

Central Coast Regional Water Quality Control Board

June 18, 2013

Mr. Fred Meurer
City of Monterey
580 Pacific Street
Room 7
Monterey, CA 93940
Email: meurer@ci.monterey.ca.us

VIA ELECTRONIC AND CERTIFIED MAIL
Certified Mail No. 7008 1140 0003 4708 6250

CENTRAL COAST WATER BOARD NOTICE OF VIOLATION BASED ON RESULTS OF LIMITED COMPLIANCE AUDIT, CITY OF MONTEREY STORM WATER MANAGEMENT PROGRAM, WDID NO. 3 27MS03012, MONTEREY COUNTY

Dear Mr. Meurer:

On March 8, 2013 and April 10, 2013, Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff conducted a partial compliance audit of the City of Monterey's (Monterey) Municipal Separate Storm Sewer System (MS4) program. Central Coast Water Board staff verbally reviewed with Monterey staff the preliminary findings of the audit and this Notice of Violation (NOV) on March 8, 2013 and June 13, 2013, respectively. This letter formalizes the audit findings and describes the next steps.

1. Introduction

Monterey is a co-permittee along with seven other participating entities in the Monterey Regional Stormwater Permit Participants Group (Monterey Regional) enrolled in National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004, *Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems* (Municipal General Permit). The Municipal General Permit in effect through June 30, 2013 is Water Quality Order No. 2003-0005-DWQ. On July 1, 2013, Water Quality Order No. 2013-0001-DWQ becomes the effective Municipal General Permit.

Central Coast Water Board staff previously conducted two audits of Monterey's stormwater program. In May of 2009, Central Coast Water Board staff reviewed the Construction Site Management and Pollution Prevention/Good Housekeeping program elements of each of the Monterey Regional participating entities (May 2009 audit). In September of 2009, an audit team comprised of Central Coast Water Board staff, USEPA staff and PG Environmental (USEPA contractor) reviewed the following Monterey program elements (September 2009 audit):

- Illicit Discharge Detection and Elimination;
- Construction Site Management;
- Post-Construction Stormwater Management in New Development and Redevelopment; and
- Pollution Prevention/Good Housekeeping.

Central Coast Water Board staff issued an NOV to each of the Monterey Regional participating entities on September 14, 2009 (September 2009 NOV) based on the findings of the May 2009 audit and review of the Monterey Regional 2007/2008 Annual Report. On May 10, 2010, Central Coast Water Board staff issued a second NOV (May 2010 NOV) to each of the Monterey Regional participating entities for violations contained in the September 2009 NOV that had not been corrected. In addition, Central Coast Water Board staff issued a NOV to Monterey on April 13, 2010 (April 2010 NOV) based on the findings of the September 2009 audit.

The primary purpose of the 2013 audit was to assess Monterey's status of compliance with the findings of the 2009 audits and subsequent NOV's. The audit focused primarily on the evaluation of Monterey's compliance with the Construction Site Management, Municipal Operations, and Post-Construction Stormwater Management program elements. Central Coast Water Board staff did not evaluate all components of each program element. Therefore, Monterey should not consider this letter as a comprehensive evaluation of these program elements.

Section 40 of the Code of Federal Regulation (40 CFR 122.41[i]) and Municipal General Permit Section H.10 provides the authority to conduct the audit. Central Coast Water Board staff reviewed documents, interviewed Monterey staff and visited several sites. On March 8, 2013 Central Coast Water Board staff conducted in-person interviews and site visits. On April 10, 2013, Central Coast Water Board staff held a conference call with Monterey staff. The Monterey area received 0.23 inches of precipitation the day before the in-person component of the audit (March 7, 2013) and 0.14 inches of precipitation the day of the in-person component of the audit (March 8, 2013).¹

The primary representatives involved in the audit were the following:

Monterey	Tom Reeves, City Engineer
Representatives:	Tricia Wotan, Associate Planner
	Scott Pryor, Marine Operations Supervisor
	Michael McCarthy, Assistant City Manager
	Hans Uslar, Deputy City Manager, Plans & Public Works
	Chip Rerig, Chief of Planning, Engineering & Env. Compliance
	Bret Johnson, Street and Utility Manager
	John Kuehl, Building Official
	Perry Tarsitano, Parks
	Robert Harary, Principal Engineer/Capital Projects
	Fred Maurer, City Manager
	Wayne Dalton, Parking Superintendent
	Kim Bui-Burton, Community Services Director
	Norm Green, Associate Engineering Surveyor
	Kevin Anderson, Environmental Regulations Analyst/Inspector
	Joe Headley, Building Plans Examiner/Inspector
	Rodger Rauch, Waterfront Maintenance Supervisor
	Paul Abadilla, Building Inspector
	Louie Marcuzzo, Parks Operation Manager
	Paul Dossche, Senior Park Maintenance Worker

¹ National Weather Service Data for the Monterey Airport, <http://www.nws.noaa.gov/climate/index.php?wfo=mtr>

Central Coast Water Board Representatives: Jennifer Epp
Julia Dyer

2. Program Evaluation Results

Central Coast Water Board staff has grouped the audit findings into the following categories:

- Violations - Areas where Monterey was out of compliance with the Municipal General Permit requirements;
- Program Deficiencies - Areas where Monterey's program needs improvement to achieve the Maximum Extent Practicable (MEP) standard;
- Recommendations – Suggestions to improve Monterey's program; and
- Positive Attributes – Components of Monterey's program that indicate Monterey's overall progress in implementing the Program.

Each violation and deficiency is identified with a "comment reference number" shown in a box to the right of the finding for ease of future reference and discussion or response.

2.1 Evaluation of Construction Site Management

Central Coast Water Board staff accompanied Monterey inspection staff to three private active construction sites to assess compliance with the Construction Site Management program element of the Municipal General Permit. Following is a summary of the audit findings for this program element.

2.1.1 Private Construction Site Inspection

Private Construction Site Disturbing Greater than an Acre

Central Coast Water Board staff visited the Santa Catalina School at 1500 Mark Thomas Drive during the audit with Monterey inspection staff. At the time of the audit, this was the only active construction site under Monterey jurisdiction disturbing greater than an acre. This is a private school construction project enrolled in the Construction General Permit (WDID 327C363523). Jennifer Epp (Central Coast Water Board) visited the site with Kevin Anderson (Monterey Inspector), Paul Abadilla (Monterey Inspector), John Kuehl (Monterey Building Official), and Tricia Wotan (Monterey Planner).

Positive Attributes

The Monterey Inspector demonstrated knowledge of appropriate construction site stormwater BMPs and inspection procedures during the site visit.

Private Construction Sites Disturbing Less than an Acre

The majority of lots within Monterey's Municipal General Permit coverage area are developed. Most construction projects in Monterey are small (disturb less than an acre). Therefore, construction oversight of small projects is an important component of water quality protection in Monterey. Central Coast Water Board staff visited the following construction sites during the audit with Monterey inspection staff. Each site was under active construction during the audit:

- 2100 Del Monte Ave. This is a commercial construction project that is not enrolled in the Construction General Permit. Julia Dyer (Central Coast Water Board) visited the site with Joe Headley (Monterey Inspector) and Tom Reeves (Monterey City Engineer).
- 400 Tyler Street. This is a commercial construction project that is not enrolled in the Construction General Permit. Julia Dyer (Central Coast Water Board) visited the site with Joe Headley (Monterey Inspector) and Tom Reeves (Monterey City Engineer).

Comment Reference Numbers

Violation of Municipal General Permit Section D.1 for failure to implement Monterey Regional SWMP BMP 4-3.b, which requires Monterey inspection staff to implement procedures for enforcement of BMP control measures.

1

Municipal General Permit Section D.1 requires Monterey to implement the Monterey Regional Stormwater Management Plan (SWMP). Monterey Regional SWMP BMP 4-1.a requires Monterey to develop “requirements for construction site operators to: implement appropriate sediment and erosion control BMPs; to control waste that may cause adverse impacts to water quality such as discarded building materials, concrete truck washout, paint and plastering wash down, chemicals, litter, and sanitary waste at the construction site.” Monterey Regional SWMP BMP 4-3.b requires Monterey to implement procedures for “enforcement of BMP control measures.”

