

## City of Manhattan Beach: Key Actions Called for in the 2012 NPDES Permit Summary of Requirements and Resources

Requirements	Timeline for Implementation	Activities Undertaken	Resource Used	Annual Estimated Cost
<b>Discharge Prohibitions (Part III of the 2012 NPDES Permit)</b>				
4.a. Maintain records of MS4 flows to storm drains for discharge within the City	Ongoing	Staff time for records maintenance and inspection based on reported discharges; Combined with other activities below for Illicit Discharges Elimination Program	Performed In-House	\$2,800: staff time
4.a. Ensure compliance with the permit for non-storm water discharges by implementing Best Management Practice (BMP) control measures for:  Landscape irrigation Dechlorination pools/spas Dewatering decorative fountains Non-commercial car washing Street and sidewalk wash water	Ongoing	Permits are required for dechlorinating pools; business permits with BMP conditions are required for mobile car washes; City outreach is provided on our website for homeowner car washing, irrigation best practices, and sweeping sidewalks in lieu of hosing them down.  Educational materials are provided via print and/or website updates, as well as in local newspapers, at the Counter and at the Hometown Fair. The website is updated on a regular basis using both external and internal resources, such as:	Staff/consultant for development of outreach materials and messaging (\$10,000 for city-specific materials development, printing); and staff time for assistance in development and distribution of materials.	\$6,200: staff time  \$15,000: external for materials/printing; reduced if coordinated jointly
4.b. Minimize discharges of landscape irrigation to public ROW from City facilities and private property	Ongoing	Routine inspection of all parks and city medians, parks and parkways to ensure proper operation and correcting areas where there is overspray and broken irrigation heads.  Outreach to properties with large landscaping when issues are discovered. Educational materials development and printing. Partnerships with West Basin for smart gardening workshops.	<b>Contract Services:</b> Contract landscaping services and public works staff time for inspections, irrigation control, repairs, and responding to complaints.  Staff/consultant for development of outreach materials, which is included in 4.a above.	\$5,500: staff time  \$10,400: external for landscape maintenance and BMPs at storm water facilities. [The total landscaping contract is approximately \$560,000 and includes BMPs to minimize the impact of storm water pollution.]
4.c. Review monitoring data submitted for permitted discharges	Ongoing	Staff reviews monitoring data submitted and identify problem areas. Violations are reported to the Regional Board, and problems that can be identified are resolved.	Performed In-House	\$5,500: staff time
4.d – 4.f. Enforcement of non-storm water discharges	Ongoing	Staff tracks/processes enforcement actions for storm water violations and reports to the Regional Board (RB) as called for in the Permit. Follow up investigations are performed to ensure violations are resolved.	Performed In-House	\$8,500: staff time

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<b>Effluent Limitations and Receiving Water Limitations (Parts IV&amp; V)</b>				
IV.A and V.A. Reduce pollutants in storm water discharges.	Ongoing	Requirements are met through Enhanced Watershed Management Program (EWMP) and Minimum Control Measures (MCM) implementation. Compliance demonstrated through Coordinated Integrated Monitoring Program (CIMP) monitoring. See below for Monitoring and Reporting Program, Watershed Management Program, and MCM activities.	See below for Monitoring and Reporting Program, Watershed Management Program, and MCM Program  Street sweeping and pressure washing to reduce pollutants.	Staff time is incorporated into other actions in this table.  \$378,000: External for street sweeping and pressure washing contract.
<b>Standard Provisions (Part VI.A.)</b>				
A.2. Establish legal authority to enforce permit	As needed	Adopt an/or revise ordinances, statutes, permits, etc. as needed to enforce permit requirements. A significant number of ordinances were adopted between 1992 and 2005, in compliance with the previous three permit issuances.	<b>Performed In-House:</b> City attorney services are needed periodically to review ordinances and memoranda of agreements. Annual resources vary depending on Regional Board actions and City Council initiatives.  <b>Contract Services:</b> Storm water consultant time to prepare draft updates to City's storm water ordinances, as needed.	Staff time and external support vary depending on updated permit conditions and City Council direction.
<b>Monitoring and Reporting Program (Part VI.B. and Attachment E)</b>				
VI.B. Development and update of Coordinated Integrated Monitoring Program (CIMP) to assess progress in meeting effluent and receiving water limitations	CIMP completed and approved Nov. 2015. Revised and approved Oct. 2018.	Manhattan Beach is part of a joint CIMP with Torrance, Hermosa, Redondo, and LA County Flood Control District. There is staff time for review and periodic updates to both the CIMP and multi-jurisdictional MOU, and to ensure CIMP activities are carried out annually. See also Total Maximum Daily Loads (TMDLs; Part VI.E) below.	Performed In-House: The City is the lead agency for the CIMP, administers the contract on behalf of the other agencies, attends meetings and makes updates to the CIMP documents.  Monitoring is performed externally and costs are shared through the MOU.	\$10,000: staff time  \$89,918: external for MB portion of annual monitoring contract for \$486,310 (FY 19/20)
VI.B. Contract for joint monitoring to carry out monitoring activities as required in approved CIMP and prepare annual Integrated Compliance Monitoring Report.	Annually	See VI.B above.	The City shares joint monitoring and reporting activities through contracted consultant services.	Included above in VI.B.
VI.B. Prepare City's Individual Annual Report to be attached to the Watershed Annual Report.	Annually September through submittal to Watershed lead by October 31.	Staff obtains information from various City Departments (Community Development, Engineering, Public Works); compiles budgetary information for past and projected FY; completes individual annual report with data and narratives documenting efforts completed during preceding FY; and enters Low Impact Development (LID) and regional project information for completed projects into the Watershed Reporting Adaptive Management System (WRAMPS).	The majority of data gathering is performed in house by staff, and consultant are utilized to compile, assess and coordinate the data and activities for reporting to the Regional Board.	\$3,600: staff time \$7,300: external for consultant services

