Date	CB ID No. Served by FCS	CB Type	CB Owner	CB Maintained By	Frequency of FCS Maintenance and other O&M Comments
Column 1:	Indicate certified full capture system (FCS) installed in PLU, designated land uses, and equivalent alternate land use areas									
Column 2:	Name FCS street location and indicate whether: WS - west side; ES - east side; NS - north side; SS - south side									

Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11
Certified FCS(s) Installed	FCS Location	Nearest Cross Street	FCS Owner	FCS Maintained By	FCS Installation Date	CB ID No. Served by FCS	CB Type	CB Owner	CB Maintained By	Frequency of FCS Maintenance and other O&M Comments
Column 3:	Name the nearest cross street location of the FCS									
Column 4:	FCS Owned by: Co - County of L.A./ Ventura; Flood - L.A. County Flood Control District/ Ventura County Watershed Protection District; Ci - City; Ca - Caltrans; Pr - Private; Oth - Others									
Column 5:	FCS Maintained by: Co - County of L.A./ Ventura; Flood - L.A. County Flood Control District/ Ventura County Watershed Protection District; Ci - City; Ca - Caltrans; Pr - Private; Oth - Others									
Column 6:	Provide the date when FCS was installed									
Column 7:	Indicate County or City assigned catch basin (CB) identification (ID) numbers									
Column 8:	Type of CB based on Standard Plan for Public Works Construction from Greenbook Committee, Public Works Standards, Inc. (i.e., 300-2; 301-2; 302-2; 303-2; etc.)									
Column 9:	CB Owned by: Co - County of L.A./ Ventura; Flood - L.A. County Flood Control District/ Ventura County Watershed Protection District; Ci - City; Ca - Caltrans; Pr - Private; Oth - Others									
Column 10:	CB maintained by: Co - County of L.A./ Ventura; Flood - L.A. County Flood Control District/ Ventura County Watershed Protection District; Ci - City; Ca - Caltrans; Pr - Private; Oth - Others									
Column 11:	Indicate frequency of FCS maintenance (e.g. inspection & cleanout: 1x/3 mo., 1x/6 mo., 1x Nov., 1x Jan., etc.)									

2015 Statewide Trash Amendments

City of Santa Paula

Priority Land Uses

Josh Alessi and Camilla Guzman, Feb 2018

Proposed Locations

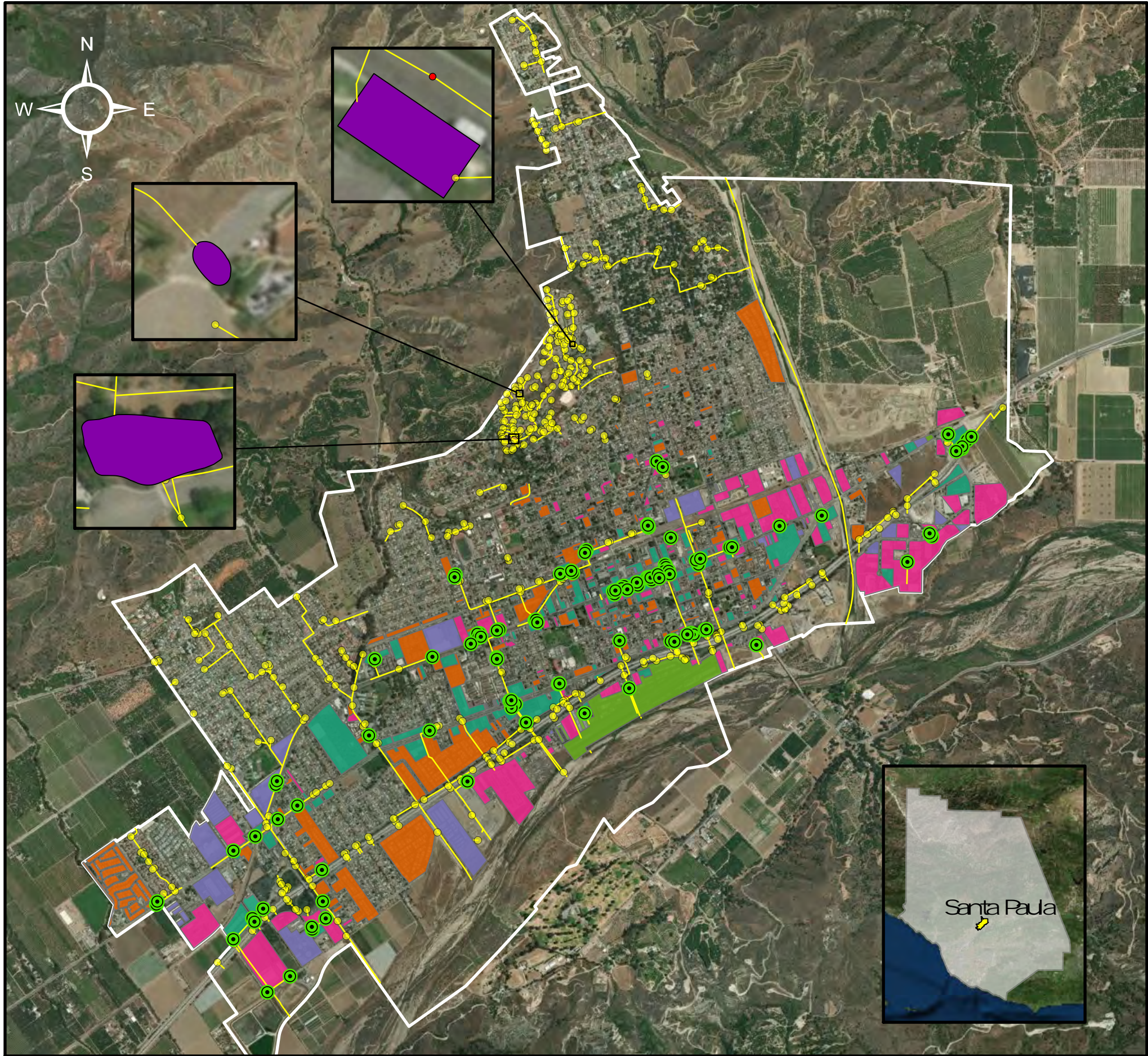
- Full Capture Devices

Storm Drain Network

- Inlets
- Storm Lines
- Best Management Practice
- Detention Basins

High Priority Land Use Areas

- Commercial
- High-Density residential
- Industrial
- Mixed Urban
- Public transportation stations