During the audit, Central Coast Water Board staff observed exposed construction materials, waste, and debris located where stormwater could carry pollutants into the storm drain. Precipitation in Monterey occurred both the day before and the day of the audit. See Photos # 1 and # 2 taken at 400 Tyler Street in Appendix A. Central Coast Water Board staff also observed an ineffective BMP for storm drain inlet protection. The fabric under the storm drain grate contained a large hole and a ring was visible around the inlet that indicated a pool of polluted water may have collected around the storm drain inlet. See Photo #3 taken at 2100 Del Monte Avenue in Appendix A. The Monterey Inspector did not identify the inadequate BMPs and did not demonstrate the willingness to require the contractor to correct the observed deficiencies. This violation is an ongoing issue and is similar to a deficiency observed during the September 2009 audit (see comment # 1 in the April 2010 NOV).

Action: Monterey’s must improve its construction oversight to include enforcement of effective minimum BMP control measures, so that construction sites within the city comply with the Monterey Regional SWMP minimum construction site BMPs.

Violation of Municipal General Permit Section D.1 for failure to implement Monterey Regional SWMP BMP 4-3.b, which requires Monterey inspection staff to use procedures and checklists during inspections.

2

Municipal General Permit Section D.1 requires Monterey to implement the Monterey Regional SWMP. The Monterey Regional SWMP BMP 4-3.b requires Monterey to inspect sites less than an acre and document the inspection using a form similar to the Monterey Regional SWMP *Site Inspection Report for Sites Less Than One Acre*. Monterey Regional SWMP BMP 4-3.b also requires Monterey to take appropriate action to have any observed violations corrected. Monterey staff stated they don’t perform specific stormwater inspections for small projects but instead incorporate stormwater review into other inspections. During the audit, the Monterey inspection staff did not demonstrate the use of a form similar to the Monterey Regional SWMP Site Inspection Report. The inspection reports used for small projects did not contain stormwater specific inspection information. Inspection staff stated they typically would rely on memory. Inspection staff stated they typically would not document observed violations and would not document the need to follow up with the site to verify violations had been corrected.

Relying on memory for corrective action leaves the stormwater program vulnerable to loss of institutional memory during staff turn-over, isolation of the inspection team members, the inability to track chronic violators, and weakened enforcement due to the inability to cite previous infractions. This violation is an ongoing issue and is similar to a deficiency observed during the September 2009 audit (see comment # 3 in the April 2010 NOV).

Action: Monterey must update its inspections procedures to include follow-up actions, inspection documentation (including tracking of inspections and follow-up actions), and enforcement of violations (corrective actions including escalating enforcement, if necessary).

Deficiency: Monterey staff didn't demonstrate the level of knowledge and awareness required to inspect small construction projects effectively.

The Monterey Inspector did not identify inadequate BMPs or demonstrate an awareness that he should document and correct the site's deficient BMPs.

3

Action: Monterey must provide effective training to applicable Monterey staff to ensure construction site inspectors have the skills necessary to effectively identify and correct inadequate construction BMP implementation. Monterey must identify what knowledge is required for the inspectors, determine the knowledge gaps that exist, and implement actions that result in filling the gaps.

Deficiency: Monterey's inspection form for construction sites less than one acre does not contain a complete list of minimum BMPs.

The Monterey Regional SWMP *Site Inspection Report for Sites Less Than One Acre* is missing some of the minimum BMPs contained in the Monterey Regional SWMP Guidance Series for Construction sites. For example, general site, materials management, and roadwork BMPs are not covered in the inspection report.

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Action: Monterey must utilize an inspection report for sites less than one acre that, at a minimum, covers the minimum BMPs described in the Monterey Regional SWMP BMP Guidance Series.

General Comments for Private Construction Sites of all Size

Recommendation: Monterey should periodically conduct inspections without pre-notification of the project site.

Monterey staff stated they do not conduct un-announced inspections. Monterey should periodically conduct inspections without notifying the site ahead of time. This likely will result in a more realistic assessment of the typical condition of the site. Sites are also more likely to remain in compliance on a daily basis when they know they could be subject to an un-announced inspection.

Recommendation: Monterey should keep their construction project stormwater watch list up-to-date.

Monterey staff stated that they use a construction project watch list to track sites needing stormwater oversight. This can be an effective tool for construction project oversight, however the list produced during the audit was out-of-date. Monterey should keep the construction project stormwater watch list up-to-date.

2.1.2 Construction Site Plan Review

Project records reviewed by Central Coast Water Board staff indicate that Monterey is conducting and documenting site plan reviews.

