



July 26, 2006 NATURAL RESOURCES DEFENSE COUNCIL

Electronic Mail and U.S. Mail

Chair Jeffrey S. Young and Members of the Board
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Re: Monterey Regional Storm Water Management Program --
Redraft & Proposed Changes

Dear Chair Young and Members of the Board,

On behalf of the Natural Resources Defense Council ("NRDC"), the Otter Project, Friends of the Sea Otter, Defenders of Wildlife, and the San Luis Obispo Coastkeeper, we are pleased to support adoption of the June 1, 2006 redraft of the Monterey Regional Storm Water Management Program ("MRSWMP") providing it is adopted *with the July 26, 2006 change sheet submitted by the MRSWMP Group*, attached to this letter. NRDC has worked for many months with the MRSWMP group and, together, we have formulated a plan which we believe is significantly improved. We appreciate, and wish to acknowledge, the effort of the MRSWMP group in reflecting, and extending, their commitment to water quality protection in the pages of the MRSWMP along with the change sheet.

Thank you for the opportunity to review and provide comments on the proposed MRSWMP and accompanying change sheet. We look forward to reviewing with you in more detail the commitments set forth in the MRSWMP when you meet to consider it at the September Board Hearing.

Sincerely,

David S. Beckman
Anjali I. Jaiswal
Natural Resources Defense Council

Steve Shimek
The Otter Project

Gordon Hensley
San Luis Obispo Coastkeeper

D'Anne Albers
Friends of the Sea Otter

Jim Curland
Defenders of Wildlife

Electronic cc: Bruce Fujimoto, SWRCB
Roger Briggs, Ryan Lodge, & Donette Dunaway, RWQCB 3
MRSWMP Group

Jaiswal, Anjali

From: Bob Jaques [bobj@mrwpca.com]
Sent: Wednesday, July 26, 2006 2:05 PM
To: rhodge@rb3.swrcb.ca.gov
Cc: Jaiswal, Anjali; Bob Jaques; andy@mpwmd.dst.ca.us; Anya_Spear@csumb.edu; blundega@ci.seaside.ca.us; cpina@mpusd.k12.ca.us; cgallego@monterey.k12.ca.us; chieko.nguyen@monterey.army.mil; chris.coburn@noaa.gov; clayton@neilcorp.com; cpreuss@harris-assoc.com; craig.o'donnell@asm.ca.gov; weeks@co.monterey.ca.us; dpaul@monterey.k12.ca.us; exec@sealters.org; dawn.heyes@noaa.gov; dro@redshift.com; bairdd@pom-emh1.army.mil; dingerso@ci.seaside.ca.us; diane_ehlers@csumb.edu; ddunaway@rb3.swrcb.ca.gov; kraffea@co.monterey.ca.us; Garrett Haertel; gcramblett@ci.marina.ca.us; bice@ucmbest.org; policy@sealters.org; jbliting@waterboards.ca.gov; jcolangelo@ci.pg.ca.us; snowy@ecologyfund.net; Karen Harris; Keith Israel; kelly@sandcity.org; kliske@eccact.org; llanter@ci.seaside.ca.us; baumanl@co.monterey.ca.us; lisa.emanuelson@noaa.gov; orcamaris@earthlink.net; mniccum@pbosd.org; monicab@sbcglobal.net; npapadakis@ambag.org.; RGUILLEN@ci.carmel.ca.us; lewarner@co.monterey.ca.us; Rsimonich@ml.cdengeiners.com; Riedl@ci.monterey.ca.us; RKETLEY@ci.watsonville.ca.us; rblakley@pgusd.org; lundquist@co.monterey.ca.us; SpruancR@pebblebeach.com; rhodge@rb3.swrcb.ca.gov; caseys@pebblebeach.com; skulakow@cdengineers.com; slaughlin@saveourshores.org; stelker@ci.pg.ca.us; tohallor@ci.seaside.ca.us; reeves@ci.monterey.ca.us

Attachments: Proposed Revisions to MRSWMP 7-24-06 - NRDC track changes with all changes accepted from 7-26-06.doc

Ryan,

Attached is a compilation of changes to the June 1, 2006 version of the MRSWMP. Our Management Committee and NRDC (Anjali) have agreed that these changes are all mutually acceptable, and that NRDC can now support adoption of the MRSWMP. They will be sending you a letter to that effect shortly.