Sources: Esri, USGS, NGA, NASA, CGIAR, NR Robinson, NCEAS, NLS, OS, NMA, Geodatasystemen, Rijkswaterstaat, GSA, Gedland, FEMA, Intermap and the GIS user community. Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the Data Provided By: Ventura County Water Protection District
<http://www.ventura.org/gis-mapping/gis-data-coverage/mapping-base>
 Spatial Reference: NAD 1927 StatePlane California V FIPS 0405

2010 Permit MCM Forms

Annual Report Data Summary Sheet

Public Outreach 2022-2023

Contact Information

Permittee: Santa Paula

Name of Public Reporting Contact Person: (designated staff members are provided with relevant stormwater quality information, including program activities and preventative stormwater pollution control information)	Clete Saunier
Address of Public Reporting Contact Person:	P.O. Box 569, Santa Paula, CA 93061
Phone number of Public Reporting Contact Person:	805-933-4212
Number for Reporting Illicit Discharges and Connections (Hotline):	805-933-4212, 805-312-1423
Public reporting information has been listed in the government white pages of the local phone book:	Yes
If not, expected date of listing in phone book :	
Web Sites Listing Contact Information for Public Reporting:	https://spcity.org/205/Public-Works

Comments:

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Annual Report Data Summary Sheet

Public Outreach 2022-2023

Signage Programs

Permittee: Santa Paula

Total number of storm drain inlets in the Permittee's system: (should match number listed on page two of Public Agency Activities)	528
Total number of storm drain inlets and signs that are marked or posted with a no dumping message:	528

Total number of Designated Public Access Areas to creeks, channels & other relevant water bodies	0
Total Designated Public Access Areas to creeks, channels & other relevant water bodies posted with a sign which includes prohibitive language discouraging illegal dumping*:	0

Comments:

Annual Report Data Summary Sheet

Public Outreach 2022-2023

Outreach Efforts

Permittee: Santa Paula

Retail Partnership Outreach* Summary		
Type of Business	Number of type of Business	Number of Businesses Receiving Materials
Automotive parts stores	3	3
Home improvement centers/Lumber yards/Hardware stores	2	2
Pet shops /Feed stores	1	1
Total	6	6
*Permit requires by July 8, 2011		

Local Community Education and Outreach Program	
<i>(Excludes all countywide events including County Fair, Science Fair, Coastal Cleanup Day, Radio Script Contest and Times in Education Program)</i>	
Number of impressions made via print (newspaper ads/articles, utility bill inserts, mailings)	0
Number of impressions made via TV (cable stations, special shows using gross impressions or calculate by using 5% of the homes showing per week, then document how the figure was calculated)	0
Number of impressions made via radio	0
Number of impressions made via other media (non-staffed display, web page)	0
Total number of public communication effort impressions	0

Total number of community outreach contacts (group presentations, events)	
Total number of school educational outreach contacts	
Total number of miscellaneous contacts not included above	
Total number of contacts reached by meeting the public	
TOTAL ANNUAL CONTACTS & IMPRESSIONS	0

Definitions	
Impression	Public exposure to information on stormwater quality
Contacts	Interactive communication with the public i.e. meetings and other face to face situations.

Annual Report Data Summary Sheet

Public Outreach 2022-2023

Narrative

Permittee: Santa Paula

Outreach Efforts, Volunteer Programs and Community Events (Please provide additional information on your program's public outreach efforts as you would like it to appear in the annual report. If needed, a separate file or program may be used.)

City contributes to the Ventura Countywide Stormwater Program's Public Outreach Program: Media Outreach ongoing campaign (TV, billboard, radio, newspaper), coastal cleanup day, and more.

Business Assistance Program

Annual Report Data Summary Sheet

Land Development 2022-2023

Performance Standards

Permittee: Santa Paula

Does Permittee's CEQA process include the procedures necessary to consider potential stormwater quality impacts? (Due by July 8, 2011)	Yes
Does Permittee's General Plans include watershed and stormwater quality and quantity management considerations and policies?	Yes
Does Permittee conduct a detailed review of proposed BMPs, and does review included sizing calculations and pollutant removal performance?	Yes
Did Permittee establish authority among municipal departments with project review jurisdiction? (by July 8, 2011)	Yes
Did Permittee develop and implement a system for tracking projects that have been conditioned for post-construction treatment control BMPs? (Due by July 8, 2011)	Yes
Does Permittee conduct inspections of completed projects subject to the Planning and Land Development Program requirements to ensure proper installation of BMPs (effective 90 days after approval of Manual)	Yes
Does Permittee inspect post-construction BMPs operated by the Permittee at least once every 2 years? (Due July 8, 2012)	Yes
Did Permittee take enforcement action based on the results of the inspections?	Yes
Does Permittee require an Operation and Maintenance Plan for applicable stormwater BMPs prior to final Certificate of Occupancy?	Yes
Does Permittee require annual reports for private post-construction BMPs to demonstrate proper maintenance and operations? (Due by July 8, 2011)	Yes

Annual Report Data Summary Sheet

Land Development 2022-2023

General Plan

Permittee: Santa Paula

Date of General Plan	3/4/2020
-----------------------------	----------

General Plan Elements	General Plan includes Stormwater Requirements (Y/N)	Scheduled Date for Significant Rewrite of General Plan	Date Submitted to Regional Board
Land Use	Yes	3/3/2020	3/4/2020
Housing	Yes	10/1/2021	June 21, 2022
Conservation	Yes	3/4/2020	3/4/2002
Open space	Yes	3/4/2020	3/4/2020

Comments:

Draft Housing Element was submitted to HCD 9/16/2021. Adopted Housing Element resubmitted to HCD on 6/21/2022. HCD comments received by City 8/19/2022. Revisions in progress for resubmittal.

Annual Report Data Summary Sheet

Land Development
2022-2023

Projects and Applications

Permittee: Santa Paula

Projects and Applications Reviewed and Conditioned	
Total Number of Projects/Application Reviewed:	7
Non-SQUIMP, or non-Section E required projects conditioned for stormwater quality BMPs:	0
Total number of SQUIMP or Section E required projects reviewed:	7
Total number of SQUIMP or Section E required projects conditioned for stormwater quality BMPs:	7

Comments:

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Annual Report Data Summary Sheet

Land Development 2022-2023

BMP Maintenance

Permittee: Santa Paula

Permittee Operated BMPs*	
Total number of Permittee operated treatment control measures:	2
Number Permittee operated treatment control measures inspected:	2
Number of Permittee operated treatment control measures found operational at inspection, or returned to operational status:	2
Were all Permittee treatment control measures inspected once every two years:	Yes

* Inspections required once every two years

the BMP performance) was: <ul style="list-style-type: none">• Hauled away and legally disposed of; or• Applied to the land without runoff; or• Discharged to the sanitary sewer system (with permits or authorization); or• Treated or filtered to remove bacteria, sediments, nutrients, and meet all limitations?	Yes
--	-----

Privately Maintained BMPs	
Number of privately maintained BMPs	5
Number of annual reports requested:	0
Number of annual reports received:	0
Number of enforcement actions:	0

Comments:
<p>Permitted Operated BMP's include the Mesa Tank Project and Harvard BLVD Water & Sewer Pipeline Replacement Project</p>

Annual Report Data Summary Sheet

Land Development
2022-2023

Training

Permittee: Santa Paula

Training	
Number of Staff Targeted	1
Number Staff Trained	1

Comments:

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Annual Report Data Summary Sheet

Construction Inspections 2022-2023

Permit Tracking

Permittee: Santa Paula

Did the Permittee maintain an electronic system to track grading permits, encroachment permits, and any other municipal authorization to move soil?

