FORM GEN. 160 (REV. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: April 13,, 2026

TO: Honorable Adrin Nazarian
Honorable Katy Yaroslavsky
Honorable Ysabel Jurado
Honorable Nithya Raman
Honorable Imelda Padilla
Energy and Environment Committee

FROM: Traci Minamide, Interim Executive Director and General Manager
Los Angeles Sanitation and Environment

SUBJECT: RESPONSE TO INSTRUCTION OF COUNCIL FILE: 22-0600-S54 FOR THE LOW IMPACT DEVELOPMENT (LID) ORDINANCE

RECOMMENDATIONS:

That the City Council, subject to approval of the Mayor,

1. Maintain the current Low Impact Development (LID) Ordinance No. 188125 and adopt the revised development service fees for the LID Program, together with the associated staffing levels necessary to provide full cost recovery, as further detailed in the fee study in Appendix G of this report.

2. Direct the City Attorney to work with the Bureau of Sanitation (LASAN) to explore legal mechanisms to authorize staff to inspect LID infrastructure on private property and to establish enforcement authority to issue penalties for unpermitted removal of required Best Management Practices, as further detailed in Appendix J of this report.

BACKGROUND

Los Angeles Sanitation and Environment (LASAN) is the City's lead agency for ensuring compliance with the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit, under which post-construction stormwater requirements are implemented through the Low Impact Development (LID) Program.

In 2011, the City revised Los Angeles Municipal Code Section 67.40 to implement LID requirements consistent with updated MS4 State Permit provisions. At that time, the City adopted applicability thresholds that exceeded those in the permit. While the MS4 Permit mandates compliance with LID requirements for projects that add, create or replace 2,500 square feet or more of impervious area, the Municipal Code, required compliance by projects that addressed or replaced 500 square feet or more of impervious area. This more stringent approach was intentionally adopted to expand stormwater mitigation and accelerate progress toward Citywide stormwater management objectives during a period when dedicated funding for City-led stormwater compliance projects was limited. Over time, this approach significantly increased the number of projects subject to LID plan check and inspection, resulting in substantial administrative workload and staffing demands. These challenges were compounded by operational disruptions associated with the COVID-19 pandemic, which contributed to growing plan check backlogs and extended review timelines. Subsequent voter approval of Measure W provided a stable funding source for City-led stormwater compliance projects, allowing the City to pursue larger-scale, regional stormwater strategies and reducing reliance on small private development projects to achieve regulatory volume capture goals.

As part of the 2022–23 Budget deliberations under Council File 22-0600-S54, the City directed LASAN to evaluate LID Program performance, customer service impacts, and resource demands. Following this evaluation, the City adopted Ordinance No. 188125, effective April 2, 2024, which revised LID applicability thresholds to conform with State Permit requirements. Under the current ordinance, LID requirements are focused on larger-scale projects and projects located in environmentally sensitive areas, while most small-scale projects, including the majority of Accessory Dwelling Units (ADUs), are no longer subject to LID requirements. Council further directed LASAN to report back on program outcomes following adoption of the revised ordinance and to evaluate development service fees and staffing levels necessary to support the LID Program and achieve full cost recovery. Detailed data, supporting analyses, and additional materials responsive to the Council's direction are provided in the appendices in addition to this report.

ORDINANCE CHANGES AND PROGRAM OUTCOMES

Following adoption of Ordinance No. 188125, the LID Program experienced a substantial reduction in the number of projects subject to plan check and inspection requirements. This change results from the revised applicability thresholds, which refocused LID requirements on larger-scale development projects.

For clarity, this report uses the same ordinance scenarios referenced in the LID fee study (Appendix G) to describe this transition. Under the previous ordinance (Ordinance No. 183833, referred to as *Scenario 1* in the Appendix), LID compliance was required for projects that added, created, or replaced **500 square feet** or more of impervious area, **capturing both small-scale and large-scale development projects**. Under the current ordinance (Ordinance No. 188125, referred to as *Scenario 2* in the Appendix), the lowest threshold that requires LID is projects that add, create, or replace **2,500 square feet** or more of impervious area and are located within environmentally sensitive areas.

Comparing the past ordinance (baseline period 2020–2023) to the current ordinance (calendar year 2025), the number of plan check projects cleared by the LID Program decreased by approximately 59%, while the total stormwater volume mitigated through constructed LID projects decreased by approximately 15%. It should be noted that calendar year 2024 and 2025 reflects a transitional period, as some projects subject to the previous ordinance continued to complete plan check and inspection under prior requirements. Stormwater volume captured through the program is driven primarily by larger-scale projects, with additional capture from small-scale projects providing environmental benefit but contributing relatively limited incremental volume relative to program workload.

Table 1. LID Program Workload and Stormwater Mitigation Comparison

Metric	Past Ordinance (2020-2023)	Current Ordinance (2025)	Percent Change
# of Plan Check Projects Cleared	4,551	1,869	↓ 59%
Acres of Impervious Area Mitigated	316	270	↓ 15%
Acre Feet of Stormwater Volume Mitigated	22.3	19.0	↓ 15%

Service delivery performance improved following adoption of the current ordinance. The time to clear both plan check and give Certificate of Occupancy approvals improved, and average weekly backlog levels were reduced as projects subject to the prior ordinance continued to phase out through the system. ***Table 2*** summarizes high-level trends in clearance time and backlog under the past and current ordinances.

Table 2. LID Review Timelines and Backlog Trends

Metric	Past Ordinance (2020-2023)	Current Ordinance (2025)
Average Plan Check Clearance Time	~106-145 days	~6-49 days
Average Certificate of Occupancy Clearance Time	~8-23 days	~14-35 days
Average Weekly Backlog	~746 projects	~188 projects

As projects subject to the previous ordinance complete review, further reductions in clearance duration and backlog are expected over the next two years; especially for Certificate of Occupancy (C of O). For Calendar year 2025 the number of Plan Check applications cleared by LID decreased by 46% from the prior year, whereas the number of C of O applications cleared by LID decreased by 21%. A significant reduction in C of O application cleared by LID is expected in 2026 and thereby a significant reduction in Clearance time.

FEES, STAFFING, AND COST RECOVERY

The LID Program provides plan check and inspection services for private development projects subject to post-construction stormwater requirements. These services are funded through development service fees; however, the program has historically been partially subsidized by the Stormwater Pollution Abatement Charge (SPA), resulting in a portion of development-related plan review and inspection costs being borne by stormwater ratepayers rather than fully recovered through development service fees. As SPA-funded activities are partially supported by the City's General Fund, this subsidy also resulted in indirect General Fund support of development-related program costs.

The fee study further detailed in Appendix G of this report found that under the previous LID Ordinance No. 183833, approximately 59%, or $2.4 million, of the LID Program's costs were subsidized by SPA. The revised development service fees proposed in Table 3 for both scenarios are intended to reduce reliance on SPA, better align program costs with development activity, and provide full cost recovery for the LID Program.

Table 3. LID Development Service Fees by Ordinance Scenario

Service Type		Current Fees	Proposed Fees*	
Name	Description		Past Ordinance	Current Ordinance
Plan Check "P17"	Small scale residential projects (≤ 4 units)	$200.00	$459.00	----
Plan Check "P18"	Projects in Environmentally Sensitive Areas	$1,050.00 (Expedited)	$1,103.00	$1,063.00
Plan Check "P19"	Large Scale projects (developing < 50% of their lot)	$1,200.00 (Expedited)	$1,470.00	$1,417.00
Plan Check "P20"	Large Scale projects (developing ≥ 50% of their lot)	$1,500.00 (Expedited)	$1,838.00	$1,771.00
Certificate of Occupancy	Inspection	----	$294.00	$283.00

*The proposed fees eliminate the need for separate regular versus expedited plan check fees for P18, P19, and P20 projects because all projects will be reviewed faster than the current expedited plan check time. As currently 68% of projects opt to have their project reviewed as expedited, the highest rate change is less than 22.5% among P18, P19, and P20 projects; those increases are less if the current ordinance remains in place.

In addition to fee impacts, the ordinance selected by Council has direct implications for staffing

and operational resource needs. Table 4 summarizes the staffing and resource requirements associated with administering the LID Program under the current ordinance compared to reverting to the prior ordinance.

Table 4. LID Program Resource Implications by Ordinance Scenario

Resource Category	Past Ordinance	Current Ordinance
Authorized Staffing	Requires 1 additional Engineer Associate II	Maintains existing staffing levels
Consultant Services	Approximately $1 million annually	None required
Overtime	Approximately $400,000 annually	Eliminated

Maintaining the current LID ordinance allows the program to operate within existing staffing levels, eliminate reliance on overtime and consultant services, and continue improvements in turnaround time and backlog while achieving full cost recovery through updated development service fees.