Bob <<Proposed Revisions to MRSWMP 7-24-06 - NRDC track changes with all changes accepted from 7-26-06.doc>>

7/26/2006

**PROPOSED REVISIONS TO MONTEREY REGIONAL
STORM WATER MANAGEMENT PROGRAM (MRSWMP)**

JULY 26, 2006

The following is a compilation of revisions proposed to the version of the MRSWMP dated June 1, 2006. The page numbers referred to below refer to the "clean version" titled "Revised June 1, 2006" and which does not contain revisions highlighted. The clean version serves as the basis for the page references below, because there were some page number differences between the highlighted and clean versions, due to the addition or deletion of text between the two versions.

LOCATION OF PROPOSED REVISION	PROPOSED REVISION (where entirely new paragraphs or sections are proposed for insertion, only the new text is shown below; where only partial revisions to existing text are proposed, the revisions are shown in boldface italics, with the remainder of the existing language shown in normal font)
Table 4-1 Page 6	<p>Revise the Measurable Goal for BMP 2-2.b to read as follows:</p> <p>Each permit holder to recruit volunteers through two separate agency channels; e.g. email, paycheck stuffers, internal newsletters, etc. <i>Track recruitment efforts, coordination support and financial support, and track number of participants and volume of waste collected and report this information in the Annual Reports for the indicated years.</i></p>
Table 4-1 Page 7	<p>Revise the Measurable Goal for BMP 2-2.c to read as follows:</p> <p>Provide stenciling equipment, supplies, and maps of inlets to be stenciled, <i>and complete a minimum of 300 drains and tabulate areas stenciled. Percent of all entities completed per year will be approximately 5-10%.</i></p>
Table 4-1 Page 12	<p>TABLE 4-1 MCM3: ILLICIT DISCHARGE DETECTION & ELIMINATION:</p> <p>EPA recommends that the plan to detect and address illicit discharges (discharges to storm drains and sewers that are not composed entirely of storm water) include the following four components: procedures for locating priority areas likely to have illicit discharges; procedures for tracing the source of an illicit discharge; procedures for removing the source of the discharge; and procedures for program evaluation and assessment.</p> <p><i>(Note: Illicit Discharge Detection and Elimination is described principally in three documents contained in Appendix E: 1) Protocol for Responding to Reports of Illegal Discharges and Illicit Connections; 2) Protocol For Taking Action Against Violators of the Municipality's Urban Storm Water Quality Management Discharge Control Ordinances; and 3) Guidance Document for Policies Pertaining to Illicit Connections and Illegal Discharges to Storm Water Systems.)</i></p>

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Table 4-1 Page 27	<p>TABLE 4-1 MCM5: POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT:</p> <p>Permit holders must educate the development community about the importance of the storm water program.</p> <p>This will include adopting standards for incorporating environmental measures into new construction that minimize storm water impacts.</p> <p><i>(Note: Post-Construction Storm Water Management in New Development and Redevelopment is described principally in three documents contained in Appendix E: 1) New Development and Redevelopment (describing BMPs); 2) Mandatory Design Standards; 3) Guidance Document for Policies and Procedures Pertaining to New Development and Redevelopment; and 4) Development Project Plan Review and Inspection Procedures.)</i></p>
Table 4-1 Page 20	<p>TABLE 4-1 MCM 4: CONSTRUCTION SITE STORM WATER RUNOFF CONTROL:</p> <p>The permit holders must develop a program to control the discharge of pollutants from construction sites.</p> <p><i>(Note: Construction Site Storm Water Runoff Control is described principally in three documents contained in Appendix E: 1) Construction Sites (describing construction BMPs); 2) Guidance Document for Policies and Procedures Pertaining to Construction Sites; and 3) Construction Site Review and Inspection Procedures.</i></p>
Table 4-1 Page 10	Add the following new Implementation Plans and Measurable Goals to BMP 2-2.d:

