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November 17, 2022

Renee Purdy, Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 W. 4th Street, Suite 200  
Los Angeles, CA 90013-1105

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. Purdy:

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*



Renee Purdy, Executive Officer  
November 17, 2022  
Page 2

*actions can be completed administratively or whether they must be commenced and completed in the judicial system.*

The purpose of this Statement is to describe the City's compliance with Section VI.B.1-B.2. 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, 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



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Renee Purdy, Executive Officer

November 17, 2022

Page 3

- 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 §



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

Renee Purdy, Executive Officer  
November 17, 2022  
Page 4

- 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; );



**BEST BEST & KRIEGER**  
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Renee Purdy, Executive Officer

November 17, 2022

Page 5

- 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.

Renee Purdy, Executive Officer  
November 17, 2022  
Page 6

#### **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 AMC (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



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ATTORNEYS AT LAW

Renee Purdy, Executive Officer

November 17, 2022

Page 7

- 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.

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 cursive script, appearing to read 'Monica Castillo'.

Monica D. Castillo  
for BEST BEST & KRIEGER LLP

MDC:

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

**Annual Report Form  
 Reporting Year [2021-22]**

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

<b>Permittee Name</b>	City of Santa Paula
<b>Permittee Program Contact</b>	Clete Saunier
<b>Title</b>	Public Works Director
<b>Address</b>	866 E. Main Street
<b>City</b>	Santa Paula
<b>Zip Code</b>	93060
<b>Phone</b>	805-933-4212
<b>Email</b>	<a href="mailto:csaunier@spcity.org">csaunier@spcity.org</a>



**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 checked="" type="checkbox"/>	<input 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:

- a. The authorization is made in writing by a principal executive officer or ranking elected official.
- b. 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.)
- c. 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: November 15, 2022

### 3. Program Expenditures

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**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 <sup>1</sup>	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
<b>(1) Program Management<sup>2</sup></b>				\$18,423	\$136,017	\$2,720			\$157,160	\$185,810
<b>(2) NPDES MS4 Permit Fees</b>										
<b>(3) Minimum Control Measures (MCMs)</b>	<b>PIPP</b>			\$1,091.2	\$2,153.1				\$3,244.3	\$3,210.1
	<b>Industrial / Commercial Facilities Program</b>									
	<b>Planning &amp; Land Development Program<sup>3</sup></b>									\$1,040.2
	<b>Construction Program</b>									
	<b>Public Agency Activities Program</b>									
	<b>IDDE Program</b>									
	<b>Additional Institutional BMPs / “Enhanced” MCMs</b>									

<sup>1</sup> Exclude land costs.

<sup>2</sup> 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.

<sup>3</sup> 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 <sup>1</sup>	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
<b>(4) TMDL Implementation Plan / Watershed Management Program Development<sup>4</sup></b>				\$1,433.1	\$1,386.2				\$2,819.3	\$18,862.5
<b>(5) Projects<sup>5</sup></b>	<b>Distributed Projects and Green Streets</b>									
	<b>Regional Projects</b>									
	<b>Other Structural BMPs</b>									
<b>(6) Trash Compliance</b>	<b>Trash TMDLs<sup>6</sup></b>									
	<b>Discharge Prohibitions - Trash<sup>7</sup></b>									

<sup>4</sup> 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.

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

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

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

Category		Capital Expenditures <sup>1</sup>	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
<b>(7) Monitoring</b>	<b>Monitoring Plan Development<sup>8</sup></b>									\$3,362.2
	<b>Outfall and Receiving Water Quality Monitoring</b>	\$119.5		\$4,277.3	\$3,019.1	\$16.4		\$93.4	\$7,525.7	\$12,176.3
	<b>BMP Effectiveness Monitoring</b>									
	<b>Regional Studies<sup>9</sup></b>			\$1,576.4	\$3,895.6				\$5,472	\$5,945.1
	<b>Special Studies<sup>10</sup></b>									
<b>(8) Other<sup>11</sup></b>				\$347.9	\$14,090.4				\$14,438.3	\$13,895
<b>TOTAL</b>		\$119.5	\$0	\$27,148.9	\$160,561.4	\$2,736.4	\$0	\$93.4	\$190,659.6	\$208,922.8