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<b>Watershed Management Program and Annual Assessment &amp; Reporting (Part VI.C. and Attachment E: XVII, XVIII, XIX)</b>				
VI.C. Development of a Watershed Management Program (WMP) or Enhanced WMP for each watershed (based on RB's Watershed Management Areas) Manhattan Beach's watersheds are the Santa Monica Bay (J2/3 and J5/6), and Dominguez Channel.	EWMP completed and approved by City Council in June 2015, and the Regional Board in late 2016.  Implementation efforts ongoing.	Review and modifications to EWMP are considered every two years under the Reasonable Assurance Analysis. The latest one was conducted in June 2019 and no significant changes were recommended. However, the Hermosa Greenbelt project was canceled, and during this next biennial phase, staff will be exploring alternative infiltration/diversion/treatment projects. The next review will be completed by June 30, 2021.  Staff regularly attends the Beach Cities meetings to contribute input to the joint implementation effort/process for regional projects to control storm water pollution and discharges.  The Strand Infiltration Project, storm drain capture devices, and Green Streets initiatives under the EWMP.	Utilities Manager or Management Analyst time for 12 Beach Cities meetings per year plus additional time to follow up on action items and track email correspondence.  Additional funding is dedicated to the CIP program for storm water control projects and administered by the Engineering Division.	\$35,500: staff time  CIP: \$210,000 annually for installation of storm drain capture devices; but only \$60,000 in FY19/20  CIP: \$500,000 annually for storm drain repairs.
VI.C. Watershed Annual Report: Implement an assessment program to determine progress of permit implementation and compliance.	Ongoing	Significant staff resources are used to gather data and review prior to compiling information for the annual report.	Data compilation of activities taken to comply with the permit are performed in-house.  Consultant time (up to 100 hours) for preparation of Watershed Annual Report, attending watershed meetings and providing others coordination services throughout the year.	\$9,900: staff time  Up to \$9,980: external for consultant services
VI.C. Control pollutant loads not already identified in a TMDL.	Ongoing	To be determined. This will be based on identification of pollutants that need to be addressed through permit revisions and updates. Capital projects will strive to incorporate those pollutants that require treatment and/or control.	In-house resources.	To be determined.
VI.C. Create strategy for meeting effluent and receiving water limitations based on EWMP findings and recommendations. Assess minimum control measures needed.	Ongoing	Implementation of interim and final milestones is ongoing. This will be reassessed biennially based on EWMP adaptive management findings and recommendations as mentioned above.	Heavy staff involvement in coordination with engineering, beach cities co-permittees and in identifying grant opportunities. An average of 100 staff hours per year.  Staff/consultant time to identify/assess potential projects and locations (storm water consultant costs for FY19/20 are included both above in VI.C Development of the EWMP and below in grant assistance allocation).	\$14,000: staff time
VI.C. Grant applications or revolving loan applications for funding to implement EWMP	Ongoing	Both staff and consultants identify and prepare grant applications for storm water projects, such as the Proposition 1, Proposition 40, Measure W (upcoming) and CalTrans.	Both in-house and consultant resources are used. Staff is actively seeking funding for its Manhattan Beach Infiltration Trench and green street projects, which is currently unfunded at \$8 million.	\$8,500: staff time  Consultant costs TBD