Yes

Permit Category	Total Number of Permits Granted in Reporting Period
Grading Permits	2
Encroachment Permits	241
Demolition Permits	45
Building Permits	320
Local Construction Permits	
Other	
Total	608

Comments:

Annual Report Data Summary Sheet

Construction Inspections 2022-2023

Stormwater Pollution Prevention Plans

Permittee: Santa Paula

SWPPP Tracking	
Total number of projects required to submit Local SWPPP:	0
Total number of projects that submitted a Local SWPPP:	0
Total Number of projects required to submit State SWPPP:	4
Total Number of projects that submitted a State SWPPP:	4
Total number of these projects that filed a NOI:	4
Does the Permittee require proof of Change of Information form (COI) and a copy of the modified SWPPP(s) at any time a transfer of ownership takes place?	Yes

Comments:

Annual Report Data Summary Sheet

Construction Inspections 2022-2023

Inspections

Page 1 of 2

Permittee: Santa Paula

Minimum BMPS	
Was each construction site less than 1 acre inspected to ensure that the minimum set of BMPs (Table 6) were implemented?	Yes
Was each construction site greater than 1 acre and less than 5 acres inspected to ensure that the minimum set of BMPs (Tables 6 & 7) were implemented?	Yes
Was each construction site greater than 5 acres inspected to ensure that the minimum set of BMPs (Tables 6, 7 & 8) were implemented?	Yes
Was each project that includes roadbed or street paving, (non-maintenance) inspected to ensure that the minimum set of BMPs were implemented?	Yes

High Risk Sites	
Did the Permittee ensure implementation of enhanced practices such as increased BMP inspection and maintenance requirements at "high risk" sites?	Yes
Did the Permittee require that high risk sites be inspected by the project proponent's Qualified SWPPP Developer or Qualified SWPPP Practitioner or personnel or consultants who are Certified Professionals in Erosion and Sediment Control (CPESC) at the time of BMP installation, at least weekly during the wet season, and at least once each 24 hour period during a storm event that generates runoff from the site?	Yes
Did the Permittee require that the project proponent retain records of the inspection and a determination and rationale of the BMPs selected to control runoff during the wet season?	Yes

Annual Report Data Summary Sheet

Construction Inspections

2022-23

Inspections

Page 2 of 2

Inspections*	
Total number of projects <u>greater than one acre</u> that were inspected for stormwater requirements with a checklist at least once during the wet season:	2
Total number of projects inspected for stormwater requirements with a checklist:	2
Total number of follow-up inspections performed within two weeks to ensure compliance:	2
Number of projects inspected for post-construction stormwater controls prior to issuance of Certificate of Occupancy:	0

* Inspections are of projects in process during reporting period. Conditions and permits may have been approved in prior years

Comments:
<p>Post construction stormwater controls not inspected as all projects are currently under construction.</p>

Annual Report Data Summary Sheet

Construction Inspections 2022-2023

Enforcement

Permittee: Santa Paula

Enforcement Actions	
Total number of Job Memorandums issued:	0
Total number of NOVs issued:	0
Total number of Admin Compliance Orders issued:	0
Total number of Cease/Desist Work Orders issued:	0
Total number of projects of Referred to Regional Board:	0
Total number of complaints transmitted by Regional Board:	0

Regional Board

Referrals to Board	
Total number violators of the municipal storm water ordinance and CWC 513260 referred to the Regional Water Board, after taking necessary measures:	0
Total number non-filers under the CASGP, referred to the Regional Water Board, no later than 15 days after making a determination of failure to file:	0

Referrals from Regional Board	
Total number of complaints transmitted by Regional Board	0
Was an initial investigation initiated within one business day on complaint(s) transmitted by the Regional Water Board Staff on the construction site(s) within its jurisdiction?	N/A

Comments:

Annual Report Data Summary Sheet

Construction Inspections 2022-2023

Post Construction BMPs

Permittee: Santa Paula

Were the constructed site design, source control and treatment control BMPs inspected to verify that they have been constructed in compliance with all specifications, plans, permits, ordinances, and the MS4 permit prior to approving and/or signing off for final occupancy and issuing the Certificate of Occupancy for all construction projects subject to post-construction controls?	Yes
---	-----

Number of projects inspected for post-construction stormwater controls prior to issuance of Certificate of Occupancy:	2
---	---

One project with multiple buildings or units may have multiple Certificates of Occupancy

Comments:

Annual Report Data Summary Sheet

Construction Inspections 2022-2023

Training

Permittee: Santa Paula

Training	
Number of Staff Targeted	6
Number Staff Trained	6

For the Period of March 12, 2023 - June 30, 2023 was training conducted for all staff whose primary job duties are related to implementing the construction stormwater program in Part VIII.G of the 2021 Regional Permit.

Yes

Comments:

Annual Report Data Summary Sheet

Public Agency Activities 2022-2023

Capital Improvement Projects

Page 1 of 2

Permittee: Santa Paula

Summary of Capital Improvement Projects	
Number of construction projects*, excluding maintenance and emergency repair, disturbing < 1 acre:	2
Number of projects required to have SWPCP:	2
Number of projects subject to State GCP:	1
Number of Projects required to have SWPPP/NOI:	1

*Excludes projects with minimal land disturbance (e.g. street signs, traffic signals, etc)

Enforcement Actions	
Total number of Job Memorandums issued:	0
Total number of NOVs issued:	0
Total number of Admin Compliance Orders issued:	0
Total number of Cease/Desist Work Orders issued:	0
Total number of Projects Referred to Regional Board:	0
Total number of complaints transmitted by Regional Board:	0

Continued on next page

Annual Report Data Summary Sheet

Public Agency Activities 2022-2023

Capital Improvement Projects

Page 2 of 2

Permittee: Santa Paula

Public Construction Activities Management	
Did the Permittee comply with all the Development Planning Program requirements for public construction projects?	Yes
Did the Permittee comply with all the Development Construction Program requirements at Permittee owned or operated construction sites?	Yes
Did the Permittee require the development of a Storm Water Pollution Control Plan for public projects* including those under a Capital Improvement Project Plan that disturb less than one acre of soil?	Yes