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	Prioritize Pollutants of Concern (see subheading titled "Conclusions" on page 4-13) from Urban Watch and First Flush data; conduct source tracking using upstream monitoring for highest priority pollutants and use this to identify probable sources; inspect these sources under Minimum Control Measure No. 3 and take appropriate corrective actions in accordance with BMPs 3-3.d and 3-4.a		X	X	X	X	In each of the indicated years perform source tracking on the two highest priority pollutants of concern on a minimum of one outfall, and report on findings and actions taken in the Annual Reports for each of the indicated years.	MS4 Administration

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Table 4-1 Page 10	<p>Within the MRSWMP area the First Flush and Urban Watch monitoring programs will be expanded to include the following: Outfalls which receive drainage from commercial, industrial, or residential areas which meet the following criteria: (1) Are over 18" in diameter, and (2) Are safe for volunteers/staff to access, including those that discharge to a 303(d) listed water body. Conduct monitoring on these additional outfalls for a similar set of constituents as are monitored under the Urban Watch and First Flush Programs. Monterey County will focus on 303(d) listed water bodies in Year 2, and will expand into the other water bodies over the remaining permit term.</p>		X	X	X	X	<p>A minimum of 25% of all outfalls within the MRSWMP area will be monitored four times a year in each of the indicated years. Representative samples will be collected to account for seasonal variation. The results will be included in the Annual Reports for those years.</p>	MRSWMP Group

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Table 4-1 Page 10	<p>Based on existing scientific studies and data, the MRSWMP Group will implement a pollution reduction component that identifies with specificity the geographic areas within the jurisdiction of each municipality that are sources of pollution, including T. Gondii and other pathogens, impacting California sea otters.</p> <p>Once the geographic areas are identified the MRSWMP group will create and implement a program to reduce and eliminate the sources of pollution identified as impacting sea otters.</p>	X	X				<p>Year 1: Based on existing scientific studies and data identify with specificity the geographic areas within the jurisdiction of each municipality that are sources of pollution, including T. Gondii, and other pathogens, impacting California sea otters and results included in the Annual Report;</p> <p>Year 2: Create and implement a program to reduce and eliminate the sources of pollution identified as impacting sea otters. The program and implementation will be described in the Annual Report.</p>	MRSWMP Group

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Table 4-1 Page 10	Provide financial support for, or assistance with, volunteer monitoring programs and public participation events such as: Urban Watch, First Flush, Snapshot Day, and Walk N' Talk Days	X	X	X	X	X	Provide \$500 annually for <i>Snap Shot Day</i> for print ads to recruit volunteers.	MRSWMP Group
Table 4-1 Page 11	Delete in its entirety BMP 2-3.b							
Table 4-1 Page 15	For BMP 3-3.b, make the following edit to the Measurable Goal: Minimum of <i>100% of inventoried businesses inspected by the end of the permit term.</i>							
Table 4-1 Page 23	For BMP 4-3.a, the implementation schedule will cover Years 2 through 5, not Years 1 through 5.							
Table 4-1 Page 27	For BMP 5-2.a, the implementation schedule will cover Years 2 through 5, not Years 1 through 5.							
Table 4-1 Page 32	For BMP 6-4.a, edit the language to read as follows: Train municipal staffs to use the procedures contained on pages E-174 through E-175 of Appendix E to <i>properly manage landscape and lawn care activities</i> . Offer training to other agencies such as school districts beginning in Year 3.							
E-8	Edit the language of the next to the last paragraph under the Section titled "School Outreach" as follows: The measurable goal will be tabulated by the number of volunteer hours contributed by the total participants, number of storm drains stenciled and location of activity. In the first year of the five-year plan we plan to have a 100 volunteer hours. <i>During the five-year permit we plan to reach more than 50% of the student population.</i>							

