

Major revisions to Administrative Draft of the MRP in response to stakeholders' comments – May 2007

C.3 New Development

- **Road Reconstruction** – from all roads to arterial roads only considering costs and feasibility.
- **Impacticability before Alternative Compliance** – Remove the requirement for such a test to facilitate Alternative Compliance.
- **Require LID approach in Project Designs** – with one-year compliance schedule
- **Single Family with 5000 square feet or more of impervious surface** - implement one or more site design LID measures with no inspection burden on the municipalities.
- **3rd Party Design Certification** – Clarify that project proponent may pay for 3rd party design certifications.
- **HMP Implementation** - Improve consistency among all Phase I Permittees.

POC – TMDL

- **Mercury/PCBs** – Requires enhanced actions and pilot actions, rather than feasibility studies of potential actions.
- **Pesticides** – Includes suite of actions developed in Urban Pesticide Work Group
- **Copper** – Requires work with industrial sources, in addition to brake pad actions, architectural copper, pools and spas.
- **PBDEs/Selenium/PFOs/PFAs/nonylphenols/legacy pesticides:**
Characterization of distributions, source analysis, loads assessment, and identification of control measures.

Trash Reduction in Creeks –

- **Identify and Assess Trash Hot Spots** – select high impacted sites, conduct assessments, compare with trash “trigger” levels which are no longer stated as effluent limits in response to comments.
- **Implement Trash Reduction Measures** – required measures to include pilot installation and maintenance of trash capture devices at a number of locations per county as a first phase in response to comments.
- **Track Trash Accumulation** – Use assessment data to demonstrate progress over permit term, assist with development of trash flux measurement method.

Monitoring –

- **Status and Trends monitoring** – Monitor major waterbodies in 5 year rotation, selecting from groups of waterbodies in some cases. Added pathogen monitoring.
- **Long Term Trends Monitoring** – Reduced number of monitoring stations for small Programs.
- **Reporting** – Moved electronic and written annual reporting date to May to simplify reporting requirements.
- **Bioassessment Protocol** – Removed fish from the protocol because methods are not fully developed.

Municipal Maintenance –

- Clarify that replacement of 75% of sweepers with regenerative air or better occurs only during normal replacement, in response to comments.
- Monitor Dissolved Oxygen and other key water quality parameters at 20% of pump stations draining largest catchments.

Industrial, Construction, Illicit Discharge-

- Biweekly Construction inspections during the rainy season on sites 50 acres or larger, may be completed during routine inspections for other purposes, in response to comments received.
- Illicit Discharge - Collection system screening required only during the dry season and during routine maintenance activities, as opposed to special purpose screening inspections during wet and dry weather.

Public Outreach/Participation-

- No major changes.

Exempt Non-Stormwater

- Included reporting and monitoring requirements for planned, unplanned, and emergency potable water discharges; added benchmark values for chlorine residual, pH, and turbidity to evaluate BMPs effectiveness.