*Excludes projects with minimal land disturbance (e.g. street signs, traffic signals, etc)

Comments:

Annual Report Data Summary Sheet

Public Agency Activities 2022-2023

Facilities

Permittee: Santa Paula

Did the Permittee require Permittee-owned and/or leased facilities, including but not limited to vehicle/equipment maintenance facilities, material storage facilities, and corporation yards, to ensure implementation of appropriate BMPs identified in Table 10 of the Permit?	Yes
---	-----

Summary of Permittee-Owned and Leased Vehicle Maintenance, Material Storage and Corporation Yards	
Facility Name	Location
City Corporation Yard	903 Corporation Street, Santa Paula
City Water Yard	132 S. Palm Street, Santa Paula

Vehicle And Equipment Wash Areas	
Did the Permittee address discharges of wash waters from vehicles and equipment washing facilities by implementing one of the following (Due by July 8, 2011) <ul style="list-style-type: none">• Self-contain, and haul-off for disposal;• Equip with a clarifier;• Equip with an alternative pre-treatment device; or• Plumb to the sanitary sewer?	Yes

Comments:

Annual Report Data Summary Sheet

Public Agency Activities 2022-2023

Integrated Pest Management

Permittee: **Santa Paula**

Integrated Pest Management	
Did the Permittee implement an integrated pest management (IPM) program consistent with Permit? (Due by July 8, 2011)	Yes
Did the Permittee prepare and annual update an inventory of pesticides used by all internal departments, divisions, hired contractors and other operational units? (Due by September 8, 2012)	Yes
Did the Permittee establish standard protocols for routine and non-routine application of pesticide consistent with the permit requirements? (Due October 8, 2010)	Yes

Comments:

Annual Report Data Summary Sheet

Public Agency Activities 2022-2023

Catch Basin O&M

Permittee: **Santa Paula**

Coordination with Regional Board	
Did the Permittee prepare a map or list of catch basins, with GPS coordinates, designations, and rationale for designations? (Due by October 8, 2010)	Yes

Summary of Catch Basin Prioritization	Priority A Catch Basins	Priority B Catch Basins	Priority C Catch Basins	Total	Total Tons Debris Removed
Number of Catch Basins	0	35	493	528	4
Number of Catch Basins Inspections*	0	35	493	528	
Number of Catch Basins Cleaned* (that contained more than 25% of trash)	0	7	22	29	

* A catch basin may be inspected or cleaned more than once during a the permit year.

Did the Permittee inspect the legibility of the catch basin label by all inlets before the beginning of the wet season?	Yes
Were catch basins with illegible stencils recorded and re-stenciled or relabeled within 15 days of inspection?	Yes

Comments:

Annual Report Data Summary Sheet

Public Agency Activities 2022-2023

Storm Drain Maintenance

Permittee: Santa Paula

<p>Did the Permittee develop and implement a Storm Drain Maintenance Program that includes (Due by October 6, 2010):</p> <ul style="list-style-type: none"> • Visual monitoring of Permittee-owned open channels and other drainage structures for debris <ul style="list-style-type: none"> at least annually; • Removal of trash and debris from open channel storm drains a minimum of once per year before the wet season; • Elimination of the discharge of contaminants during MS4 maintenance and clean outs; and 	Yes
---	-----

Summary of Maintenance	Amount of facility type in system	Miles of facilities inspected/cleaned at least once prior to the wet season (number may be greater than total in system)	Total tons of debris removed (estimate)
Channels / Other Drainage Structures (report in miles)	1	20	1
Detention/Retention Basins			

Comments:

Annual Report Data Summary Sheet

Public Agency Activities 2022-2023

Trash Management

Permittee: Santa Paula

Do the Permittee have trash receptacles, or equivalent trash capturing devices in areas subject to high trash generation within its jurisdiction? (Due by July 8, 2011)	Yes
Were trash receptacles cleaned out and maintained as necessary to prevent trash overflow?	Yes
Did the Permittee provide additional trash management practices in areas defined as Priority A? (Due by July 8, 2012)	Yes
How many trash excluders have been installed to date?	7
Did the Permittee implement alternative or enhanced BMPs instead of trash excluders?	
Did Permittee require appropriate measures for any event in the public right of way or wherever it is foreseeable that substantial quantities of trash and litter may be generated? <ul style="list-style-type: none">• Proper management of trash and litter generated• Arrangement for temporary screens to be placed on catch basins• Arrangement that trash is removed after the event	

Briefly describe what your agency has done to identify high trash areas and manage trash and litter from those areas.

City previously identified high trash areas: high pedestrian traffic areas, restaurant concentration areas, special events. City continues with increased trash receptacles in public areas prone to high amounts of trash. City continued increase in trash pickup from biweekly to weekly in public areas prone to high amounts of trash. City empties trash receptacles before and after local event/parades and conduct street sweeping after these events.

Briefly describe what additional trash management your agency has done within Priority A areas (if any). Need to demonstrate equivalent trash removal if trash excluders were not installed.

Briefly describe what your agency has done to manage trash and litter from public events:

City increased the number of trash receptables in public areas prone to high amount of trash. City continued increase in trash pickup from biweekly to weekly in public areas prone to high amounts of trash.

Annual Report Data Summary Sheet

Public Agency Activities

2022-2023

Spills and Emergency Response

Permittee: Santa Paula

Were there any emergencies that caused the Permittee to invoke Emergency Procedures Self-Waiver?	No
Were self-waivers reported to the Regional Board?	No

Summary of Emergency Procedures	
Date Emergency Procedures invoked	Description

Comments:

Annual Report Data Summary Sheet

Public Agency Activities 2022-2023

Streets and Roads

Permittee: Santa Paula

Sweeping and Maintenance	
Did the Permittee perform street sweeping of curbed streets in commercial areas and areas subject to high trash generation at least two times a month?	Yes
Did the Permittee require that appropriate BMPs (specified on page 79 of the Permit) be implemented for any project that includes roadbed or street paving, repaving, patching, digouts, or resurfacing road surfaces?	Yes

Summary of Street Sweeping Activities	
Total curb miles in the system:	112
Total curb miles swept*:	2,482
Total amount of debris removed by street sweeping (tons):	247

* Total miles swept include sections swept more than once and reflects Permit requirement of sweeping commercial and high trash areas at least twice per month as well as other areas.