CONCLUSION

Based on the analysis presented in this report, LASAN recommends adoption of the revised development service fees and corresponding staffing levels, to provide full cost recovery for the LID Program, as further detailed in the fee study in Appendix G. LASAN also recommends establishing enforcement authority to address unpermitted removal of required Best Management Practices.

This approach reflects LASAN's evolution toward cost-effective stormwater management that maintains environmental protection with regulatory requirements, supports improved service delivery, and ensures fiscal responsibility.

APPENDIX BACKGROUND

The supporting data, analysis, and justifications included in Appendices A through E, provide a comparison between calendar years 2020-2023 (baseline), 2024, and 2025. The baseline represents the average LID metrics from 2020-2023; projects subject to the previous LID Ordinance (183833). Calendar Years 2024 and 2025 demonstrate the immediate effects of the revised LID Ordinance (188125). Additionally, a more detailed look over the 8 quarters in 2024-2025, shows the gradual effect of the LID Ordinance revision. The data being provided was extracted from various programs used by LASAN: LID Portal, Customer Service Request (CSR), MS4Front, and BuildLA.

- LID Portal: An online application used by LASAN that provides applicants the opportunity to submit their building permit application documents. This program will migrate into the CSR system by the end of February 2026, in an effort to consolidate the systems that applicants need to navigate through.

- CSR: The Bureau of Engineering, Bureau of Street Services, Department of City Planning, and LASAN utilize this application to process general questions and requests. LASAN has further modified this application to accept building permit application documents.

- MS4Front: A program used by LASAN to archive approved building permit documents. The integration of this program with BuildLA is planned by the end of 2026. MS4Front currently requires manual inputs from the LID Portal, resulting in the need for QA/QC; the intent is to allow for this archiving to be done automatically, helping to reduce staff time processing clerical aspects of the permitting process.

- BuildLA: A program used by the various city departments involved in the building permitting process, which allows applicants to book appointments and review their permit status.

Additionally, while the LID Counter processes four types of applications (listed hereunder), the data provided will primarily focus on the two permitting processes that require a clearance: Plan Check and Certificate of Occupancy.

- **Plan Check**: A review of the construction plans, to ensure that BMP measures are incorporated into the design of development and redevelopment projects

- **Certificate of Occupancy (C of O)**: A review of the construction to ensure that the BMP measures approved during Plan Check were adequately installed.

- **Restamp**: Stamping a new set of plans for a project that was previously stamped and approved by LID, but has since undergone changes that do not affect the previously approved BMP systems.

- **Planning Case Referral Form**: A form required as part of the entitlement process with City Planning; a preliminary review of the proposed development or redevelopment is provided to guide applicants on LID requirements.

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APPENDIX A

Permit status of all applications submitted, with breakdown by impervious area.

A breakdown of active applications submitted to LID for clearance broken down by service type is provided in the table below. The data provided is a snapshot of applications status on January 15, 2026. Active projects are those that have provided an update on their application within the last 18 months. After 18 months of inactivity, LID removes the application from our system, but saves records internally in case the applicant returns for processing.

Impervious areas are identified during review and are not tracked until clearance is issued. Impervious areas for cleared applications are provided in Appendix D.

Small Scale Plan Check Applications			
Last Updated	# of Applications	In review	Pending Applicant Response
0-1 Day	15	11	4
2 Days-6 Months	219	0	219
6-12 Months	132	0	132
12-18 Months	159	0	159
Total	525	11	514

Current Small Scale Plan Check applications are reviewed within 1 business day of their submittal or resubmittal. Of the 525 active applications, 514 have been reviewed and we are awaiting a response from the applicant to proceed with the review. 291 projects have not responded in more than 6 months.

Large Scale Plan Check Applications			
Last Updated	# of Applications	In review	Pending Applicant Response
0 Days-2 Weeks	76	29	47
2 Weeks-4 Weeks	32	6	26
4 Weeks- 6 Months	118	0	118
6-12 Months	58	0	58
12-18 Months	47	0	47
Total	331	35	296

Current Large Scale Plan Check applications are reviewed within 2 weeks for all resubmittals. All first time Plan Checks are reviewed with 3 weeks for expedited review and 5 weeks for regular plan check. Of the 331 active applications, 296 have been reviewed and we are awaiting a response from the applicant to proceed with the review. 105 projects have not responded in more than 6 months.

Certificate of Occupancy Applications			
Last Updated	# of Applications	In review with LID	Pending Applicant Response
0-1 Day	27	18	9
2 Days-6 Months	302	0	302
6-12 Months	105	0	105
12-18 Months	93	0	93
Total	527	18	509

Current C of O reviews (Small Scale and Large Scale) are reviewed within 1 business day of their submittal or resubmittal. Of the 527 active applications, 509 have been reviewed and we are awaiting a response from the applicant to proceed with the review. 198 projects have not responded in more than 6 months.

Plan Restamp and Planning Case Referrals are currently reviewed within 1 business day of their submittal or resubmittal. There were no active applications for either of these services on January 15, 2026.

APPENDIX B

Plan review metrics by plan check service category, including review duration, virtual counter data, and backlog.

A breakdown of the cleared LID applications, quarterly for 2024-2025, and annually for calendar years 2020-2023 (baseline), 2024, and 2025, including the review duration, and plan check service category, as well as virtual counter and backlog information is provided below.

The average clearance includes the review duration and the time an applicant takes to respond. It represents the average clearance for projects that were submitted in the specified time period. For example, for Q1 2024, for the *Residential 4 Units or Less* projects that submitted in Q1 2024 that have since been cleared, they were cleared in an average of 82 days.

Quarterly Data from MS4Front for Plan Check including Review Duration

Time Period	Residential 4 Units or Less		All Other Plan Checks	
Quarter	Cleared	Average Clearance (Days)	Cleared	Average Clearance (Days)
Q1 2024	1092	82	135	152
Q2 2024	742	97	183	118
Q3 2024	635	63	177	108
Q4 2024	368	53	175	86
Q1 2025	328	31	136	80
Q2 2025	284	21	145	52
Q3 2025	356	10	167	27
Q4 2025	291	6	162	5

Yearly Data from MS4Front for Plan Check including Review Duration

Time Period	Residential 4 Units or Less		All Other Plan Checks	
Calendar Year	Cleared	Average Clearance (Days)	Cleared	Average Clearance (Days)
Baseline	3,823	104	571	220
2024	2,837	79	670	118
2025	1,259	16	610	42

Quarterly Data from MS4Front for Certificate of Occupancy including Review Duration

Time Period	Residential 4 Units or Less		All Other Plan Checks	
Calendar Year	Cleared	Clearance (Days)	Cleared	Clearance (Days)
Q1 2024	613	26	87	29
Q2 2024	674	27	72	40
Q3 2024	650	35	81	49
Q4 2024	640	38	108	35
Q1 2025	615	30	68	39
Q2 2025	542	32	83	47
Q3 2025	485	25	86	29
Q4 2025	360	14	73	14

Yearly Data from MS4Front for Certificate of Occupancy including Review Duration

Time Period	Residential 4 Units or Less		All Other Plan Checks	
Calendar Year	Cleared	Clearance (Days)	Cleared	Clearance (Days)
Baseline	2,357	15	319	27
2024	2,577	32	348	39
2025	2,002	27	310	36

Virtual Counter Metrics

LASAN was the lead agency implementing the BuildLA Virtual Counter when the program launched in June of 2022. At that time, LID had 14 full time plan check staff, including consultant staff, servicing the Virtual Counter Monday thru Friday. However, by May 2024, only 6 full time plan check staff were available to service the Virtual Counter because funding for consultant staff was exhausted. As a result, operational changes required that Virtual Counter services be limited to Wednesdays.

Starting in January 2025, and in response to feedback from applicants, the Virtual Counter was replaced with increased virtual appointments, as the queue was often long and many of the customers could not be served the same day. This change in operations allows for a more transparent and equitable method for applicants to meet with LID Counter staff. The metrics provided for Virtual Counter are up until December 2024.

