

MEMO:

TO: District Commissioner
FR: District Director
RE: Sustainability Program
DT: May 7, 2015

Gentlemen;

Some issues were discovered in a review of the Districts Sustainability Program documents and Ordinance No. 11, which changed the District Sewer Use Ordinance to provide for the Sustainability Program.

During development of the Clearwater Sustainability Plan, Memorandums 8.0, 8.1, 8.2, and 8.4 were presented to the Commission. 8.0 was an overview of the process. 8.1 provided CMOM content and requirements. 8.2 Listed parts required in annual reporting by Communities to the District. And 8.4 provided for Community self-regulation, performance and problem reporting requirements, and enforcement issues.

The Commission has not taken any action to accept or adopt these Memorandums. I feel consideration should be given to adopt these Memorandum, in part or whole, as part of the Sustainability Plan and Program.

**Memorandum No. 8.0
Clearwater Sustainability Plan
Overview**



Date: May 31, 2012

To: David Casper, HOVMSD Commissioner
Bruce Siebers, HOVMSD Commissioner
Stephen Giebel, HOVMSD Commissioner
Peter Wallace, HOVMSD Commissioner
Kevin Coffey, HOVMSD Commissioner
Mark Surwillo, HOVMSD

Copy: Ed Nevers, Donohue & Associates

From: Tammy Kuehlmann, Donohue & Associates

Re: Clearwater Sustainability Plan Overview

CLEARWATER SUSTAINABILITY PLAN OUTLINE

The following is a summary of the Sustainability Plan elements as laid out in the Facility Plan Amendment. Specific components of the Sustainability Plan include:

1. CMOM Program
2. Annual report from the member communities to the HOVMSD
3. Flow monitoring and analysis
 - a. Measure clear water flows
 - b. Trend analysis and long-term flow frequency analysis
4. Self-regulation and enforcement by HOVMSD
 - a. Ordinance revisions
 - b. Special Orders

The Sustainability Plan outline was discussed at the October 2011 Commission Meeting and is attached for reference.

CMOM PROGRAM

HOVMSD will expand the WDNR CMOM (Capacity, Management, Operation, and Maintenance) program with minor modifications, revisions, or adjustments. CMOM components include:

- Goals
- Organization including personnel, internal communications, and public input
- Legal authority over public and private system components
- Maintenance of collection system including lift stations

- Design and performance provisions to insure the sewer systems are designed and constructed properly
- Overflow emergency response plan
- Capacity assurance review
- Annual self-audit
- Annual compliance report

CMOM programs will need to be completed and available for HOVMSD review 2 years after WDNR approved the facility plan amendment (2014).

The WDNR guidance on development of a CMOM program is attached for reference.

ANNUAL REPORTING BY MEMBER COMMUNITIES TO HOVMSD

The Compliance Maintenance Annual Report (CMAR) report was developed by the WDNR to address selected areas of the CMOM. Communities already need to complete a CMAR similar to the one that HOVMSD completes except that communities complete section L (financial management), M (sanitary sewer collection system), N (grading summary), and O (resolution or owner statement) only. Each CMAR area is given a letter grade by the member communities. Areas with a C, D, or F will require a response from the member community with D and F requiring a specific action plan

The satellite community CMAR prepared by WDNR and Wisconsin Statute NR208 on Compliance Maintenance are attached for reference.

FLOW MONITORING AND ANALYSIS

Flow monitoring at meter stations and assessment modeling for individual events, trend line analysis, and long-term frequency analysis is the cornerstone of the Sustainability Facility Plan Amendment. The need for additional clear water reduction projects would be determined by the trend line analysis. If a trend line indicates that peak clear water flows are increasing for an individual member community, the community will then need to develop a specific action plan to address the increasing clear water flow.

Long-term flow frequency analysis will determine continued compliance. Decreases in the return period (increase in its probability of being exceeded) of a given event will require a specific action plan to address clear water flow.

Any overflow in the HOVMSD system would require an analysis of its return period and if necessary, a specific action plan.

ENFORCEMENT AND SELF-REGULATION BY HOVMSD

Ordinance revisions

Changes to the HOVMSD I/I Ordinance will outline the new sustainability plan. Administrative procedures would be then developed based upon the ordinance changes to outline the specific requirements for each member community to follow.

A copy of the current HOVMSD I/I ordinance is attached for reference.

Special Orders for non-compliance

Special orders will be written by HOVMSD to address requirements for community specific action plans if a member community fails to comply with the ordinance or if a community triggers an action plan as described in the CMAR or does not meet performance standards based upon the flow monitoring and assessment modeling.