Comments:

Annual Report Data Summary Sheet

Public Agency Activities 2022-2023

Training

Permittee: Santa Paula

Training	
Number of Staff Targeted	9
Number Staff Trained	9

Did the Permittee provide training for key staff whose interactions, jobs, and activities affect stormwater quality? (Due June 30, annually)	Yes
Did the Permittee provide training for contractors, or ensure that contractors were trained, whose interactions, jobs, and activities affect stormwater quality? (Due June 30, annually)	Yes
Did the Permittee conduct training for key staff that use or have the potential to use pesticides or fertilizers? (Due June 30, annually)	Yes
Did the Permittee provide training for contractors who use or have the potential to use pesticides or fertilizers, or ensure that contractors were trained? (Due June 30, annually)	Yes

Comments:

Annual Report Data Summary Sheet

Industrial and Commercial Business Inspections

2022-2023

Performance Standards

Permittee: Santa Paula

Site Inspection and Enforcement	
Did the Permittee maintain and update the Industrial and Commercial Facility Inventory?	Yes
Was the industrial inspection checklist reviewed/revised to be consistent with the permit?	Yes
Was the commercial business-specific checklist reviewed/revised to be consistent with the permit?	Yes
Have initial inspections of commercial and industrial facilities been completed? (inspections to be completed by July 8, 2012)	Yes
Were follow-up inspections conducted as necessary?	Yes
Did inspectors ensure information on BMPs was available on site?	Yes
Has a progressive enforcement policy been implemented?	Yes
Have key staff involved in the Business Inspection program received training?	Yes
For the Period of March 12, 2023 - June 30, 2023, was an investigation initiated within one business day of receipt of complaint from facilities within your jurisdiction?	N/A
For the Period of March 12, 2023 - June 30, 2023, for all investigations to complaints from facilities, were findings of the investigation reported to the Los Angeles Regional Board within 3 weeks of receiving the complaint?	N/A

Comments:

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Annual Report Data Summary Sheet

Industrial and Commercial Business Inspections 2022-2023

Inventory & Inspections

Permittee: Santa Paula																			
Number of Facilities:	Inventory									Inspection Results for Reporting Year									
	Watersheds						Filed and Current NOI Facilities	Filed and Current NEC facilities	Identified as Non-Filers under the IAGSP (no WDID number) (a)	Inspection/Education			Progressive Enforcement* (not in compliance with stormwater controls)				IASGP Compliance		
	Malibu Creek	Calleguas Creek	Santa Clara River	Cuyama River	Ventura River	Misc. Coastal				NOI Facilities		NEC Facilities	NOI and NEC Facilities				NOI Facilities	NEC Facilities	Non-filers
							Inspected	With Information on BMPs Available On-site?	Inspected (Minimum 20% Required)	Requiring Follow-up inspection	Requiring Second Follow-up inspection	Referred to Regional Board	In Compliance Following Progressive Enforcement	With SWPPPs On-Site	Verified as having no exposure ** (b)	Verified that filed as NOI and/ or NEC (c)			
Industrial Facilities			5				5												
Federally Mandated Facilities			0				0												
Automotive Dealers/Gas Stations			11				11												
Automotive Service Facilities			9				9												
Nurseries			3				3												
Restaurants			71				71												
Total	0	0	99	0	0	0	99	0	0	0	0	0	0	0	0	0	0	0	0

* Follow-up inspection is required within four weeks

** At minimum 20% of facilities identified as Non-Exposure require inspection annually

a) number of facilities "Identified as Non-filers" = facilities in the listed categories that are required to file for the permit but have not (excludes all non-exposure facilities)

b) number of NEC facilities inspected & verified as having no exposure

c) number of facilities that were identified as non-filers and inspected &/or verified that they filed either NOI or NEC

Comments:

Annual Report Data Summary Sheet

Industrial and Commercial Business Inspections 2022-2023

Training

Permittee: Santa Paula

Training	
Number of Staff Targeted	6
Number Staff Trained	6

For the Period of March 12, 2023 - June 30, 2023, was training conducted for all staff whose primary job duties are related to implementing the industrial and commercial facilities program in Part VIII.E of the 2021 Regional Permit?	Yes
--	-----

Comments:

Annual Report Data Summary Sheet

Illicit Discharge and Illicit Connections 2022-2023

Illicit Discharges

Page 1 of 3

Permittee: **Santa Paula**

Illicit Discharge Complaints Received	
Number of illicit discharges reported:	1
Number of reports responded to:	1
Number of reports that were actual illicit discharges:	1
Number of illicit discharges that were resolved:	1

Enforcement Actions Taken to Eliminate Illicit Discharges	
Total number of warnings:	0
Total number of NOVs:	0
Total number of legal actions/fines:	0
Total number enforcement actions for illicit discharges:	0

Type of Illicit Discharges								
Hazardous Material	Sewage	Wastewater	Building Materials	Landscape Debris	Animal wastes	Litter/Trash	Other	Total*
1								1
Type definitions								
Hazardous Material	By-products of society that can pose a substantial or potential hazard to human health or environment when improperly managed. Posses at least one of the four following characteristics (ignitability, corrosivity, reactivity, or toxicity), or identified as a listed waste (e.g. oil, used anti-freeze, hydraulic fluid).							
Sewage	The waste and wastewater produced by residential and commercial sources and discharged into sewers, includes the sludge produced by Publicly Owned Treatment Works.							
Wastewater	The spent or used water from a home, community, farm or industry that contains dissolved or suspended matter.							
Building Materials	Any debris associated with construction activities used to construct a building and/or stand/alone facility, such as plaster, dry-wall, nails, wood, etc.							
Landscape Debris	Excessive eroded soils, sediment and/or organic materials							
Animal wastes	Discharge from confinement facilities, kennels, pens, recreational facilities, stables, show facilities, and residential yards.							
Litter/Trash	Synthetic consumer by-products							
Other	Any remaining materials that do not fit into the above mentioned categories.							

Annual Report Data Summary Sheet

Illicit Discharge and Illicit Connections 2022-2023

Illicit Discharges

Page 2 of 3

Permittee: **Santa Paula**

Probable Causes of Illicit Discharges					
Accident	Cleaning Activities	Spill/ Overflow	Unknown Cause	Other	Total*
1					1
Probable Cause Definitions					
Accident	An unpreventable or chance happening that occurs unexpectedly, without deliberate plan or cause.				
Cleaning Activities	Any activity intended to wash, tidy up, or make clean.				
Spill/ Overflow	A preventable release of material; may be the result of poor maintenance or negligence.				
Unknown	Cause is unidentified; unable to determine origin.				
Other	Any remaining incidents that do not fit into the above mentioned categories.				