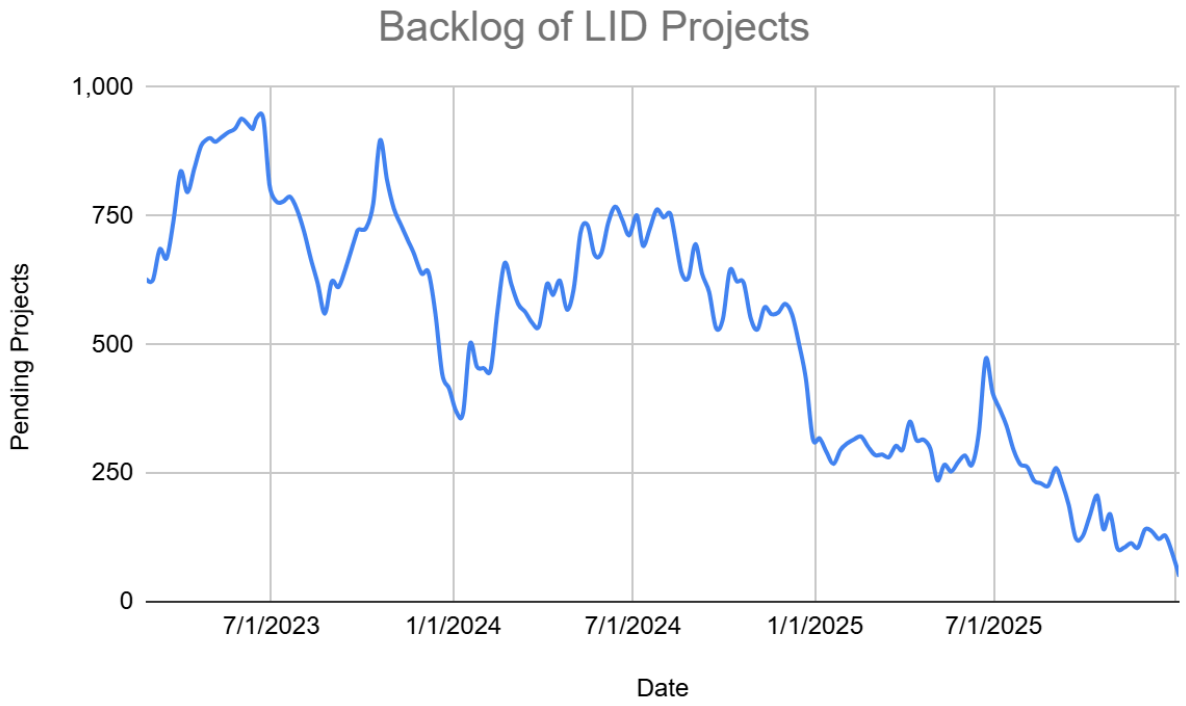
Timer Period	Customers in queue	Customers Serviced	Customers Not Serviced*	% of Customers Serviced	Avg. Wait Time (minutes)
June 2022	900	704	196	78	11
Q3 2022	6,450	4,531	1,919	70	52
Q4 2022	6,254	4,602	1,652	74	41
Q1 2023	7,065	4,999	2,066	71	108
Q2 2023	12,011	2,609	9,402	22	193
Q3 2023	7,732	3,744	3,988	48	157
Q4 2023	9,511	3,417	6,094	36	198
Q1 2024	8,407	4,382	4,025	52	182
Q2 2024	5,239	1,450	3,789	28	184
Q3 2024	2,535	357	2,178	14	179
Q4 2024	1,567	304	1,263	19	188

*Includes customers who left the queue before service time, did not show up at service time, or was not served prior to closing time.

Backlog Metrics

Since February 24, 2023, a weekly snapshot of the pending projects that remain with LID has been taken. This weekly snapshot is used to generate a list of projects that staff review throughout the course of the week when not servicing an appointment or walk-in; ensuring that projects are reviewed in the order received. The backlog is the number of projects that have submitted an application to LID and are pending a review by LID.

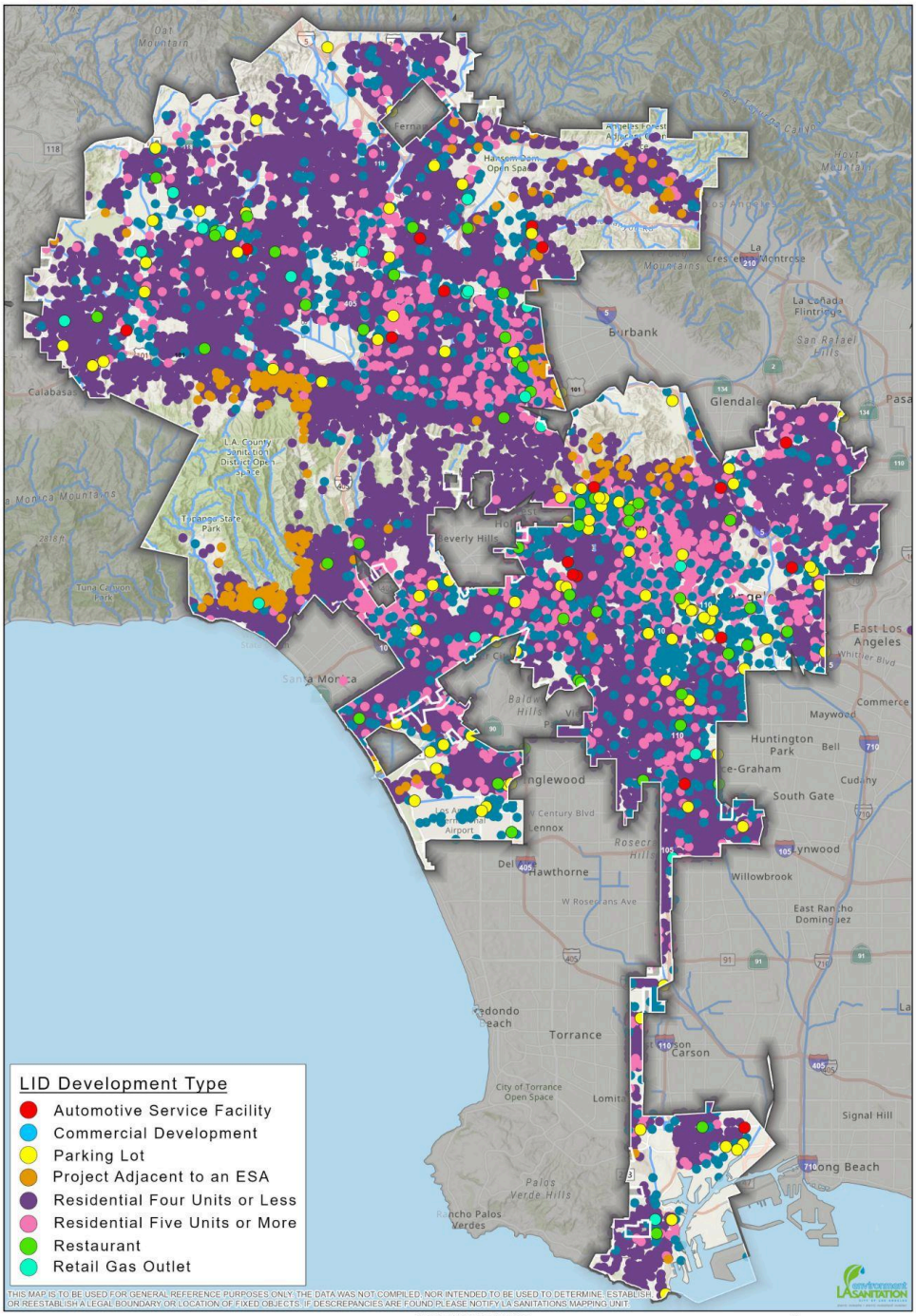
The backlog of projects pending a review with LID reached its highest total in June 2023 (940) and its lowest in January 2026 (49).



APPENDIX C.

Development type and geographic distribution of all LID projects.

A geographic distribution of LID Projects by Development Type for constructed LID projects from 2011 to 2025 and for Calendar Year 2024 and 2025 are provided below.