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E-8	<p>Edit the language as follows:</p> <p><i>1.3 Grades 9-College. Community stenciling offered for this age group. High school and college students are required to complete community service hours in order to graduate. Educational materials will be offered to the upper grade levels as well as a list of community resources available to students and teachers.</i></p>
E-8	<p>Insert the following paragraph:</p> <p><i>In an effort to integrate environmental science with communication and biology, educators and their students will be made aware of the media facility called Access Monterey Peninsula (AMP). Students will have the opportunity to create a short piece on stormwater that could be aired on the local cable channel. This could be part of a student project for graduation.</i></p>
Page E-10	<p>Delete the highlighted wording in the following paragraph:</p> <p>The BMP's will be available for distribution through individual City department offices, targeted mailings via city newsletters, and Monterey County offices. Mailings to targeted businesses will be done over five years. <i>In addition, 2,000-3,000 brochures will be mailed annually to residents.</i> The effectiveness will be measured by counting the number of BMP brochures distributed. These numbers will be reported in the annual report.</p>

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Page E-10	<p>Insert the following paragraph just prior to the subheading titled "Household Hazardous Waste Services in Monterey County":</p> <p style="text-align: center;"><i>Residential Outreach</i></p> <p><i>The city of Monterey and Pacific Grove send out newsletters to their residents. Specific BMP information targeting homeowners will be included in newsletter mailings. Monterey mails newsletters to all residents three times per year. Pacific Grove sends their newsletters two times per year.</i></p> <p><i>Additionally, the permit group will try to coordinate with the local trash collector, water and sewer agency to incorporate stormwater messages into mailing inserts to reach residents in other cities and the county not listed above. The effectiveness will be measured by counting the number of residents reached via mailings. These numbers will be reported in the annual report.</i></p>
E-13	<p><u><i>Restaurant Training.</i></u> The Program Coordinator <i>will</i> partner with MBNMS to fulfill this program aspect.</p>

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E-14	<p>Edit the language of the last paragraph under the Section titled "Restaurant Training" as follows:</p> <p>Outreach is accomplished by making an appointment with the manager to bring the video to a meeting of the kitchen staff. The bilingual video is approximately seven minutes long in each language. The video depicts five proper BMP techniques to reduce urban runoff. Following the video a bilingual survey is given to each staff member. Upon completion the surveys are returned to the Program Coordinator. A laminated bilingual poster for the kitchen and bilingual brochures "Monterey Begins On Your Street" is left with the manager to distribute. <i>Distribution and viewing of the restaurant video by kitchen staff is one step toward becoming involved the Green Business Program certification program which is discussed in more detail below.</i></p>
E-15	<p>Edit the language of the last paragraph under the Section titled "Restaurant Outreach/Green Business Program" as follows:</p> <p>Measurable goals include tabulating the number of restaurant staff reached through bilingual surveys and the number of posters, videos, and brochures distributed. <i>In the first year under the Restaurant Outreach/Green Business program a total of 75 restaurants will be visited and targeted educational materials distributed.</i> A second visit will be offered in order to show the video to restaurant staff and have surveys completed by employees. At the end of each year the program will be evaluated and changes made if needed. The restaurant video is being used outside the area covered by the MRSWMP by the cities of Watsonville and Santa Barbara. Outreach will continue in years 2-5. Other methodologies will be researched and adapted as needed to reach restaurant staff.</p>

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E-25	<p>Edit the language regarding BMP 2-2b as follows:</p> <p>BMP 2-2.b will recruit volunteers through municipal employee base for Annual Coastal Cleanup Day or other local clean up efforts; <i>track recruitment efforts, coordination support, and financial support; track number of participants and volume of waste collected.</i></p>
E-25	<p>Edit the language regarding BMP 2-2.c as follows:</p> <p>BMP 2-2.c will: (1) Provide support for, or assistance with storm drain stenciling through supplies, volunteer recruitment, and staff labor. Individual cities have been conducting storm drain stenciling events for years in their own area. The MRSWMP group offers a more regionalized and organized approach toward this activity allowing for the pooling of resources for equipment, supplies, coordination and publicity, and (2) <i>Complete a minimum of 300 drains and tabulate areas stenciled. Percent of all entities completed per year will be approximately 5-10%.</i></p>
E-30	Delete in its entirety the "MRSWMP Monitoring Activities" description