Financial penalties for non-compliance with Special Orders are outlined in Wisconsin Statutes; therefore, it doesn't require a plan to be developed by HOVMSD.

CLEARWATER SUSTAINABILITY PLAN ITEMS FOR DISCUSSION

CMOM PROGRAM

- Define the program goals that the member communities will need to address
- Define the level of documentation needed by member communities
- Assign interim milestones
- Comment on design and/or performance provisions
- Comment on maintenance of collection system (allowable inflow / infiltration)
- Provide technical guidance as member communities develop their CMOM program

ANNUAL REPORTING BY MEMBER COMMUNITIES TO HOVMSD

- Determine if additional reporting sections covering topics of staffing, legal authority, design and performance standards, overflow response, and capacity assurance need to be reported
- Determine the format for reporting
- Require, by ordinance, that a copy of the annual CMAR report be submitted to HOVMSD for review
- Require, by ordinance, that a response to areas scoring C, D, or F and a specific action plan for areas scoring a D or F be submitted to HOVMSD.
- Determine if areas scoring a D or F trigger the need for a Special Order

FLOW MONITORING AND ANALYSIS

- Determine the monitoring and assessment that will be done annually
- Determine triggers for community specific action plans or special orders
- Discuss long-term flow frequency analysis and when it should be completed
- Outline the requirements for ordinance revisions

ENFORCEMENT AND SELF-REGULATION BY HOVMSD

- Outline requirements for CMOM (refer to CMOM section)
- Outline requirements for annual reporting (refer to annual reporting section)
- Outline flow and I/I limitations and penalties (refer to flow monitoring and analysis section)
- Determine if additional changes are required
- Timeline for changes

Attachments:

1. Sustainability Plan discussion outline from October 2011
2. WDNR CMOM Booklet
3. Satellite Community CMAR
4. NR 208 Compliance Maintenance
5. Comparison of Annual Clear Water Reduction Rates from Facility Plan Amendment
6. HOVMSD Inflow/Infiltration Ordinance

Memorandum No. 8.1

CMOM Requirements



Date: December 11, 2012

Revised: August 13, 2013

To: David Casper, HOVMSD Commissioner
Bruce Siebers, HOVMSD Commissioner
Stephen Giebel, HOVMSD Commissioner
Peter Wallace, HOVMSD Commissioner
Kevin Coffey, HOVMSD Commissioner
Mark Surwillo, HOVMSD

From: Tammy Kuehlmann, Donohue & Associates

Re: CMOM Requirements

In early 2012, HOVMSD presented the Wisconsin Department of Natural Resources with an alternative to the requirement to remove 30% of the district wide peak flow clear water. WDNR accepted the HOVMSD Facility Plan Amendment in April 2012, under the stipulation that a "Sustainability" Facility Plan would replace the current Clearwater Reduction Program and its reporting requirements. The goal of the sustainability plan is a program that maintains or extends the longevity of the WWTF and interceptor capacity by not increasing the existing level of clear water in the system and even continuing to reduce the levels of clear water entering the sanitary system. Existing levels of clear water in the member communities' collection systems will not produce overflows either at the WWTF or in the HOVMSD interceptor system. The "sustainability" plan will advance the goal preventing overflows.

CLEARWATER SUSTAINABILITY PLAN OUTLINE

The following is a summary of the Sustainability Plan elements as laid out in the Facility Plan Amendment. Specific components of the Sustainability Plan include:

- 1. CMOM Program**
2. Annual report from the member communities to the HOVMSD
3. Flow monitoring and analysis
 - a. Measure clear water flows
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4. Self-regulation and enforcement by HOVMSD
 - a. Ordinance revisions
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This technical memorandum outlines the requirements for the first item of the Sustainability Plan, the CMOM (Capacity, Management, Operation, and Maintenance) Program.

HOVMSD will not require specific budgets, operation schedules and minimum requirements, capacity minimums or other quantitative measures. Those measures should be set by individual communities as

they are the most qualified to make those decisions. The self-regulation and enforcement of the Sustainability Program will be performance based and will closely follow the stated goals of the CMOM Program as stated below.

CMOM PROGRAM

A CMOM program includes the following components:

- Goals
- Organization including personnel, internal communications, and public input
- Legal authority over public and private system components
- Maintenance of collection system including lift stations
- Design and performance provisions to insure the sewer systems are designed and constructed properly
- Overflow emergency response plan
- Capacity assurance review
- Annual self-audit
- Annual compliance report

In April 2009, the WDNR provided communities with a guidance document for the preparation of a CMOM program. That document services as the basis of the HOVMSD CMOM program. Communities need to follow the guidance, making adjustments as necessary to fit their specific community needs.