LID ORDINANCE

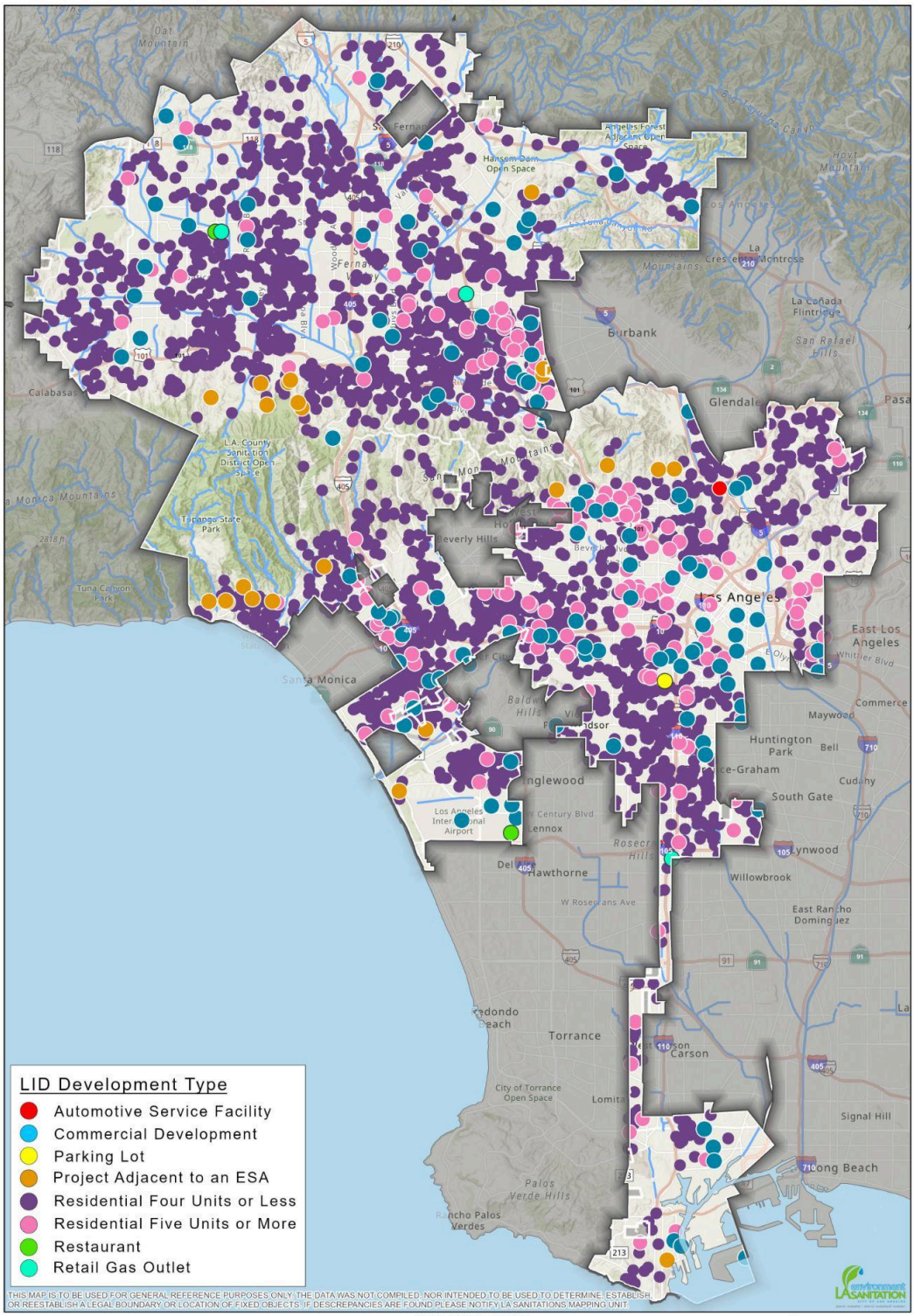
LID Projects Constructed for Calendar Year 2011-2025

DRAWN BY:	DATE CREATED:	CHECKED BY:	DATE REVISED:
NH	2-10-26	OHM	

KAREN BASS
Mayor
CITY OF LOS ANGELES

TRACI MINAMIDE
Interim Director and General Manager
LA Sanitation & Environment

TARANEH NIK-KHAH
Acting Division Manager
Watershed Protection Division



LID ORDINANCE

LID Projects Constructed for Calendar Year January 2024 - December 2024

DRAWN BY:	DATE CREATED:	CHECKED BY:	DATE REVISED:
NH	2-10-26	OHM	

PRO_AR_LIDExecutive

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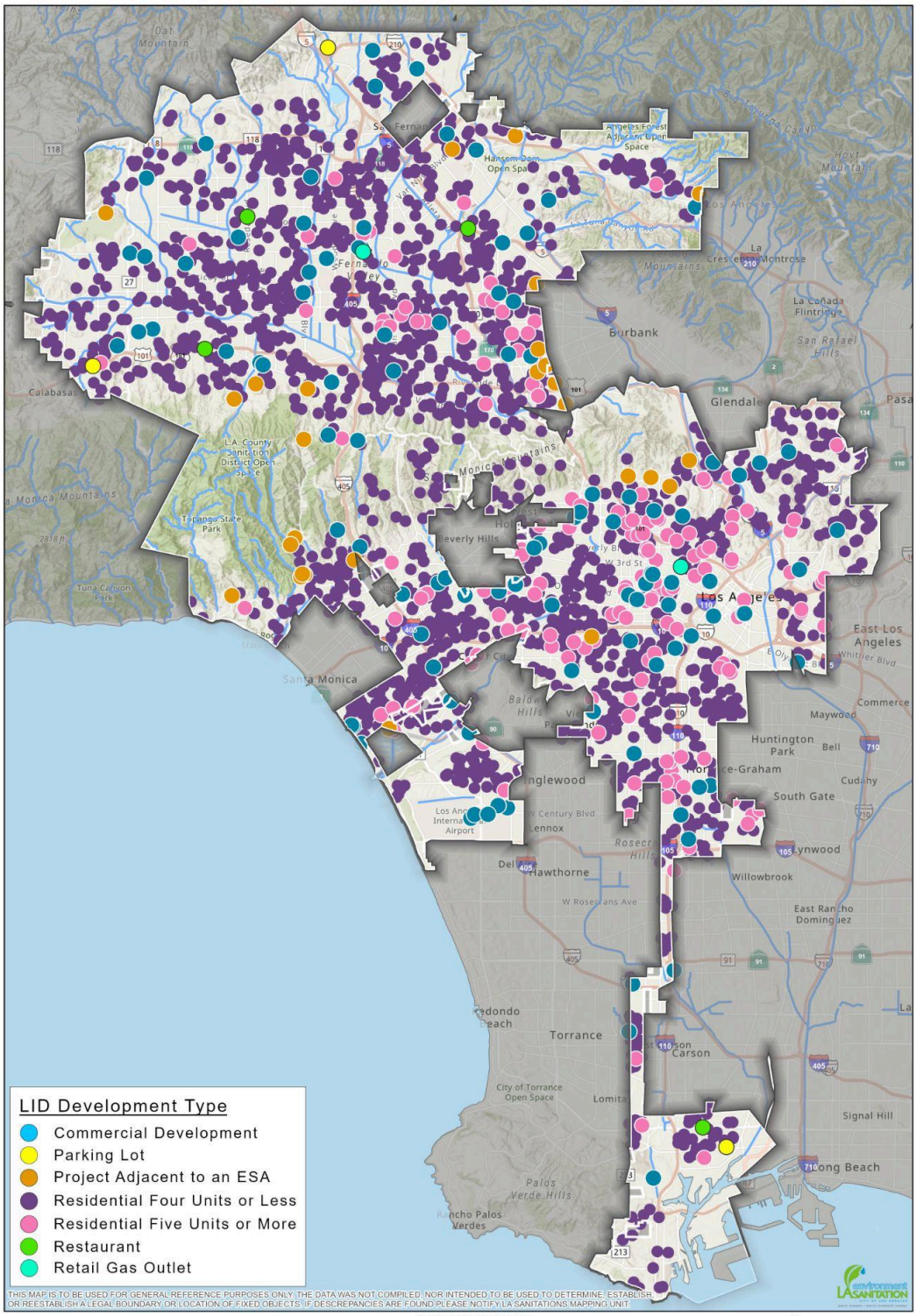

LID ORDINANCE

LID Projects Constructed for Calendar Year January 2025 - December 2025

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NH	2-10-26	OHM	

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APPENDIX D

Volume of stormwater captured and impervious area mitigated by LID projects.

A breakdown of the cleared LID applications, quarterly for 2024-2025, and annually for calendar years 2020-2023 (baseline), 2024, and 2025, including the volume and impervious area is provided below. The totals from 2011-2025 are also provided.

Quarterly Data from MS4Front for Plan Check and Certificate of Occupancy.

Time Period	Plan Check			Certificate of Occupancy		
Calendar Year	Cleared	Impervious Area Mitigated (Acres)	Volume Mitigated (Acre Feet)	Cleared	Impervious Area Mitigated (Acres)	Volume Mitigated (Acre Feet)
Q1 2024	1227	87.7	6.0	700	59.0	4.0
Q2 2024	925	125.7	9.0	746	141.7	9.4
Q3 2024	812	92.1	6.5	731	62.5	4.1
Q4 2024	543	57.0	3.8	748	112.7	7.5
Q1 2025	464	48.8	15.1	683	82.5	5.6
Q2 2025	429	46.6	3.5	625	75.6	5.4
Q3 2025	523	29.6	1.9	571	59.1	4.2
Q4 2025	453	41.4	3.1	433	52.1	3.7

Yearly Data from MS4Front for Plan Check and Certificate of Occupancy.