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VI.C Implementation of EWMP capital projects	Ongoing	City staff time for contracting and coordinating design and construction services and construction management	Approximately 200-300 staff hours per year for the Green Streets project and storm drain capture devices.	Captured in VI.C (1) above.
<b>Minimum Control Measures (Part VI.D)</b>				
VI.D.2. Progressive enforcement for violations: follow-up inspections, enforcement, records retention, referral of violations, investigation of complaints; Regional Board assistance with enforcement.	Ongoing	Staff time based on different categories of inspection: building & safety (LID and construction), Public Works and Code Enforcement for commercial and non-storm water discharges. Assume that first necessary follow-up inspection is included in time for routine inspections, and progressive enforcement is triggered for facilities not brought into compliance; multiple follow-ups are often necessary.	Depends on number of violations observed.	\$4,000: staff time
VI.D.3. Coordination of MCM requirements and Permit requirements in general and manage documentation.	Ongoing	Staff coordinates and manages documentation of cross-departmental effort to implement permit. Staff also attends bi-monthly LA Permit Group Meeting and participates in Permit negotiations/renewal process. A consultant attends Regional Board Workshops on next permit to represent Manhattan Beach (shared with other south bay cities)	In-house resources and consultant services!	\$12,800: staff time  \$2,500: external for consultant services
VI.D.5. <b>Education Program:</b> Measurably increase knowledge, change disposal habits and engage various groups. Report clogged drains and get misc. storm water information out. May participate in 888-CLEAN LA, post on website. Organize events to promote storm water pollution prevention.	Ongoing	Funding for materials and staff time for hosting/coordinating public outreach events as identified above.	Staff overtime cost for outreach events throughout the year (e.g., Hometown Fair) and for coordinating overall materials, messaging and website updates; general storm water outreach materials, PSAs, school outreach summary and costs are included above in Part III, 4.a above.	\$3,000: staff time
VI.D.6. <b>Industrial/Commercial Facilities Program:</b> Track, educate, inspect, ensure compliance. This includes database of lat/long of all industrial/commercial facilities that are critical source of storm water pollution [e.g., restaurants, automotive, gas stations, nurseries]. Update annually. Implementation of a Business Assistance Program.	Within permit term.	One education notification must reach each facility and two mandatory compliance site visits must occur for industrial/ auto/ other commercial facilities within 5-year permit. Annual restaurant inspections must be conducted per EWMP and MCM.  Consultants perform the site inspections and follow-up for any violations found during inspections. City staff provides tracking and educational materials, ensures compliance and conducts enforcement action when needed.	Coordination and tracking efforts are included in the coordination line item above via staff and consultant services.	\$5,000: staff time  \$32,000: external for Clean Bay Certified/FOG inspections contractor (FY19/20).

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VI.D.7. <b>Planning and Land Development</b> activities for new and redevelopment projects that meet certain thresholds: Track development and redevelopment projects for reporting annually to the Regional Board. Follow up inspection of City LID BMPs biennially. Adopt ordinances where necessary.	Ongoing	<p>Training on new Low Impact Development measures and inspection services.</p> <p>Tracking of LID BMP projects completed using WRAMPs LID template spreadsheet or LID Project Information Form.</p> <p>Revision of Ordinance (if needed) and Developer Guide depending on changes occurring in 5<sup>th</sup> term permit.</p> <p>Biennial inspection of City BMPs to ensure proper maintenance.</p>	<p>Classes and consultants and utilized annually to train CommDev and Public Works engineers and inspectors.</p> <p>City staff time to track LID BMPs at development sites. This will vary based on projects requiring LID's.</p> <p>City staff/storm water consultant time to revise City's municipal code to address any LID changes required by the 5th term LA MS4 Permit. An estimated 80 staff hours. City Attorney fees for review of revised ordinance. Consultant time used to peer review City projects and large development projects that may impact the ROW.</p>	<p>\$13,700: staff time</p> <p>\$10,000: external for staff training</p> <p>TBD depending on updates and review services needed.</p>
VI.D.8. <b>Development Construction Planning:</b> Control sediment runoff from construction sites one acre or greater. Control polluted discharges from all sites, regardless of size. Implement construction inspection and enforcement program. Create a construction site inventory that is continuously updated.	Ongoing	<p>Education, inspection, tracking violations and enforcement. Staff time to review Erosion and Sediment Control Programs (ESCP) and Storm Water Pollution Prevention Plans (SWPPPs) and to maintain construction site inventory.</p> <p>Additional inspection services; heavy inspection requirements for sites greater than 1-acre (every two weeks plus when it rains or is likely to rain). Inspections are required prior to, during and after land disturbance and construction.</p> <p>Education and training of Community Development staff at least once per permit term with training of new staff within 180 days. Public Works Engineers and inspectors trained annually plus familiarity with Construction General Permit requirements.</p>	<p>Staff time for tracking CIP projects performed by Public Works Engineers/inspectors. Building &amp; Safety tracks small and large private construction site inspections, violations, enforcement. Staff time is also used to conduct inspection and enforcement activities.</p> <p>Funding for MS4 Permit training sessions by storm water consultant once per permit cycle and is included in VI.D.7 above.</p>	<p>\$4,200: staff time</p> <p>Consultant cost included in VI.D.7</p>
VI.D.9. <b>Public Agency Activities:</b> Minimize pollutants from city facility and projects. Conduct public facility inventory (1x w/in five years), identify retrofitting opportunities, and implement appropriate BMPs (Table 18 of the permit), storm drain stenciling, storm drain maintenance, street sweeping, employee training programs.	Ongoing	<p>Training for PW, Planning and Parks staff is required. BMP implementation where necessary, such as improvements to public parks and facilities to control pollutants in runoff.</p>	<p>City staff/PW staff time for periodic (quarterly) inspection of public facilities to ensure appropriate BMPs are in place and well maintained.</p> <p>Consultant time used for annual refresher training of Public Works staff. Training following issuance of 5<sup>th</sup> term permit.</p>	<p>\$14,000: staff time</p> <p>\$3,500: external for annual PW staff refresher training and training of new staff</p>