HOVMSD has determined that there are elements that need to be included in each community's document. These items are in addition to those that the community needs to satisfy the goals of their program. Those elements are outlined below:

STEP 1: GOALS

Include the following in with your community specific goals for your collection system:

- No sanitary sewer overflows
- No basement back-ups
- No infrastructure failure (street or sewer collapse) due to lack of maintenance
- Maintain capacity for community and industry growth within the community and HOV interceptor

Specific goals with implementation dates should include:

- Review and update your sewer use ordinance. Cross check your sewer use ordinance to insure compliance with HOVMSD ordinances.
- Implement a Grease Control Inspection Program by July 2014. Assume that HOVMSD will provide you with guidelines for the Grease Control Inspection Program by July 2013.
- Identify and eliminate illegal sump pump hookups, cross connections, and other illicit connections.
- Design and implement an on-going sewer condition evaluation program.

- Establish an adequate budget for repair and rehabilitation projects that are projected for the next three years (update annually).

STEP 2: ORGANIZATION

Provide contact information for the following positions within the community:

- CMOM Manager
- Administration
- Technical Personnel responsible for the implementation of the program

STEP 3: LEGAL AUTHORITY

Establish legal Authority for the following:

- Sewer Use Ordinance that has been reviewed and modified as necessary for compliance and consistency with HOVMSD's ordinance
- Fat, Oil, and Grease Control Program by July 2014.
- Private Property Clear Water inspections. Also demonstrate the legal authority to have illicit connections removed within a specified timeframe or face established penalties. Connections that are illicit include sump pumps, and roof or foundation drains.

STEP 4: OPERATION AND MAINTENANCE

In general, O&M activities should be specifically quantified or identified. General ranges or percentages do not provide the appropriate level of specificity.

- Cleaning and Root Removal should be decided by what is appropriate for your community
- Flow Monitoring: where or which parts of your collection system
- Sewer Line Televising: Where and when
- Manhole Inspections: identify critical manholes in addition to others
- Manhole Rehabilitation: identify the number that need rehabilitation and the schedule for rehabilitation
- Mainline Rehabilitation: identify where rehabilitation is needed and the schedule for the rehabilitation
- Private Sewer Lateral Inspections: how many need to be inspected, where are replacements necessary
- Lift Station O&M: provide annual inspection at a minimum. Prepare and include an O&M checklist.
- Alarm System (at lift stations): O&M checklist on the alarm system with annual testing at a minimum. This item is addressed in the WDNR guidance in Step 6 Emergency Plan but should be included in the O&M section of the CMOM.

STEP 5: STANDARDS

No additional requirements

STEP 6: EMERGENCY PLAN

The emergency plan section should address emergency preparedness and procedures. All items listed in the WDNR guidance should be included. The alarm system and routine maintenance should be addressed in the Step 4 O&M section.

Communications/Notifications should include WDNR, internal personnel, the public, media, and HOVMSD.

STEP 7: CAPACITY ASSURANCE

Capacity assurance should evaluate the adequacy of the collection system to convey wastewater. At a minimum, communities should continue wet weather and dry weather inspections of critical manholes. Critical manhole inspections should also include back-to-back rainfall inspections to document the conditions during high antecedent soil moisture.

Additional work may be required by communities to verify the capacity of their system including monitoring, investigations, and research.

All capacity assurance should include back up information to document how the capacity assurance was determined. A system-wide map should be included with areas of flow limiting capacity highlighted.

STEP 8 AND 9: ANNUAL SELF-AUDIT / SPECIAL STUDIES

All collection system performance indicators listed in the WDNR guidance should be included in your CMOM document. It is not necessary to report the station or sewer mile/year quantity. Instead, documentation of failures should include the number of failures and where those failures occurred. A map indicating the location is required. Failures include but are not limited to lift stations, sewer pipes, sanitary sewer overflows, basement backups (for any reason), and complaints.

Peaking factor ratios do not need to be reported. This information is compiled by HOVMSD at meter stations and will be provided to communities along with daily rainfall totals.

In many cases, Special Studies have been prepared by communities. Communities have at a minimum a Sewer System Evaluation Survey that was completed as part of the Clear Water Reduction Program. Special Studies do not need to be included in the CMOM but, if applicable, should be referenced by document title and date. This information should be updated as the Special Studies are updated.

STEP 10: COMPLIANCE MAINTENANCE ANNUAL REPORT

Communities will provide a copy of their Annual CMAR to HOVMSD along with their annual report. The details for the annual report will be outlined in a future Technical Memorandum.