Time Period	Plan Check			Certificate of Occupancy		
Calendar Year	Cleared	Impervious Area Mitigated (Acres)	Volume Mitigated (Acre Feet)	Cleared	Impervious Area Mitigated (Acres)	Volume Mitigated (Acre Feet)
Baseline	4,394	433	31.7	2,675	318	22.9
2024	3,507	363	25.3	2,925	376	25.0
2025	1,869	166	23.6	2,312	270	19.0

From 2024 to 2025, the number of projects cleared for Plan Check decreased by 59%, while the impervious area and volume mitigated by constructed projects decreased by 15%

Time Period	Plan Check			Certificate of Occupancy		
Total	Cleared	Impervious Area Mitigated (Acres)	Volume Mitigated (Acre Feet)	Cleared	Impervious Area Mitigated (Acres)	Volume Mitigated (Acre Feet)
2002-2025	56,371	8,478	513.0	26,506	3,766	227.9

APPENDIX E

Breakdown of categories of Best Management Practices implemented on LID projects.

A breakdown of the primary BMP types implemented by LID projects, by calendar year is provided below. The data reflects that Harvest and Reuse (61%) and On-Site Biofiltration (31%) are the primary BMPs proposed by LID Projects. Below is the total number of LID Projects that have implemented BMPs since 2011.

The following criteria were used to provide the data.

- Only projects that receive Certificate of Occupancy from LID have had their BMP systems reviewed and approved, so only these projects can be used to demonstrate the BMPs implemented.
- While many projects provide multiple BMPs, only the primary BMP was used to categorize the BMP Type used per project.
- BMP Types as Categorized by the MS4 Permit
    - Harvest and Reuse: BMP that captures and retains stormwater runoff for beneficial use, typically for irrigation. This included Cisterns, Rain Tanks, Rain Barrels, and proprietary Planter Boxes like EPIC Planters and Permavoid Planters.
    - On Site Biofiltration: BMP that captures and retains stormwater runoff through biological filters to remove pollutants, typically consisting of a vegetated area and gravel. This includes Planter Boxes, Rain Gardens, Green Roofs,
    - On Site Retention: BMP that captures and retains stormwater runoff through infiltration. This includes Drywells, Infiltration Trenches, Permeable Pavers with a sub-base, and Bioswales,
    - Others: BMP that are not designed to capture and retain stormwater runoff but provide incidental retention and/or improve water quality. This includes catch basins with filter inserts, downspout filters, flow based biofiltration systems, permeable pavement, permeable concrete, and permeable pavers.

Historical Data from MS4Front for BMP Types implemented by LID projects.

Historical Certificate of Occupancy Data by BMP Implemented				
Time Period	Harvest and Reuse	On Site Biofiltration	On Site Retention	Other
2002-2025	16,012	8,132	2,059	158
Total %	61	31	8	<1

APPENDIX F

Cost comparison of LID projects and municipal stormwater projects.

A comprehensive comparison on the costs for LID projects and municipal stormwater projects was not feasible as part of the report. The primary challenge was regarding the cost of LID projects as is not overseen or managed by LASAN and is completely managed by private developments through their respective contractor.

Below are key costs involved in stormwater projects. For Municipal projects, the City of Los Angeles completes the work in house with the aid of a consultant. For municipal and LID projects, these costs vary greatly based on the size of the project, location, BMP proposed, permit requirements, etc. However, for LID projects, the costs of all of these items are fully burdened by the private owner, including the operation and maintenance.

1. Initiation and Conceptualization: Defining the project scope, feasibility studies, conducting comprehensive geotechnical and environmental evaluations and land acquisition.

2. Planning and Design: Selecting design teams with portfolios relevant to the project requirements, produce value engineering for the design, develop detailed plans, blueprints, and project schedules.

3. Preconstruction: Advertise project for bidding in order to select a General contractor, obtaining permits, and setting up site logistics for the accommodation of equipment and materials.

4. Procurement: Ordering materials, hiring subcontractors, and securing necessary equipment.

5. Construction: The actual, physical building phase where the project is executed, monitored for quality, and tracked against deadlines.

6. Post-Construction: Final inspections, commissioning, handover to the owner, and ongoing maintenance.

Additionally, it is important to note that the scale of municipal projects compared to LID projects is significant. Based on Appendix D, the total Volume Mitigated by 26,506 LID projects since 2002 has been 227.9 Acre Feet. By comparison, the total Volume Mitigated by four municipal projects (Machado Lake Ecosystem Rehabilitation - Phase 2, Mar Vista Recreation Center Stormwater Capture, Westwood Neighborhood Greenway, and Echo Park Lake Rehabilitation) provide 248 Acre Feet of Volume Mitigation.

LID projects represent minimal direct cost to the City of Los Angeles because all project-related costs—including design, construction, permitting, and ongoing operation and maintenance—are borne entirely by private property owners and developers.

APPENDIX G

Fee study to evaluate the appropriate development services fees for LID plan check review to achieve full cost recovery and the necessary staffing levels to optimize the delivery of development services. The fee study should include fee recommendations for the current LID program and the revised LID program.

The Low Impact Development Ordinance Fee Study prepared by NBS Government Finance Group is provided below. The fee study determined the appropriate development service fees and staff levels based on two scenarios:

> **Scenario 1 (Previous Ordinance):** Based on the prior Ordinance No.183833 threshold of 500 square feet or more of impervious area.
>
> **Scenario 2 (Current Ordinance):** Based on the current Ordinance No. 188125 threshold of 2,500 square feet or more of impervious area.

The fee study found that under the Ordinance No. 188125 (Scenario 2), the LID Program is recovering only 59% of costs for providing development services.

Subsidy Required Without Update Fees				
Scenario	Estimated Cost	Fee Collected	Subsidized	% Recovered
Scenario 1	$4.1M	$1.7M	$2.4M	41%
Scenario 2	$1.3M	$0.8M	$0.5M	59%

The fee study also evaluated the appropriate development service fees for LID plan check and inspections services to achieve full cost recovery, including the necessary staffing levels to optimize the delivery of development services. The fee study includes fee recommendations for Scenario 1 and Scenario 2, as summarized in the table below.

Service Type		Current Fees	Proposed Fees*	
Name	Description		Previous Ordinance	Current Ordinance
Plan Check "P17"	Small residential projects (≤ 4 units)	$200.00	$459.00	----
Plan Check "P18"	Projects in Environmentally Sensitive Areas	$1,050.00 (Expedited)	$1,103.00	$1,063.00

Service Type		Current Fees	Proposed Fees*	
Name	Description		Previous Ordinance	Current Ordinance
Plan Check "P19"	Large Scale projects (developing < 50% of their lot)	$1,200.00 (Expedited)	$1,470.00	$1,417.00
Plan Check "P20"	Large Scale projects (developing ≥ 50% of their lot)	$1,500.00 (Expedited)	$1,838.00	$1,771.00
Certificate of Occupancy	Inspection	----	$294.00	$283.00

*The proposed fees eliminate the need for separate regular versus expedited plan check fees for P18, P19, and P20 projects because all projects will be reviewed faster than the current expedited plan check time. As currently 68% of projects opt to have their project reviewed as expedited, the highest rate change is less than 22.5% among P18, P19, and P20 projects; those increases are less if the current ordinance remains in place.

The recommended staffing levels for each scenario is provided below, including consultant services and overtime funding.

Classification	Current Ordinance Staffing	Current Ordinance Staffing Proposed	Previous Ordinance Staffing Proposed
Full Engineer	1	1	1
Engineer Associate III	1	1	1
Engineer Associate II	4	4	5
Consultant Services	$0	$0	$1M
Overtime	$220K	$0	$400K

NBS Government Finance Group LASAN Fee Study

APPENDIX H

Evaluation of the benefits and feasibility of consolidating the LID plan check review services into the Bureau of Engineering's Development Services and Permits Program.

LID is currently a section within LASAN's Watershed Protection Division (WPD). LID provides plan check and inspection services as part of the Los Angeles Department of Building and Safety (LADBS) Plan Check and Inspection System (PCIS). For Fiscal Year 2025-2026 LID has 6 resolution positions, down 1 from the year prior. LID staff work out of the Fig Plaza Building, 201 N. Figueroa, 90012, Marvin Braude Building, 6262 Van Nuys Blvd, 91401, and since February 2024 have staffed the LA One Stop Permitting Center in West LA.

Semiannually, LID reports compliance efforts to the *MS4 Permit Compliance* section within WPD, to compile the Annual and Semiannual Report to the Regional Water Quality Control Board who has oversight over the City's compliance with the permit. The *MS4 Permit Compliance* group is responsible for monitoring the City's compliance efforts with the MS4 Permit.

The challenges, benefits, and overall feasibility is discussed below. In short, while the proposal is feasible, LASAN recommends that this proposal be re-evaluated after the development services fees and staffing levels have been approved.