2.2 Evaluation of Pollution Prevention\Good Housekeeping

Central Coast Water Board staff visited the following municipal sites during the audit with Monterey staff:

- Ryan Ranch Corporation Yard. This is a municipal facility housing equipment, materials, and staff for Parks & Forestry, Fleet Maintenance, and Streets & Sewers that was also visited during the September 2009 audit. Jennifer Epp (Central Coast Water Board) visited the site with Louie Marcuzzo (Monterey Parks Operation Manager), Bret Johnson (Monterey Street and Utility Manager), Perry Tarsitano (Monterey Parks), Kevin Anderson (Monterey Inspector), and Tricia Wotan (Monterey Planner).
- Cemetery Corporation Yard. This is a municipal facility that was also visited during the September 2009 audit. Julia Dyer (Central Coast Water Board) visited the site with Tom Reeves (Monterey City Engineer) and Paul Dossche (Senior Park Maintenance Worker).
- Monterey Sports Center and Pool. This is a municipal facility. Julia Dyer (Central Coast Water Board) visited the site with Tom Reeves (Monterey City Engineer).
- Wharf II. Jennifer Epp (Central Coast Water Board) visited the site with Scott Pryor (Monterey Marine Operations Supervisor), Rodger Rauch (Monterey Waterfront Maintenance Supervisor), Kevin Anderson (Monterey Inspector), John Kuehl (Monterey Building Official), and Tricia Wotan (Monterey Planner).

Positive Attributes

Central Coast Water Board staff observed the following positive attributes of the Monterey stormwater program during the audit:

- Monterey staff at the Cemetery Corporation Yard demonstrated awareness of spill response procedures;
- Monterey staff at the Wharf II demonstrated awareness of the water quality risks and appropriate BMPs for conducting construction over water;
- The Ryan Ranch Corporation Yard demonstrated improvement in inlet protection and source control BMPs since the September 2009 audit; and
- Monterey staff awareness of pesticide application procedures to prevent application when rain is predicted had improved since the May 2009 audit.

Deficiency: Source control at the Monterey Sports Center Pool.

Central Coast Water Board staff observed a large drum of restroom cleaner stored such that it was a potential source of pollutants to be transported to the Monterey storm drain system. See Photo # 4 taken at Monterey Sports Center Pool in Appendix A.

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Action: Monterey must implement effective procedures for proper material storage at municipal facilities.

Recommendation: Materials management at Ryan Ranch Corporation Yard and Cemetery Corporation Yard.

Central Coast Water Board staff observed wattles or sandbags used to prevent migration of stockpiled materials. Typically wattles and sandbags placed on hard surfaces are not effective in preventing the migration of stockpiled materials. Monterey should monitor the effectiveness of these BMPs during storm events and implement more effective BMPs if necessary. See Photo # 5 taken at Ryan Ranch Corporation Yard in Appendix A.

2.3 Post-Construction Requirements

Monterey Regional SWMP (BMP 5-7.e) requires Monterey to apply interim Low Impact Development principles and features to all new and redevelopment projects as of January 1, 2011. Monterey Regional SWMP BMP 5-7.f requires Monterey to develop and maintain an interim Low Impact Development application review tracking report. Monterey staff stated that six projects have triggered the requirements since January 1, 2011.

Positive Attribute

Central Coast Water Board Staff observed the following positive attributes of the Monterey stormwater program during the audit:

- Monterey has been utilizing a Low Impact Development Worksheet and Implementation Tracking form for projects since January 1, 2011; and
- In early 2013, Monterey added a “Counter Checklist” questionnaire that identifies the project’s impervious surfaces and the project type to assist with identification and tracking of the applicable stormwater requirements.

2.4 Other Observations

Positive Attributes

Central Coast Water Board Staff notes the following positive attributes of the Monterey stormwater program:

- Monterey staff stated that they have the ability to issue fines up to \$500 for violations of the stormwater ordinance and have used this as an effective compliance tool, including providing the opportunity for violators to attend an educational class in lieu of paying the fine; and
- Monterey’s active participation in Monterey Regional management activities is beneficial for effective collaboration and program efficiencies within the Monterey Regional group.

Violation of Municipal General Permit Section H.9 for Failure to comply with the April 2010 NOV required actions.