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E-79	<p>Edit the wording in the introductory paragraphs of the section titled <u>“PROTOCOL FOR TAKING ACTION AGAINST VIOLATORS OF THE MUNICIPALITY’S URBAN STORM WATER QUALITY MANAGEMENT AND DISCHARGE CONTROL ORDINANCE”</u> as follows:</p> <p><i>The municipality will follow the enforcement provisions of the ordinance it adopts, similar to those set forth in Division V “Enforcement” of the Model Ordinance contained in this Appendix E. The municipality will determine what enforcement action is necessary and appropriate for each violation on a case-by-case basis, taking into consideration such things as prior history of violations and severity of pollution impact. The municipality will follow the phased approach to enforcement described below, including issuance of a warning or administrative action or legal action. The municipality will have the authority to initiate any enforcement action deemed appropriate for the violation. The municipality may modify the approach described below to avoid conflicts with other existing policies and requirements.</i></p> <p><i>It is the municipality’s intention and expectation that fines or other penalties will be levied for first time violators, at the discretion of the municipality, and that as the norm the cost of clean up will be levied against the violator. It is also the municipality’s intention that for ongoing or flagrant violators, fines will be mandatory</i></p>

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E-126	<p>In the next to the last paragraph of the <u>“GUIDANCE DOCUMENT FOR POLICIES AND PROCEDURES PERTAINING TO CONSTRUCTION SITES”</u> make the following edits:</p> <p>Site inspections will be documented using the Construction Site Inspection Checklist contained in Appendix E to this MRSWMP. If incidents of noncompliance are observed during inspections, <i>the following followup actions will be taken, using the Protocol for Taking Action Against Violators of the Ordinance contained in Appendix E to this MRSWMP: (1) If during any inspection the inspector determines that construction BMPs and measures are required and have not been installed, and that water quality is threatened as a result thereof, it is the municipality’s intention and expectation that fines or other penalties will be levied against first time violators, and the inspector will require installation of the necessary and specified BMPs within 1 day during the rainy season and 3 days during the dry season; (2) An inspector will return to the site within 48 hours after the period requiring the installation of a BMP to confirm installation. If the required BMPs have not been correctly installed, a Stop Work Order will be issued. Construction may only resume if all required BMPs and measures have been correctly put into place and confirmed by an inspector.</i> Documentation will be kept on the response and the outcome of the observed incident(s) of noncompliance using the Construction Site Inspection Checklist.</p>

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E-128	<p>Add the following paragraph at the end of Step 3 of the <u>CONSTRUCTION SITE PLAN REVIEW AND INSPECTION PROCEDURES</u>:</p> <p><i>The following construction and grading project requirements, or their equivalents, will be included in local grading and construction permits to ensure that pollutant discharges are reduced to the maximum extent practicable, and that water quality objectives are not violated during the construction phase:</i></p> <ul style="list-style-type: none"> a. <i>Project proponent must develop and implement a plan to manage storm water and non-storm water discharges from the site at all times;</i> b. <i>Project proponent must minimize grading during the wet season and coincide grading with seasonal dry weather periods to the maximum extent practicable. If grading does occur during the wet season, require project proponent to implement additional BMPs for any rain events which may occur, as necessary for compliance with the draft Monterey Proposal and General Permit to meet MEP and assure compliance with water quality standards;</i> c. <i>Project proponent must emphasize erosion prevention as the most important measure for keeping sediment on site during construction;</i> d. <i>Project proponent must utilize sediment controls as a supplement to erosion prevention for keeping sediment on-site during construction, and never as the single or primary method;</i> e. <i>Project proponent must minimize areas that are cleared and graded to only the portion of the site that is necessary for construction;</i> f. <i>Project proponent must minimize exposure time of disturbed soil areas;</i> g. <i>Project proponent must temporarily stabilize and reseed disturbed soil areas as rapidly as possible;</i> h. <i>Project proponent must permanently revegetate or landscape as early as maximally practicable;</i> i. <i>Project proponent must stabilize all slopes; and</i> j. <i>Project proponents subject to California's statewide General NPDES Permit for Storm Water Discharges Associated with Construction Activities, (hereinafter General Construction Permit), must provide evidence of existing coverage under the General Construction Permit</i>