Challenges: While BOE's Development Service and Permits Program provides Plan Check review services, it does not have an inspection section. Currently all work approved by BOE's Development Service and Permits Program is inspected by the Bureau of Contract Administration (BCA). As a result, LID services would be split between two Bureaus, LID Plan Check would be completed by BOE's *Development Service and Permits Program* and LID Inspection (Certificate of Occupancy) would be completed by BCA. Should any changes occur in the field during construction, BCA would direct the customers to coordinate with BOE to re-review and re-approve the modifications as part of the Plan Check process and re-initiate the inspection process with BCA once the modifications are completed. Currently, this process would be assigned to one LID staff member; to conduct the inspection and Plan Check review simultaneously. Alternatively, BOE's Development Service and Permits Program would allow the inspection to be completed by the same staff that conduct the Plan Check review.

The adoption of the recommended revised development service fees for the LID Program along with the recommended staffing levels to provide full cost recovery, based on the fee study, will determine the number of staff necessary to transfer or employ to BOE's Development Service and Permits Program. Currently all LID staff carry an Engineer Classification similar to BOE's Development Service and Permits Program; but BCA staff carry Construction Inspector Classifications. BCA would need to onboard additional staff to aid with the additional work. Additionally, as not all LID staff may be required to transfer to BOE, LASAN would incur the cost of additional staff within WPD. Lastly, the Board of Public Works would need to designate BCA staff the authority to conduct inspections on private property.

The Bureau of Contract Administration (BCA) is responsible for inspecting construction activities of permit holders with permits issued by the Bureau of Engineering (BOE). BCA's

role is crucial in ensuring that construction projects comply with city regulations, safety standards, and permit requirements. This includes conducting site inspections and verifying materials and testing. BCAs work helps maintain the integrity of public infrastructure and ensures that projects meet legal, quality, and safety specifications. Currently, BCA oversees the inspection of all construction permits issued by the BOE and handles inspection and contract compliance functions for the Bureau of Sanitation, Bureau of Street Service, Bureau of Street Lighting and Bureau of Engineering's' construction programs

Lastly, as part of the MS4 Reporting efforts processed by *MS4 Permit Compliance,* LASAN would no longer have direct oversight into compliance efforts. *MS4 Permit Compliance* would require coordination with BOE and BCA to obtain the same metrics currently obtained within LASAN.

Benefits: The LID Plan Check clearance is currently a requirement for BOE to process their *Roof and/or site drainage to street* and at less frequency the B-Permit clearance. Consolidating the Plan Check Service will allow customers to coordinate these clearances into one Plan Check review with one department, helping to streamline the overall permitting process.

While the Plan Check Review and Inspection process would potentially be completed by BOE and BCA respectively, this setup has proven to be efficient for the customer. Incorporating LID into this process may be a challenge logistically, but customers are accustomed to scheduling these services separately. BOE and BCA have a robust number of staff to carry out this service. The proposed Certificate of Occupancy (inspection) fee proposed as part of the Fee Study presented in this document will help to offset the associated costs of additional inspections required by BCA.

Feasibility: There are various operational similarities that make this potential move feasible. LASAN Plan Check staff are currently situated at Suite 280 of Fig Plaza (201 N. Figueroa, 90015), across from BOE in Suite 290 and share Suite 351 at the Marvin Braude Building (6262 Van Nuys Blvd, 91401). LID Plan Check staff that transfer to BOE would likely be able to retain their same work locations and schedules.

Operationally, LID and BOE use many of the same programs to aid in the Plan Check review process. The Universal Cashiering Service (UCS) is used to process all Plan Check invoices. All permit clearances are done on LADBS's Plan Check and Inspection System (PCIS). All customer inquiries and general questions are responded to via the Customer Service Require (CSR) system. The two programs that are unique to LID, LID Portal and MS4Front, are expected to be migrated to CSR or Build LA by February 2026 and the end of 2026, respectively. Additionally, the revised LID Handbook will be housed in BOE's Database for Technical Procedures for Building & Safety Clearances. This database consolidates all technical procedures from the various departments that take part in the development services processes; eliminating the need for applications to visit various Department websites individually. Upon adoption of the Handbook, all other LID relevant documents will be migrated to this Database.

The continuation of the physical and digital location of LID resources will allow for a seamless

transition for applicants. The consolidation of LID resources into BOE's Database will lessen the burden on applicants having to visit multiple departments. The long term benefits of transitioning LID to BOE is the streamlining and consolidation of two Plan Check Clearances: ***Low Impact Development*** and ***Roof and/or site drainage to street***. This increased support network of Plan Check staff that would be available to LID under BOE, through their rotation program, would allow for the adoption of potential changes to the MS4 Permit without resulting in an increase to the backlog of projects.

APPENDIX I

Status of all plan check improvements as needed to improve customer service and delivery and wait time, including the development of standard plans for Accessory Dwelling Units.

Completed and Planned Improvements

The LID Program uses three main programs to process all Building and Permitting Applications: LID Portal, MS4Front, and BuildLA. LID's continued involvement in the integration of BuildLA Permitting System has resulted in the following:

- Adoption of the Universal Cashiering System (UCS) to process all invoices.
- Adoption of the BuildLA Appointment System to schedule Virtual and In-Person appointments.
- Adoption of the Customer Service Request (CSR) to provide and respond to customer inquiries and questions.

Additionally, planned enhancements that are set to be completed or initiated in 2026 include:

- Same day virtual appointments will be feasible by February 2026, mimicking the functions of the Virtual Counter without the applicant needing to wait for their place in line to be called.
- Migration of the LID Portal, a program used by LASAN that provides applicants the opportunity to submit their building permitting applications electronically, into CSR by the end of February 2026. This will consolidate the systems that applicants need to navigate through and is a system that most customers are used to as it is used by the Bureau of Engineering, Bureau of Street Services, Department of City Planning, and LASAN to process general questions, inquiries, or requests.
- Currently over 1,000 projects that have not responded to LID in over 18 months are being removed from the LID Portal while saving records internally on MS4Front in case the applicant returns for processing.
- Migration of MS4Front, a program used by LASAN to archive the data and project files for approved projects, to be completed by the end of 2026. MS4Front currently requires manual inputs from the LID Portal, resulting in the need for QA/QC; the intent is to allow for this archiving to be done automatically, helping to reduce staff time processing clerical aspects of the permitting process.
- A thorough review of the MS4Front database is currently underway to ensure that each project profile with clerical errors or omissions is corrected including but not limited to: impervious area, volume mitigated, project address, zip code, clearance date, etc.
- Complete digitization of all hard copy documents in LID's database which consists of the items listed below. This will aid in expediting the completion of Public Records requests made by the general public. Additionally, this will alleviate the costs associated with the storage of hard copy records.
    - ~1,000 Construction Plans
    - ~77,000 Covenant and Agreement Documents
    - ~38,000 Stormwater Observation Reports

Lastly, as shown in Appendix B of this Report, the review duration and backlog have decreased significantly since the adoption of LID Ordinance 188125. As LID continues to transition to LID Ordinance 188125, review duration and backlog are expected to continue to decrease.

Accessory Dwelling Unit (ADU) Improvements

For the review of Accessory Dwelling Units (ADUs), there are two scenarios under which the applicable LID Ordinance Requirements would differ, as outlined below. Scenario 1 assumes LID requirements based on the prior Ordinance No.183833 threshold of 500 square feet or more of impervious area. Scenario 2 assumes the current Ordinance No. 188125 threshold of 2,500 square feet or more of impervious area. Under these scenarios, LID Ordinance requirements would differ.

Scenario 1 (Previous Ordinance): Under scenario 1, the vast majority of ADU projects would require LID. To further streamline the review of these projects, LID proposes to provide pre-selected and pre-sized BMP options for all projects that propose between 500 to 1,499 SF and 1,500 SF to 2,499 SF of impervious areas, as detailed in the tables below. This proposal relieves the applicant of having to size their own BMP; which often resulted in multiple plan check reviews. However, applicants may continue to size their own BMP if they select a BMP outside of those prescribed below. There are very limited scenarios where an ADU project would not be eligible for this streamlined option, all of which would involve the ADU being part of a larger project that proposes more than 2,500 SF of impervious area.

New and Redevelopment Projects Proposed 500 to 1,499 SF of Impervious Area	
BMP Type	BMP Size and Requirements
Harvest and Reuse	Four (4) - 55 Gallon **Rain Barrels**, one (1)-15 Gallon **Shade Tree**, and minimum of 100 SF of **Landscaping**
On Site Biofiltration	One (1) - 32 square foot **Planter Box**
On Site Retention	80 square feet of **Permeable Pavers** with a 2ft subbase
Others	Must be sized using a 0.75” storm event.