Sources of Illicit Discharges					
Residential	Industrial/ Commercial	Permittee Facility	Construction Activities	Unknown Source	Total*
	1				1
Source Definitions					
Residential	Discharge generated from residential activities; can include solid waste (trash, discarded appliances), automotive maintenance/cleaning by-products (oil, transmission fluid), home repair/remodel waste (paint, plaster) and yard trimmings.				
Industrial/ Commercial	Discharge of all solid and unwanted materials emanating from a business or industrial facility/operation; may be liquid, sludge, solid or hazardous.				
Co-permittee Facility	Discharge of effluent or waste from a Co-permittee owned facility (includes corporate yards, and waste water treatment plants); may be composed of domestic wastewaters and/or industrial				
Construction Activities	Discharge of building materials, dredging materials (including sediment), tree stumps, and rubble from construction and demolition of homes, commercial buildings and other structures and pavements. May contain lead, asbestos, or other hazardous material.				
Unknown	Any discharge from city streets and adjacent domestic or commercial properties that could carry pollutants of various kinds into the storm drains and receiving waters that cannot be traced to source or does not fit into the above mentioned categories.				

*The total of each table should equal the total actual illicit discharges.

	Cause	Type	Source	Actual Illicit Discharges
Total	1	1	1	1

continued

Annual Report Data Summary Sheet

Illicit Discharge and Illicit Connections 2022-2023

Illicit Discharges

Page 3 of 3

Permittee: Santa Paula

Comments: (Please provide any additional information on how illicit discharges were detected, inspected and eliminated.)

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Annual Report Data Summary Sheet

Illicit Discharge and Illicit Connections 2022-2023

Performance Measures

Permittee: **Santa Paula**

Public Notifications	
Did the Permittee document the procedures of the ID/IC Program and make them available for public review?	Yes
Did the Permittee maintain a phone hotline to receive reports of ID/IC?	Yes
Did the Permittee maintain a web site to receive/direct reports of ID/IC?	Yes

Legal Authority	
Does the Permittee have legal authority to prevent and remove illicit connections and illicit discharges?	Yes

Response	
Did the Permittee respond within one business day or discovery or report of a suspected illicit discharge and abate, contain, and/or cleanup the discharge?	Yes
Did the Permittee investigate illicit discharges during or immediately following containment and cleanup activities?	Yes
Did the Permittee take appropriate enforcement action to eliminate the illicit discharge?	Yes
Did the Permittee keep records of all illicit discharge discoveries, reports, responses, and formal enforcement?	Yes

Comments:

Annual Report Data Summary Sheet

Illicit Discharge and Illicit Connections 2022-2023

Tracking Location of ID/IC

Permittee: Santa Paula

Mapping	
Did the Permittee submit a map of all channeled portions of the storm drain system in a uniform format? (Due by October 8, 2010)	Yes
Did the Permittee submit to the Principal permitted a map of all portions of the storm drain system consisting of pipes 36 inches in diameter or greater in a uniform format? (Due by May 7, 2012)	Yes
Did the Permittee submit map of all portions of the storm drain system consisting of pipes 18 inches in diameter or greater in a uniform format? (Due by May 7, 2014)	Yes

Field Screening	
Did the Permittee screen all portions of the storm drain system consisting of pipes 36 inches in diameter or greater? (Due by May 7, 2012)	Yes
Did the Permittee screen all high priority areas identified during the mapping of illicit connections and discharges? (Due by May 7, 2012)	Yes
Did the Permittee screen all portions of the storm drain system 50 years of age or older? (Due by May 7, 2012)	Yes

Comments:

Annual Report Data Summary Sheet

Illicit Discharge and Illicit Connections 2022-2023

Illicit Connections

Permittee: Santa Paula

Illicit Connections	
Did the Permittee maintain a list of all connections under investigation for possible illicit connection and their status?	Yes
Did the Permittee complete investigation of reports of illicit connections to determine the source, nature, and volume of the discharge as well as the responsible party within 21 days?	Yes
Did the Permittee keep records of all illicit connection investigations and formal actions taken to eliminate all illicit connections?	Yes

Illicit Connections Complaints Received	
Number of illicit connection incidents reported:	0
Number of reports responded to:	0
Number of reports that were actual illicit connections:	0
Number of illicit connections that were eliminated:	0

Enforcement Actions Taken to Eliminate Illicit Connections	
Total number of warnings:	0
Total number of NOVs:	0
Total number of legal actions/fines:	0
Total number enforcement actions for illicit connections:	0

Termination	
Upon confirmation of an illicit connection, did the Permittee terminate the connection using formal enforcement within 180 days of completion of the investigation?	

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Annual Report Data Summary Sheet

Illicit Discharge and Illicit Connections

2022-2023

Training

Permittee: Santa Paula

Training	
Number of Staff Targeted	7
Number Staff Trained	7

Did the Permittee conduct training for their employees and ensure contractors are trained who are responsible for IC/ID (IDDE)?	Yes
---	-----

Comments:



Monica D. Castillo
Associate
(909) 483-6657
monica.castillo@bbklaw.com

August 21, 2023

Susana Arredondo, Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013-
Attn: Ivar Ridgeway, Stormwater Permitting Supervisor

Re: Certification of Legal Authority of the City of Santa Paula to Implement and Enforce the Requirements of 40 C.F.R. § 122.26(d)(2)(i)(A-F) and Order No. R4-2021-0105 NPDES Permit CAS004004

Dear Ms. Arredondo:

The City of Santa Paula ("City"), by and through its City Attorney, hereby submits the following certification ("Statement"), pursuant to Section VI.B.1-B.2., of the MS4 Permit for Los Angeles County, Order No. R4-2021-0105 (NPDES Permit No. CAS004004), issued by the California Regional Water Quality Control Board, Los Angeles Region ("RWQCB"), entitled "Waste Discharge Requirements and National Permit Discharge Elimination System (NPDES) Permit for Municipal Separate Storm Sewer System ("MS4") Discharges within the Coastal Watersheds of Los Angeles and Ventura Counties" ("Permit").

The City is one of the co-permittees under the Permit. Section VI.B.1-B.2., of the Permit requires:

Each Permittee must submit a statement certified by its chief legal counsel that the Permittee has the legal authority within its jurisdiction to implement and enforce each of the requirements contained in 40 CFR § 122.26(d)(2)(i)(A-F) and this Order. Each Permittee shall submit this certification annually as part of its Annual Report beginning with the first Annual Report required under this Order. These statements must include:

- i. Citation of applicable municipal ordinances or other appropriate legal authorities and their relationship to the requirements of 40 CFR § 122.26(d)(2)(i)(A)-(F) and of this Order; and*
- ii. Identification of the local administrative and legal procedures available to mandate compliance with applicable municipal ordinances identified in subsection (i) above and therefore with the conditions of this Order, and a statement as to whether enforcement actions can be completed administratively or whether they must be commenced and completed in the judicial system.*

Additionally, the City is also a participant in the Ventura Countywide Stormwater Quality Management Program. Permittees that are participants in a Watershed Management Program are subject to additional requirements. Specifically, Permit Section IX.B.7(a) requires:

7. Each program shall include the following components:

a. Documentation that Permittees have the necessary legal authority to independently or collaboratively implement the Watershed Control Measures identified in the program, or that other legal authority exists to compel implementation of the Watershed Control Measures.