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<b>VI.D.10. Illicit Connections/ Illicit Discharge (IC/ID) program:</b> Ensure legal authority to enforce Illicit Connections/Illicit Discharges. Investigation of storm drains for IC/ID. Development of a spill response plan. Promotion of a reporting hotline and documenting calls received. Appropriate signage. Staff training on the IC/ID program.	Ongoing	<p>Implementation of the IC/ID program, which includes investigation and documentation of illicit discharges and/or connections and oversee corrective actions.</p> <p>Training of all City staff responsible for responding to IC/ID twice during permit term, and new staff within 180 days of hiring.</p> <p>Storm drain CCTV inspection (baseline) and building into tablet apps for historical documentation, and for development of a spill response plan.</p>	<p>City staff time to investigate, document and respond (enforcement) of IC/IDs.</p> <p>Funding for MS4 Permit training sessions by storm water consultant once per permit cycle is included in VI.D.7 above. As needed consultant services for IC/ID support, depending on number of violations found.</p>	<p>\$10,000: staff time CIP: \$150,000 for CCTV inspections.</p> <p>Consultant cost included in VI.D.9</p>
<b>Total Maximum Daily Loads (TMDLs; Part VI.E)</b>				
<p>Ensuring compliance with TMDL provisions, which includes monitoring at key locations, preparation of an annual Trash TMDL compliance report, City's responsibilities for regional and distributed projects identified in the EWMP.</p> <p><b>SMB TMDLS:</b> trash/debris, bacteria and DDT/PCBs <b>Dominguez Channel TMDLs:</b> heavy metals and other toxic pollutants</p>	<p>Ongoing</p> <p>Reports due in December of each year.</p>	<p>Weekly water quality monitoring implementation, compliance and review.</p> <p>Regional and distributed project (CIP) development and implementation. Development and implementation of TMDL strategy and compliance.</p>	<p>Outside resources used for water quality monitoring and data compilation. Staff time to review data.</p> <p>Consultant time for assistance with developing strategy for meeting trash TMDL/provisions, and CIP project development and design services. City staff time for project implementation and construction.</p>	<p>Water Quality monitoring costs included in VI.B.</p> <p>\$8,500: staff time</p> <p>\$7,000: external in FY 19/20 for strategy development and review assistance. CIP project support to be determined, with some costs already identified in the CIP and listed above in VI.C.</p>
<b>Measure W: Safe Clean Water (SCW) Expenditures</b>				
City's annual report of expenditures documenting how the City's local return from Measure W is expended.	Annually beginning in FY19/20	<p>The responsibilities of each municipality receiving Municipal Program funding from the SCW Program shall include, but not be limited to:</p> <ol style="list-style-type: none"> <li>Preparation of a progress/expenditure report that details a program- level summary of expenditures and a description of Water Quality Benefits, Water Supply Benefits, Nature-Based Solutions, and Community Investment Benefits realized through use of Municipal Program funds.</li> <li>Compliance with all SCW Program fund transfer, reporting, and audit requirements.</li> </ol>	Staff time for reporting, tracking and prioritizing funding allocation.	Internal and external needs not yet determined.

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		<div>3. Engagement with Stakeholders in the planning process for use of the Municipal Program funds during the planning and implementation of Projects and Programs.</div> <div>4. Prioritization and development of Projects that, to the extent feasible, assist in achieving compliance with MS4 Permit.</div>		
Representation on Watershed Management Committee	Ongoing	Coordinate and advise on Measure W regional project funding allocation and eligibility criteria.	Staff time for attending meeting and reviewing projects.	Internal and external needs not yet determined.