New and Redevelopment Projects Proposed 1,500 to 2,499 SF of Impervious Area	
BMP Type	BMP Size and Requirements
Harvest and Reuse	840 Gallon **Rain Tanks or Cistern** and minimum of 280 SF of **Landscaping**
On Site Biofiltration	One (1) - 100 square foot **Planter Box**

On Site Retention	140 square feet of **Permeable Pavers** with a 2ft subbase
Others	Must be sized using a 0.75” storm event.

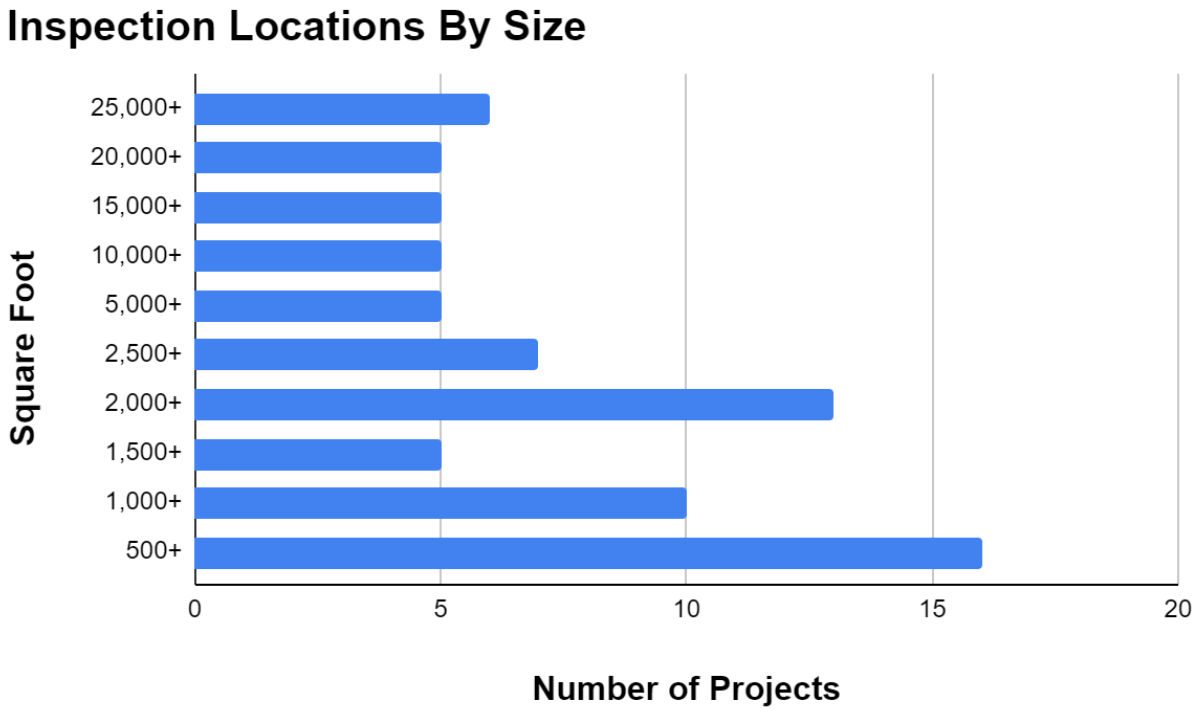
For projects that propose more than 2,500 SF of impervious areas, they will be required to adhere to current requirements of the MS4 Permit for Priority Development projects. This includes the treatment of all impervious areas using the 85th Percentile storm event. As a result of Item J of this report, LID would no longer allow above grade Harvest and Reuse BMP’s, as they are often removed.

Scenario 2 (Current Ordinance): Under the current LID Ordinance No. 188125, the vast majority of ADUs no longer require LID. There are very limited scenarios where an ADU project would be subject to LID, all of which would involve the ADU being part of a larger project. However, as shown in Appendix B, the review duration and backlog have decreased significantly since the adoption of LID Ordinance 188125. As LID continues to transition to LID Ordinance 188125, review duration and backlog are expected to continue to decrease.

APPENDIX J

Results of a survey of installed LID infrastructure on a sampling of properties to under 25,000 square feet to determine the degree to which compliance continues one year after a permit is issued.

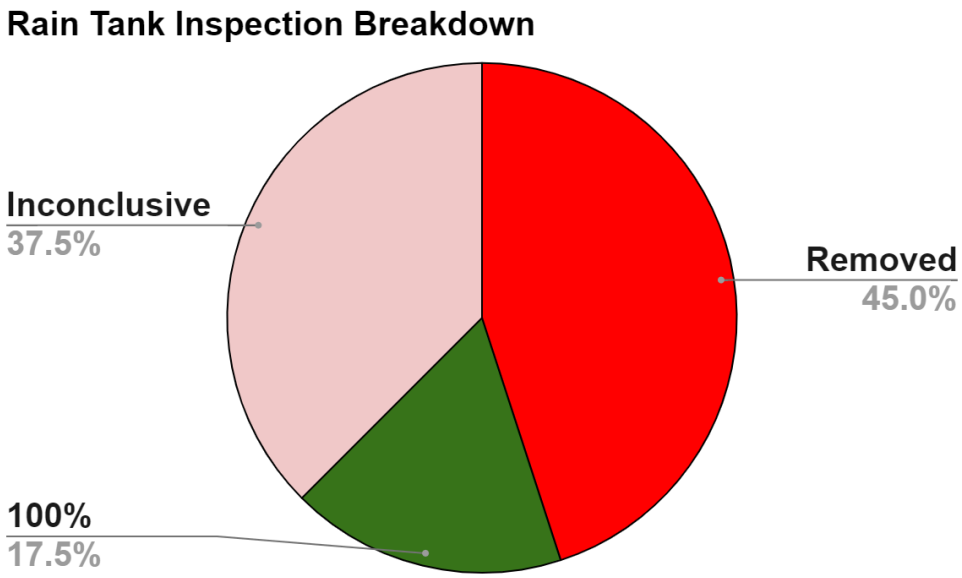
LID staff conducted field inspections on 77 projects that were previously issued their Certificate of Occupancy clearance, as shown in the map at the end of this Appendix. As shown below, the project sites selected were those under 25,000 SF of impervious areas, with additional inspections being performed for projects under 2,500 SF, as the majority of projects approved by LID are under 2,500 SF.



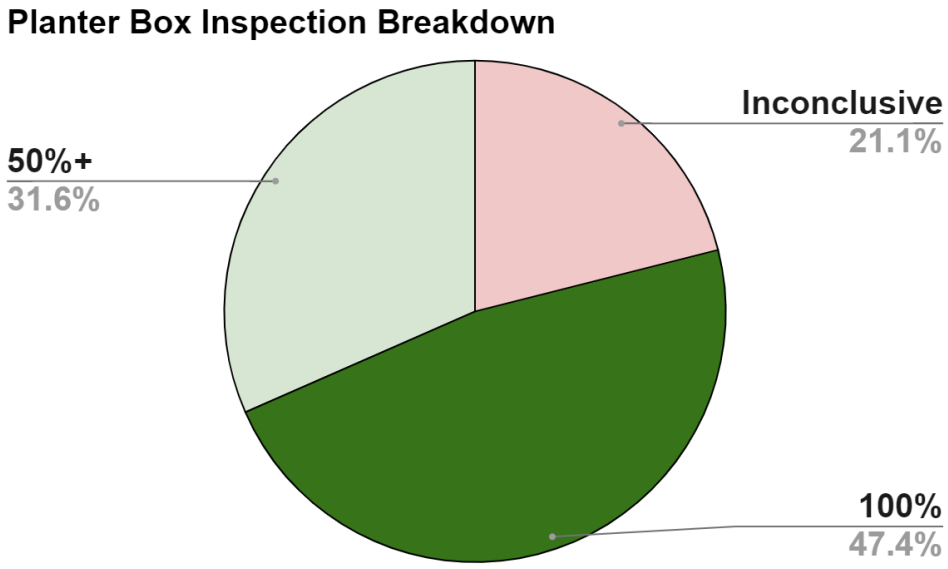
The project sites selected cover all of the primary BMPs approved by LID; Harvest and Reuse, On Site Biofiltration, and On Site Retention. The map at the end of Appendix J highlights the location of each project site, each Council District was represented in these inspections.