The purpose of this Statement is to describe the City's compliance with Section VI.B.1-B.2. and Section IX.B.7(a) of the Permit. As discussed in further detail herein, it is my opinion that the City has the necessary legal authority to implement the Permit and to control and prohibit discharges of pollutants into the Municipal Separate Storm Sewer System ("MS4"). However, this Statement is not, nor should it be construed as, a waiver of any rights that the City may have relating to the Permit.

1. Legal Authority Statement

We have reviewed the City's applicable ordinances in conjunction with this statement. In our opinion, the City has the necessary legal authority to comply with the legal requirements imposed upon it under the Permit, consistent with the requirements set forth in the U.S. Environmental Protection Agency's regulations promulgated under the Clean Water Act, and, specifically, 40 C.F.R. § 122.26(d)(2)(i)(A-F), and to the extent permitted by state and federal law and subject to the limitations on municipal action under the California and United States Constitutions, except as noted herein.

The City, as a general law city, has broad general police powers under the California Constitution to enact legislation for health and public welfare of the community to the extent not preempted by federal or state law. In addition, the City adopted ordinances for the purpose of ensuring that it has adequate legal authority to implement and enforce its storm water control program. The City has the authority under the California Constitution and state law to enact and enforce these ordinances, and these ordinances were duly enacted.

2. Ordinances

The City has adopted ordinances related to the regulation of urban runoff to control and prohibit discharges of pollutants into the MS4 and to comply with the requirements of the Permit applicable to it including Section IX.B.5., as well as, to the extent applicable, 40 C.F.R. § 122.26 (d)(2)(i)(A)-(F). The City's Storm Water Management and Discharge Control Ordinance (Chapter 54 of Title 5 of the Santa Paula Municipal Code ("SPMC")) is the principal City ordinance addressing the control of urban runoff. Under this ordinance, the City has the necessary legal authority to do the following:

- i. 40 C.F.R. § 122.26(d)(2)(i)(A); Permit Section VI.B.1.a.: Control the contribution of pollutants to its MS4 from storm water discharges associated with industrial and construction activity and control the quality of storm water discharged from industrial and construction sites. This requirement applies both to industrial and construction sites with coverage under an NPDES permit, as well as to those sites that do not have coverage under an NPDES permit (SPMC § 54.11 – Pollution prohibited; SPMC § 54.31 – Construction activities; SPMC; § 54.32 – Development; SPMC § 54.33 – Best management practices adopted);
- ii. 40 C.F.R. § 122.26(d)(2)(i)(C); Permit Section VI.B.1.b.: Prohibit all non-storm water discharges through the MS4 to receiving waters not otherwise authorized or conditionally exempt pursuant to Part III.A (SPMC § 54.10 – Illicit discharges prohibited, exempt discharges; SPMC § 54.11 – Pollution prohibited; SPMC § 54.12 – Illicit connections);
- iii. 40 C.F.R. § 122.26(d)(2)(i)(B); Permit Section VI.B.1.c.: Prohibit and eliminate illicit discharges and illicit connections to the MS4 (SPMC § 54.10 – Illicit discharges prohibited, exempt discharges; SPMC § 54.12 – Illicit connections; SPMC § 54.50 – Scope of inspections);
- iv. 40 C.F.R. § 122.26(d)(2)(i)(C); Permit Section VI.B.1.d.: Control the discharge of spills, dumping, or disposal of materials other than storm water to its MS4 (SPMC § 54.10 – Illicit discharges prohibited, exempt discharges; SPMC § 54.11 – Pollution prohibited; SPMC § 54.12 – Illicit connections; § 54.31 – Construction activities; SPMC § 54.32 – Development; § 54.35 – Illicit Discharge and Connections; SPMC § 54.50 – Scope of inspections; SPMC § 54.51 – Administrative citations and remedies; SPMC § 54.55 – Civil remedies, injunctions; SPMC § 54.56 – Other civil remedies; SPMC § 54.57 – Discharge Permit; § 54.58 – Permit denial, suspension, revocation or modification; SPMC § 54.59 – Permit Enforcement and compliance);
- v. 40 C.F.R. § 122.26(d)(2)(i)(E); Permit Section VI.B.1.e.: Require compliance with conditions in Permittee ordinances, permits, contracts or orders (i.e., hold dischargers to its MS4 accountable for their contributions of pollutants and flows) (SPMC § 54.10 – Illicit discharges prohibited, exempt discharges; SPMC § 54.11 – Pollution prohibited; SPMC § 54.12 – Illicit connections; § 54.31 – Construction activities; SPMC § 54.32 – Development; SPMC § 54.33 – Best management practices adopted; SPMC § 54.34 – Notification and intent of compliance with general permits; SPMC § 54.35 – Illicit Discharge and Connections; SPMC § 54.50 – Scope of inspections; SPMC § 54.51 – Administrative citations and remedies; SPMC § 54.55 – Civil remedies, injunctions; SPMC § 54.56 – Other civil remedies; SPMC § 54.57 – Discharge Permit);
- vi. 40 C.F.R. § 122.26(d)(2)(i)(E)-(F); Permit Section VI.B.1.f.: Utilize enforcement mechanisms to require compliance with applicable ordinances, permits, contracts,

or orders (SPMC § 54.34 – Notification and intent of compliance with general permits; SPMC § 54.35 – Illicit Discharge and Connections; SPMC § 54.50 – Scope of inspections; SPMC § 54.51 – Administrative citations and remedies; SPMC § 54.55 – Civil remedies, injunctions; SPMC § 54.56 – Other civil remedies; SPMC § 54.58 – Permit denial, suspension, revocation or modification; SPMC § 54.59 – Permit Enforcement and compliance);