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

*(7) Regional Studies includes SMC/SCCWRP membership costs*

*(8) Other: TMDL monitoring costs are included here \* \$347.9 +\$12,415.60 = \$14,090.40. Principal Program costs associated with Permit renewal activities.*

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

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

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

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



**4. Non-Stormwater Discharge Prohibitions (Reporting Period: September 11, 2021 – June 30, 2022)**

**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](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 (Reporting Period: September 11, 2021 – June 30, 2022)**

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 <sup>12</sup>			
				Total Confirmed	Total Abated	Total Attributed to Allowable Sources <sup>13</sup>	Total Being Monitored
[RW 1]	N/A	0	0	N/A	N/A	N/A	N/A
(add rows as needed)							
<b>Total</b>	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	N/A
NPDES Permitted	N/A
Retention	N/A
Discharge No Longer Observed	N/A
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-

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

<sup>13</sup> “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 requirements as described in the Regional MS4 Permit.*

**6. Minimum Control Measures – Please see attached MCM Forms**

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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 <sup>14</sup> 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?

FY 2023-2024

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>

<sup>14</sup> 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 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, 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].

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?	
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.**

*Refer to Minimum Control Measures reporting forms attached.*

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

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.i]	<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 <sup>15</sup> 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"/>

<sup>15</sup> 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.

- 6.7d) Did you document all public reports of illicit discharges and track all investigations? If no, explain why. [*Order – VIII.1.8*]

*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.

*Note 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.

*(Provide information within this space)*

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.

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

*(Provide additional information within this space)*

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)]

*(Provide information within this space)*

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.

*(Provide information within this space)*

- 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?

*(Provide information within this space)*

**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.

	<b>Retrofitted with Full Capture Systems</b>	<b>Retrofitting Infeasible</b>	<b>Not Retrofitted</b>	<b>Total Number of Catch Basins within Jurisdiction</b>
<b>Owned</b>	7			520
<b>Not Owned</b>				
<b>Total</b>	7			520

*(Provide additional information within this space)*

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.

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

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)

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**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

### 8a. Non-Stormwater Discharge Prohibitions (Reporting Period: July 1, 2021 – September 10, 2021)

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**Complete the following items in this section.**

6.1 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.*

6.2 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.*



6.3 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"/>

6.4 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*

6.5 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](https://codelibrary.amlegal.com/codes/santapaula/latest/santapaula_ca/0-0-0-48044)*

6.6 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.*

6.7 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.

6.8 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"/>

**8b. Non-Stormwater Outfall Screening and Monitoring (Reporting Period: July 1, 2021 – September 10, 2021)**

Complete the following items in this section.

7.1 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 <sup>16</sup>			
				Total Confirmed	Total Abated	Total Attributed to Allowable Sources <sup>17</sup>	Total Being Monitored
[RW 1]	N/A	0	0	N/A	N/A	N/A	N/A
(add rows as needed)							
<b>Total</b>							

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

7.2 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-

<sup>16</sup> “Significant Non-Stormwater Discharges” as identified by the Permittee per Part VII.B of the Attachment E - MRP.

<sup>17</sup> “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

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

*During this reporting period, \*Name of Agency\* has not yet initiated the Non-Stormwater Outfall-Based Monitoring requirements as described in the Regional MS4 Permit.*