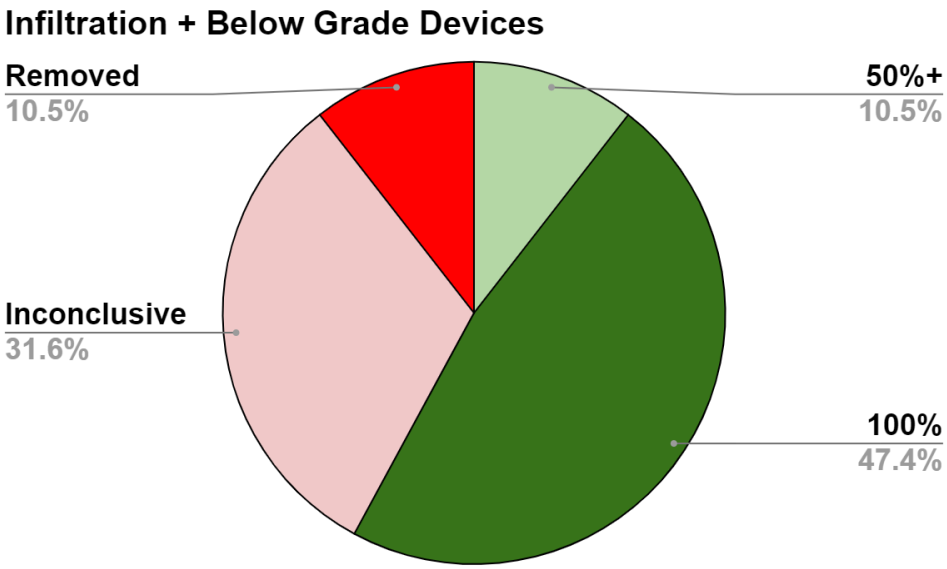
The overall inspection results noted that 22% of BMP's approved were removed, although that is primarily projects approved for rain tanks. Unfortunately, as the current LID Ordinance does not grant LID staff access into private property for follow up inspections, the inspections were completed from the public right of way or with access to the property by the owner or property manager. As a result, 31% of the sites visited were inaccessible and our inspection was deemed inconclusive. 47% of properties were found to be in compliance.

Taking a deeper look into the inspections, rain tanks were the primary BMP that was found to be removed. In inspections where rain tanks were the primary BMP, they were removed 45% of the time and were only in compliance in 18% of the inspections.



Other BMPs, like Planter Boxes, which are above grade, or Infiltration Trenches, Drywells, or Cisterns which are below grade BMP's were often not removed. The rare instance where a below grade where a below grade BMP was removed, was in the case of rain gardens.

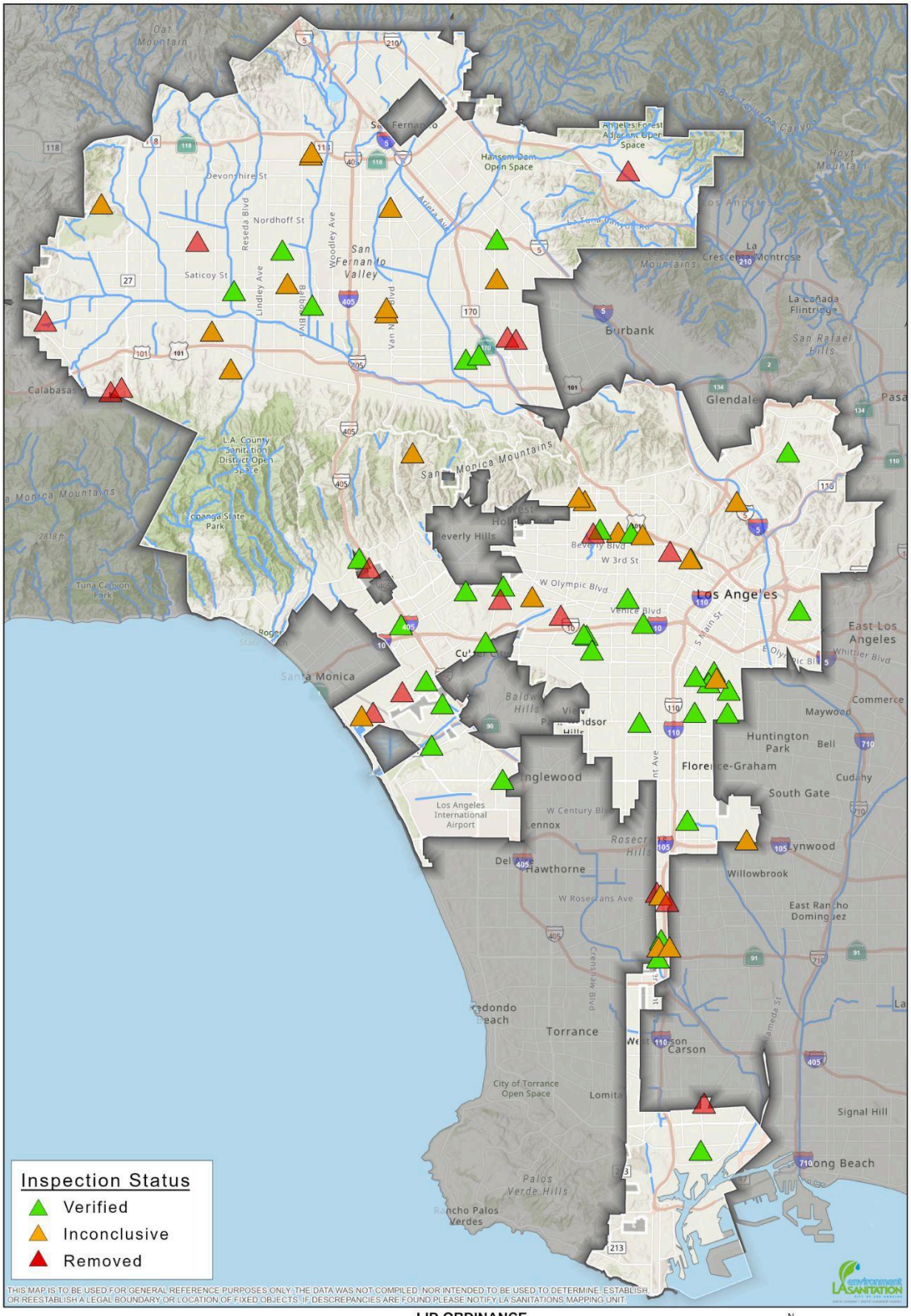




As a result of these inspections, it is evident that a need for continuous inspections of approved LID infrastructure is necessary to ensure they remain in compliance. In various cases, rain tanks are rented for the purpose of demonstrating compliance during inspection, only to be removed after the inspection has been passed. While our recommendation as part of Item I continues to propose rain barrels, LID found that rain barrels (typically 55-110 gallons) are more than twice as likely than rain tanks (typically 130+ gallons) to be verified during inspections and less likely to be removed. This is in part because they are considered less of an eyesore, are a more cost effective option to meeting LID requirements, and are less likely to be rented.

An additional recommendation to ease the ability to conduct this level of inspection is for the Board of Public Works to designate LASAN as its representative to conduct LID inspections on private property. Per Ordinance 173494, *the Board of Public Works or its representatives are hereby authorized to enter such property at any reasonable time to inspect for compliance with best management practices*. A formal designation would allow LID to more effectively conduct the level of inspections necessary to enforce compliance. Should LID inspections be moved to BOE or BCA, a recommendation to designate BOE or BCA as its representative to conduct LID inspections on private property is recommended.

Furthermore, when a property is found to be out of compliance, inspectors should be granted the authority to issue citations to deter properties from removing the approved BMPs.


Inspection Status
Verified
Inconclusive
Removed
THIS MAP IS TO BE USED FOR GENERAL REFERENCE PURPOSES ONLY. THE DATA WAS NOT COMPILED NOR INTENDED TO BE USED TO DETERMINE, ESTABLISH, OR REESTABLISH A LEGAL BOUNDARY OR LOCATION OF FIXED OBJECTS. IF DESCREPANCIES ARE FOUND PLEASE NOTIFY LA SANITATIONS MAPPING UNIT.
Oat Mountain
San Fernando
Angeles Forest Adjacent Open Space
Hansen Dam Open Space
Devonshire St
Nordhoff St
Reseda Blvd
Woodley Ave
San Fernando Valley
Saticoy St
Lindley Ave
Balboa Blvd
Van Nuys Blvd
Aliso Canyon
Los Angeles
La Crescenta-Montrose
Mountains
La Cañada Flintridge
Burbank
San Rafael Hills
Glendale
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Beverly Blvd
W 3rd St
W Olympic Blvd
Venice Blvd
Los Angeles
East Los Angeles
Whittier Blvd
Tuna Canyon Park
Santa Monica
Baldwin Hills
Commerce
Maywood
Huntington Park
Bell
Florence-Graham
Cudahy
South Gate
Inglewood
Los Angeles International Airport
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Lennox
Lynwood
Hawthorne
Willowbrook
W Rosecrans Ave
East Rancho Dominguez
Redondo Beach
Torrance
West Carson
Carson
City of Torrance Open Space
Lomita
Signal Hill
Long Beach
Palos Verde Hills
Rancho Palos Verdes
LID ORDINANCE
Survey of Installed LID Infrastructure
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DATE CREATED: 2-11-25
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DATE REVISED:
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