The April 2010 NOV required Monterey to maintain specific documentation of all actions implemented in response to each violation contained in the NOV and each recommendation contained in the USEPA Audit Report. This documentation was required for Central Coast Water Board staff to assess Monterey’s compliance with the Municipal General Permit. The NOV required Monterey to document its reasoning if it elects not to address any of the recommendations and required the records to make reference to the Audit Report and the NOV. Monterey has records of actions implemented for the violations contained in the NOV and has records of actions implemented for some of the recommendations contained in the Audit Report. Monterey staff was unable to provide Central Coast Water Board staff with documentation specifying which recommendations Monterey elected not to address and the reasoning for not addressing the recommendation. This failure to comply with the required actions of the April 2010 NOV is a violation of Municipal General Permit Section H.9.

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Action: Monterey must provide a report that responds to each of the comments (all comments shown underlined or in italics) contained in the USEPA Audit Report dated February 3, 2010. The response must reference each comment individually and specify if Monterey elected not to address the comment. For comments Monterey did not address, the response must contain Monterey’s reasoning. For comment Monterey did address, the response must provide a

summary of the actions taken by Monterey as a result of the comment. For comments where Monterey has existing documentation, the report shall compile (not reference) that information.

Deficiency: Illicit Discharge Detection and Elimination.

During the audit visits to private construction sites, Julia Dyer (Central Coast Water Board), Joe Headley (Monterey Inspector), and Tom Reeves (Monterey City Engineer) observed an auto repair facility (Stahl Motors located at 498 Fremont Street) that was cleaning a vehicle in a location such that the wash water drained to the street. See Photo # 6 taken at 498 Fremont Street in Appendix A. The Monterey inspector appeared reluctant to identify the activity as an illicit discharge, to correct the issue, and to follow up on the issue. Monterey inspection staff is either inadequately trained or unwilling to recognize and correct illicit discharges and threats to water quality.

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Action: Monterey must implement actions to ensure applicable staff (including inspectors) are trained to identify, correct and follow up on potential illicit discharges as part of their typical work activities.

Deficiency: Monterey does not ensure appropriate jurisdictional determinations are conducted to determine which bodies of water (including channels) in Monterey are waters of the United States.

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The letter to Monterey from USEPA (attached to the April 2010 NOV) stated that excavation work observed during the September 2009 audit may have resulted in increased discharge of sediment to the Monterey Bay. USEPA suggested Monterey contact the US Army Corps of Engineers to determine if past or future excavation work requires a Section 404 permit and an associated Section 401 Water Quality Certification. Monterey staff stated during the 2013 audit that they have not contacted the US Army Corps of Engineers. Monterey staff did verify that two of their previous projects had received the appropriate regulatory approvals. Monterey staff stated they are currently using their judgment to decide if a water body is a water of the United States. In addition, Monterey began the 2013 maintenance work at Wharf II before they had received a Section 401 Water Quality Certification.

Action: Before performing any additional excavation activities in water bodies (including channels), Monterey must undertake appropriate jurisdictional determination procedures to determine if the subject waters are waters of the United States. Monterey should also perform a jurisdictional determination of areas where past excavation activities occurred without a Section 404 permit and Section 401 Water Quality Certification. Monterey must provide education to appropriate staff on what activities may trigger Section 404 and Section 401 requirements. Monterey must ensure that maintenance projects that trigger Section 404 and Section 401 requirements do not begin until the Section 404 permit and the Section 401 water quality certification have been obtained.

Deficiency: Trash management

Central Coast Water Board staff observed inadequate trash management in several locations during the audit:

- Ryan Ranch Corporation Yard - Visible trash at the Ryan Ranch Corporation Yard in the area around a large uncovered trash bin indicated trash was migrating out of the container. See Photo # 7 taken at Ryan Ranch Corporation Yard in Appendix A.
- Monterey Wharf II - Open bins at the Monterey Wharf II were being used for trash collection and storage. The bins were uncovered and some of the bins were not water-tight (contained holes or gaps), creating the potential for wind or stormwater to transport

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pollutants to the ocean below. All trash at the wharf should be kept in closed, water-tight containers. In addition, cigarette butts were observed on the wharf. Monterey should provide convenient disposal for cigarette butts to encourage their proper disposal. See Photos # 8 and # 9 taken at Monterey Wharf II in Appendix A

- Steinbeck Plaza - An uncovered trash can in the Steinbeck Plaza area is located adjacent to a nearby beach. See Photo # 10 in taken at the Steinbeck Plaza in Appendix A. This is an ongoing issue. The same trash can was observed to be uncovered during the September 2009 audit (see comment # 112 in the May 2010 NOV).

