## SUMMARY OF CHANGES MADE BETWEEN THE FEBRUARY 17, 2004 AND THE OCTOBER 27, 2004 VERSIONS OF THE MRSWMP

- 1. Over a period of approximately four and one-half months the Management Committee overseeing preparation of the MRSWMP worked diligently to make revisions to the February 17, 2004 version to respond to comments received, and to more fully and clearly describe the scope and intent of the MRSWMP. The Chair of the Management Committee, which is comprised of representatives of each of the nine co-permittees, created a special committee comprised of Committee members and staff specifically for this purpose. That special committee held numerous meetings, and regularly reported on its progress and solicited input and direction from the full Management Committee throughout this period.
- 2. The content of the MRSWMP was extensively modified as follows:
  - **A.** The cover page was re-dated to reflect the October 27, 2004 Management Committee approval date.
  - **B.** The Table of Contents was updated to reflect the numerous text revisions.
  - **C.** On pages 1-2 and 4-7, language was added to reflect the fact that the Municipal Urban Run-off Program had been used as a resource in preparing the MRSWMP. This is also noted in the revised Public Education and Public Outreach Plan
  - **D.** On page 3-3 a short new section titled "Coordinating Entities" was added to describe the working relationship that was developed with the three local school districts. These relationships have been formalized through written agreements between those Districts and the Management Committee of the MRSWMP.
  - **E.** On page 3-4 a new section was added discussing the implications of Areas of Special Biological Significance to some of the co-permittees. Much of this language was taken directly from the SWRCB's hearing notices regarding their issuance of an exception to the Scripp's Institute discharge in the San Diego area. The language was intentionally left broad, but clearly states that the impacted entities will be working with RWQCB on this matter, and that they will ultimately do what the RWQCB requires of them regarding these discharges.
  - F. In Section 4 "Best Management Practices and Measurable Goals":
    - i. Starting on page 4-7 the discussion regarding how the BMPs and Measurable Goals were selected was expanded to include the processes that were undertaken after receiving the public review comments.
    - ii. The discussion of the BMPs and Measurable Goals, starting on

page 4-14, was extensively rewritten to conform to the new matrix of BMPs and Measurable Goals.

- iii. A completely new BMP and Measurable Goals matrix was prepared to replace the prior matrix. The new matrix was prepared to respond to the comments that were received, and to more completely describe the scope and content of the MRSWMP. Numerous new BMPs and Measurable Goals were created. In response to some of the comments, more detailed descriptions of these were provided, and changes were made to the Measurable Goals to ensure that they would provide clear indicators of the progress being made in implementing the MRSWMP. Some of the changes that were made in response to specific comments include:
  - 1. At the bottom of page 3-1, language was added stating that the purpose of the MRSWMP is to reduce pollution from storm water. The language then goes on to explain that it is also expected that the MRSWMP will fulfill the copermittees' Phase II requirements.
  - 2. In order to demonstrate that a uniform approach will be used, the matrix now indicates that all entities will be working under the same BMP implementation schedule, and using the same Measurable Goals, rather than working on individual entity schedules as contained in the previous version of the MRSWMP. Also to demonstrate a uniform approach, certain of the BMPs under Minimum Measures No. 4 and No. 5 were revised toward the objective of developing standardized ordinances that will be put into effect in all of the co-permittees' jurisdictions, rather than having differing storm water management policies and requirements between jurisdictions.
  - 3. The commitment to encourage general public and stakeholder input in the MRSWMP, and involvement in identifying and solving storm water management problems, was strengthened through BMP 2-1. This BMP calls for holding two well-advertised public workshops each year to help accomplish this objective. These workshops, as well as the annual review and updating of the Public Education and Outreach Program under BMP 1-1.b, will ensure that public comments and lessons learned will be incorporated into subsequent years' programs. The workshops will also provide the opportunity for public review of the draft Annual Reports, so that public comments can be reflected in those reports when they are submitted each year.
  - 4. Though not listed as a BMP, because these were done in early response to one of the commentors, the following actions were taken to generate public input to help prepare the revised MRSWMP:

- a. Placing copies of the draft MRSWMP in each of the participating entity's city clerks (or equivalent) office, and in the public libraries located within each of their jurisdictions
- b. Distributing a press release to the newspapers in the area
- c. Putting information on entity members' websites alerting the public to the availability of the MRSWMP
- d. Placing paid display ads in the Monterey County Herald informing the public of the availability of the MRSWMP and their opportunity to provide comments on it.

These actions satisfied the commenter, who subsequently withdrew his request for a public hearing to air his concerns.

- 5. Support for volunteer storm water pollution monitoring programs (including First Flush and Urban Watch) both in the form of financial contributions and through recruiting volunteers, was added under BMP 2-2. Continuing close coordination between the MRSWMP and these monitoring programs will be assured through BMP 2-3, which calls for the MRSWMP to have a representative regularly attending meetings of the Citizen Water Quality Monitoring Network. As described in Appendix F, the Public Participation and Involvement Program, several of the entities covered by the MRSWMP were instrumental in creating some of these existing monitoring programs, and are already actively participating in them.
- A hotline for the public to report illicit or illegal discharges, or other types of storm water pollution activities they observe, was created under BMP 3-1 using 1-800-CLEANUP. That BMP calls for publicizing the existence of the hotline, and describes actions entities will take in response to such reports.
- 7. Specific BMPs to address pollution from landscaping and pest control, discharges from boats, and discharge of only dechlorinated swimming pool water were added in the form of BMPs 6-4, 3-6, and 6-5.
- 3. The draft version of the Public Education and Outreach Program was replaced with the final version in Appendix E. The final version is more comprehensive and contains substantially greater detail. It also describes how the work of the MRSWMP will be coordinated with other public education programs, such as those being conducted by the Monterey Bay National Marine Sanctuary and neighboring Phase I and Phase II permittees.
- 4. A new Appendix F containing the Public Participation and Involvement

Program was added. Appendix F provides a comprehensive description of the actions that will be taken under the MRSWMP to promote public participation and involvement in storm water management activities.