- vii. 40 C.F.R. § 122.26(d)(2)(i)(D); Permit Section VI.B.1.g.: Control the contribution of pollutants from one portion of the shared MS4 to another portion of the MS4 through interagency agreements among co-permittees (SPMC § 54.10 – Illicit discharges prohibited, exempt discharges; SPMC § 54.11 – Pollution prohibited; SPMC § 54.34 – Notification and intent of compliance with general permits; SPMC § 54.57 – Discharge Permit; § 54.58 – Permit denial, suspension, revocation or modification; SPMC § 54.59 – Permit Enforcement and compliance; Government Code § 6502 — Authority for Agreement; Out-of-State Agencies; Government Code § 23004 — Powers, Enumeration);
- viii. 40 C.F.R. § 122.26 (d)(2)(i)(D); Permit Section VI.B.1.h.: Control of the contribution of pollutants from one portion of the shared MS4 to another portion of the MS4 through interagency agreements with other owners of the MS4 such as the State of California Department of Transportation (SPMC § 54.10 – Illicit discharges prohibited, exempt discharges; SPMC § 54.11 – Pollution prohibited; SPMC § 54.34 – Notification and intent of compliance with general permits; SPMC § 54.57 – Discharge Permit; § 54.58 – Permit denial, suspension, revocation or modification; SPMC § 54.59 – Permit Enforcement and compliance; Government Code § 6502 — Authority for Agreement; Out-of-State Agencies; Government Code § 23004 — Powers, Enumeration);
- ix. 40 C.F.R. § 122.26(d)(2)(i)(F); Permit Section VI.B.1.i.: Carry out all inspections, surveillance, and monitoring procedures necessary to determine compliance and noncompliance with applicable municipal ordinances, permits, contracts and orders, and with the provisions of this Order, including the prohibition of non-storm water discharges into the MS4 and receiving waters. This means the Permittee must have authority to enter, monitor, inspect, take measurements, review and copy records, and require regular reports from entities discharging into its MS4 (SPMC § 54.50 – Scope of inspections);
- x. 40 C.F.R. § 122.26(d)(2)(i)(E); Permit Section VI.B.1.j.: Require the use of control measures to prevent or reduce the discharge of pollutants to achieve water quality standards/receiving water limitations (SPMC § 54.10 – Illicit discharges prohibited, exempt discharges; SPMC § 54.11 – Pollution prohibited; SPMC § 54.12 – Illicit connections; SPMC §54.30 – Best management practices required; SPMC §54.33 – Best management practices adopted; SPMC § 54.50 – Scope of inspections; SPMC § 54.51 – Administrative citations and remedies; SPMC § 54.55 – Civil remedies, injunctions; SPMC § 54.56 – Other civil remedies;);

- xi. 40 C.F.R. § 122.26(d)(2)(i)(E); Permit Section VI.B.1.k.: Require that structural Best Management Practices (BMPs) are properly operated and maintained (SPMC §54.30 – Best management practices required; SPMC §54.33 – Best management practices adopted; SPMC § 54.50 – Scope of inspections; SPMC § 54.51 – Administrative citations and remedies; SPMC § 54.55 – Civil remedies, injunctions; SPMC § 54.56 – Other civil remedies; SPMC § 54.58 – Permit denial, suspension, revocation or modification; SPMC § 54.59 – Permit Enforcement and compliance); and
- xii. 40 C.F.R. § 122.26(d)(2)(i)(E); Permit Section VI.B.1.l.: Require documentation on the operation and maintenance of structural BMPs and their effectiveness in reducing the discharge of pollutants to the MS4 (SPMC §54.30 – Best management practices required; SPMC §54.32 – Development; SPMC §54.33 – Best management practices adopted; SPMC § 54.50 – Scope of inspections; SPMC § 54.51 – Administrative citations and remedies).

3. Implementation

Some of the City's ordinances are implemented through permit programs and others are implemented as regulatory programs. Under each ordinance, one or more City bodies, departments or department directors are authorized and directed in each ordinance to take the actions contemplated by the ordinance (*e.g.*, to consider evidence and make findings, to issue or deny permits, to impose conditions on projects, to inspect, to take enforcement action, etc.).

The City's Storm Water Ordinance (Chapter 54 of Title 5 of the SPMC) is the principal City ordinance addressing the control of urban runoff. This ordinance is regulatory, and applies to specified new and existing residential and business communities and associated facilities and activities, as well as new development and redevelopment, and all other specified new and existing facilities and activities that threaten to discharge pollutants within the boundaries of the City and within its regulatory jurisdiction, whether or not a City permit or approval is required. The City's Storm Water Ordinance also contains discharge prohibitions and requirements for the implementation of BMPs and other requirements necessary to implement the Permit.

Other City departments require compliance with the City's Storm Water Ordinance as a condition for issuance of relevant City permits. City departments may also impose specific conditions of approval consistent with the City's Storm Water Ordinance. All City environmental ordinances are also implemented, in part, through the application of the California Environmental Quality Act (CEQA) process to proposed projects.

4. Administrative and Judicial/Legal Procedures

In addition to the above authority, the City has in place various legal and administrative procedures to assist in enforcing the various urban runoff related Ordinances, including the following:

A. Administrative Remedies

- General Penalties (SPMC Title 1, Chapter 13 – General Penalties).
- Administrative Penalties and Citations (SPMC Title 1, Chapter 12 – Citations and remedies; SPMC Title 1, Chapter 14 – Administrative citations; SPMC § 54.51 – Administrative citations and remedies).

B. Nuisance Remedies

- Public nuisance under State law.
- City nuisance abatement procedures (SPMC Title 9, Chapter 94 – Nuisances; SPMC § 54.52 – Nuisance).

C. Criminal Remedies

- Misdemeanor citations/prosecution (SPMC Title 1, Chapter 13 – General penalties; SPMC Title 1, Chapter 14 – Administrative citations).

D. Equitable Remedies

- Injunctive relief under State law and the SPMC (SPMC § 54.55 – Civil remedies, injunctions).
- Declaratory relief under State law.

E. Other Civil Remedies

- Federal law claims (e.g., Clean Water Act and Resource Conservation and Recovery Act Citizen Suits).
- Remedies under the California Government Code.
- SPMC § 54.56 – Violations of other laws; SPMC § 54.56 – Other civil remedies
- Violations of the City's Storm Water Ordinance are deemed a "public nuisance," in which case enforcement actions can be completed administratively or judicially when necessary.

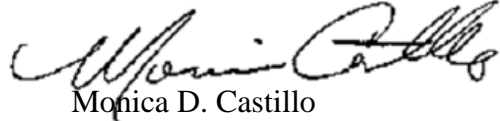
Susana Arredondo, Executive Officer

August 21, 2023

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Please contact me if you have any questions or if you need any additional information regarding the City's legal authority to enforce the Permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Monica Castillo". The signature is fluid and cursive, with the first name "Monica" being larger and more prominent than the last name "Castillo".

Monica D. Castillo
for BEST BEST & KRIEGER LLP