Action: Monterey must evaluate trash management practices in Monterey and implement actions to prevent trash from becoming a source of stormwater pollution. Monterey must develop and implement trash management improvements at the Ryan Ranch Corporation Yard and at Wharf II. Monterey should require all trash receptacles in Monterey to be covered, with receptacles located near bodies of water to be the highest priority.

3. Conclusion

Monterey must correct program violations as soon as possible. By August 26, 2013, Monterey must provide a report (referencing each comment reference number) that explains how and when Monterey corrected the violations identified in this letter. **Monterey must update its program to correct all deficiencies and report on the correction of each deficiency as an attachment to the 2012-2013 Annual Report** (referencing each comment reference number). Central Coast Water Board staff will conduct a follow-up audit to assess the progress of Monterey in correcting all program violations and deficiencies. Monterey must keep detailed records of actions taken to correct violations and deficiencies, and the results of these actions, to demonstrate that the violations and deficiencies have been corrected.

Central Coast Water Board staff requires Monterey to submit information in response to this letter pursuant to Municipal General Permit Section H.9 and the 2013 Municipal General Permit (revised Municipal General Permit effective as of July 1, 2013 per Order No. 2013-001-DWQ), Attachment F, Section 9. Central Coast Water Board staff requires Monterey to submit their 2012-2013 Annual Report by **November 15, 2013** pursuant to 2013 Municipal General Permit, Section E.1 and Attachment F, Section 9.

In accordance with California Water Code section 13385(a), Monterey's violation of the Permit subjects it to civil liability. Pursuant to Water Code section 13385(c), the Central Coast Water Board may impose civil liability for up to \$10,000 per day for each violation. If the Central Coast Water Board elects to refer the matter to the Attorney General, the superior court may impose civil liability for up to \$25,000 per day for each violation (Water Code 13385(b)). Central Coast Water Board staff's recommendations for further enforcement will depend on Monterey's response to this Notice of Violation. The Central Coast Water Board reserves its right to take any enforcement action authorized by law.

Central Coast Water Board staff did not examine all aspects of Monterey's stormwater program implementation. Therefore, Monterey should not consider the positive attributes, violations, and deficiencies noted in this letter to be a comprehensive evaluation of Monterey stormwater program. Central Coast Water Board staff may choose to conduct a more complete review of Monterey's stormwater program or an additional audit focusing on different program elements in the future.

Central Coast Water Board staff is available to work with Monterey to achieve a program which complies with the Municipal General Permit and is increasingly effective at reducing the discharge of pollutants to the maximum extent practicable and protecting water quality.

If you have any questions regarding this letter, please contact **Jennifer Epp** at (805) 594-6181 or at jepp@waterboards.ca.gov, or Phillip Hammer at (805) 549-3882.

Sincerely,

Michael Thomas

Digitally signed by Michael Thomas
DN: cn=Michael Thomas, o=Central Coast Regional Water Quality
Control Board, ou=Region 3,
email=mthomas@waterboards.ca.gov, c=US
Date: 2013.06.18 11:23:10 -07'00'

Michael J. Thomas
Assistant Executive Officer

Attachment A - Photos taken by Central Coast Water Board staff on March 8, 2013

cc:

Tom Reeves, City of Monterey Engineer (reeves@ci.monterey.ca.us)
Tricia Wotan, City of Monterey Associate Planner (wotan@ci.monterey.ca.us)
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ATTACHMENT A – PHOTOS TAKEN DURING MARCH 8, 2013 AUDIT



Photo 1. 400 Tyler Street



Photo 2. 400 Tyler Street



Photo 3. 2100 Del Monte Avenue



Photo 4. Monterey Sports Center and Pool



Photo 5. Ryan Ranch Corporation Yard



Photo 6. 498 Freemont Street





Photo 7. Ryan Ranch Corporation Yard



Photo 8. Monterey Wharf II



Photo 9. Monterey Wharf II



Photo 10. Steinbeck Plaza Area