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E-137	<p>Add the following language to the end of the Section titled "<u>GUIDANCE DOCUMENT FOR POLICIES AND PROCEDURES PERTAINING TO NEW DEVELOPMENT AND REDEVELOPMENT</u>":</p> <p><i>In order to obtain approval each construction project that is subject to the "Mandatory Design Standards" in the BMP Guidance Series must include, at a minimum:</i></p> <ul style="list-style-type: none"> • <i>Implement all applicable BMPs as identified on page E-111 of the MRSWMP.</i> • <i>Implement source control BMPs for all applicable development projects.</i> • <i>Implement site design/landscape characteristics where feasible which maximize infiltration, provide retention, slow runoff, and minimize impervious land coverage for all development projects.</i> • <i>Implement buffer zones for natural water bodies, where feasible. Where buffer zone implementation is infeasible, require project proponent to implement other buffers such as trees, lighting restrictions, access restrictions, etc.</i> • <i>For industrial applicants subject to California's statewide General NPDES Permit for Storm Water Discharges Associated with Industrial Activities (Except Construction), (hereinafter General Industrial Permit), the applicant must provide evidence of coverage under the General Industrial Permit.</i> • <i>Ensure grading or other construction activities meet the provisions specified in the construction program of the draft Monterey Proposal.</i> • <i>Provide proof of a mechanism which will ensure ongoing long-term maintenance of all structural post-construction BMPs.</i>

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E-179	<p>On page 1 of the Sweeping and Cleaning Schedule, make the following edit:</p> <p><u>Del Rey Oaks</u> <i>All residential streets Twice a month</i> <i>County High priority areas (heavy use) – all streets weekly; Medium priority areas (medium use) – twice per month</i></p>
E-197	<p>“Hot-Spot” areas are commercial zones where there is high pedestrian traffic which typically generates high levels of trash. Throughout the “hot-spot” areas, all catch basins will be inspected prior to the beginning of the rain year, and if trash accumulations of more than <i>two</i> inches exist, the catch basin will be cleaned.</p>
Pg. E-37	<p>All of the entities are to add the following to their storm drain maps: pipes; inlets; outfalls and other drainage structures including description of feature type.</p>

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E-30 and E-80 and 81	<p>(where entirely new paragraphs or sections are proposed for insertion, only the new text is shown below; where only partial revisions to existing text are proposed, the revisions are shown in boldface italics, with the remainder of the existing language shown in normal font)</p> <p>Replace the sentence that begins with "<i>If tracking a discharge through visual inspection of upgradient manholes...</i>" with the following wording "<i>In addition to visual inspections the following may be implemented:</i></p> <ul style="list-style-type: none"> • <i>Using the inspection check lists in Appendix E of the MRSWMP, inspect premises to see if signs of illicit discharges exist (such as looking for stains, smelling odors, seeing improperly stored hazardous materials products or wastes).</i> • <i>Dye testing of building sewer drains with downstream inspection of storm drains to determine if illicit connections exist.</i> • <i>CCTV inspection of storm drains to discover signs of sewage.</i> • <i>Smoke testing of storm drains to see if signs of cross connections exist (such as smoke coming from sewer vents).</i> • <i>Visual inspection of buildings to discover apparent sources of sewage.</i>"