# 2015 Statewide Trash Amendments

## City of Santa Paula

### Priority Land Uses

Josh Alessi and Camilla Guzman, Feb 2018

**Proposed Locations**

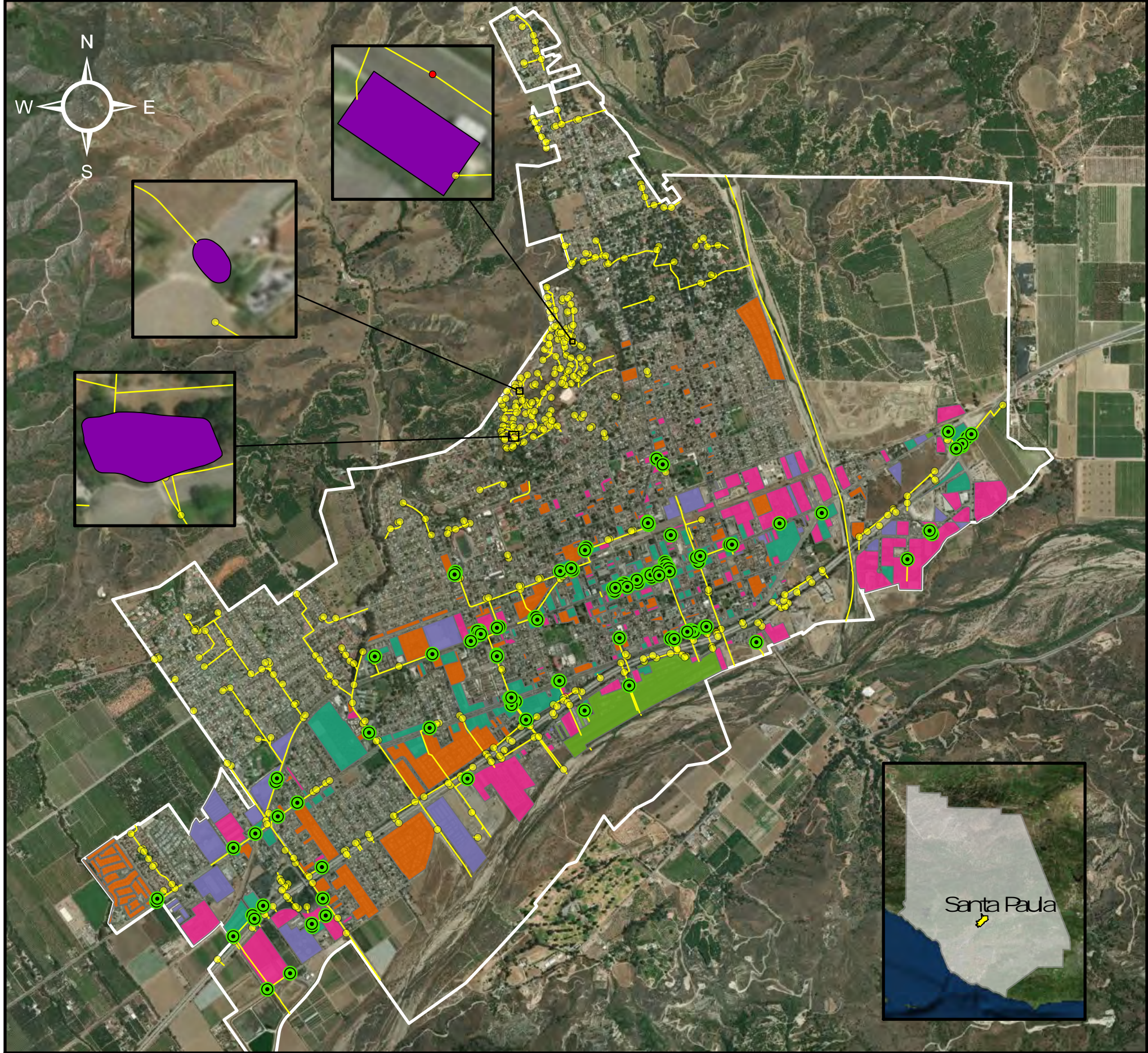
- Full Capture Devices

**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



**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									
15-Dec-2024									
15-Dec-2025									
15-Dec-2026									
15-Dec-2027									
15-Dec-2028									
15-Dec-2029									
15-Dec-2030									
<b>Notations:</b>									
<b>Form</b>	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
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.)									