CMOM DEADLINE

A written CMOM program, documenting each individual community's procedures is due to Heart of the Valley Metropolitan on March 1, 2014.

Comments on the CMOM document will be returned to individual communities within two months of receiving the document. Communities have until July 1, 2014 to provide HOVMSD with their completed, written program with documentation it has been approved by the governing body that owns the sanitary system.

Memorandum No. 8.2

Annual Report



Date: August 14, 2013

To: David Casper, HOVMSD Commissioner
Bruce Siebers, HOVMSD Commissioner
Stephen Giebel, HOVMSD Commissioner
Peter Wallace, HOVMSD Commissioner
Kevin Coffey, HOVMSD Commissioner
Mark Surwillo, HOVMSD

From: Tammy Kuehlmann, Donohue & Associates

Re: Annual Report

In early 2012, HOVMSD presented the Wisconsin Department of Natural Resources with an alternative to the requirement to remove 30% of the district wide peak flow clear water. WDNR accepted the HOVMSD Facility Plan Amendment in April 2012, under the stipulation that a "Sustainability" Facility Plan would replace the current Clearwater Reduction Program and its reporting requirements. The goal of the sustainability plan is a program that maintains or extends the longevity of the WWTF and interceptor capacity by not increasing the existing level of clear water in the system and even continuing to reduce the levels of clear water entering the sanitary system. Existing levels of clear water in the member communities' collection systems will not produce overflows either at the WWTF or in the HOVMSD interceptor system. The "sustainability" plan will advance the goal preventing overflows.

CLEARWATER SUSTAINABILITY PLAN OUTLINE

Specific components of the Sustainability Plan include:

1. CMOM Program
- 2. Annual report from the member communities to the HOVMSD**
3. Flow monitoring and analysis
 - a. Measure clear water flows
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4. Self-regulation and enforcement by HOVMSD
 - a. Ordinance revisions
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This technical memorandum outlines the requirements for the annual report.

ANNUAL REPORT

The intent of the annual report is to update the District on an individual community's efforts toward maintaining a sustainable level of inflow and infiltration. The report will generally include five components:

1. CMAR as submitted to WDNR
2. WDNR response to the CMAR
3. Summary of construction and non-construction inflow/infiltration reduction projects
4. Local ordinance changes related to inflow/infiltration
5. CMOM updates or changes

Details of the sections, resolution, and deadlines are detailed in the following sections.

CMAR AND WDNR RESPONSE

The Compliance Maintenance Annual Report (CMAR) is a self-evaluation report and grading system for Wisconsin's sanitary sewer systems. According to the WDNR, "CMAR brings awareness and understanding to governing officials about wastewater capital and management needs." Most importantly, CMAR is a communication tool. Depending on the actual grade, low CMAR grades require recommendations or action plans by the community to address system deficiencies. A copy of the current satellite community CMAR is attached. Satellite communities have been required to submit CMARs to the WDNR since 2008.

The annual CMAR form (eCMAR) is submitted electronically using this process:

- No later than **April 30**, DNR makes applicable sections of the eCMAR form available electronically through their switchboard (<http://dnr.wi.gov/topic/switchboard/index.html>).
- No later than **June 30**, Satellite communities submit their completed eCMAR form containing information from the previous calendar year to the DNR.
- By **August 31** of the year in which the eCMAR form was received (or within 60 days of receipt, whichever is later) DNR provides a response to the eCMAR form and associated information.

The annual report to HOVMSD must include a copy of the submitted CMAR and WDNR response and associated information.

SUMMARY OF PROJECTS

Provide a summary of the construction and non-construction inflow/infiltration projects completed or in-progress during the CMAR reporting year. Summaries shall include:

- Details of the construction projects including the location, length, number of laterals, size of pipe.
- Construction observations related to inflow/infiltration, i.e. illicit connections, condition of sewer or manhole. Quantify the observations to the extent possible.

- Photographs when relevant.
- Details of non-construction projects.
- Number of inspections including general observations, quantified when possible. Observations should also include the general areas inspected within the community.
- General results of community-wide monitoring or observations.

Most of the construction and non-construction projects are summarized in the CMAR. This section should provide details of those projects. As an example, the CMAR asks “Did your sanitary sewer collection system maintenance program include the following maintenance activities? Complete all that apply and indicate the amount maintained.” CMAR reports a percentage of the system per year. HOVMSD wants additional quantified details such as length and number.

LOCAL ORDINANCE CHANGES

Changes to local ordinance(s) related to wastewater/inflow and infiltration should be included in the report. A brief narrative describing the change and reason for the change should accompany the ordinance revision(s).

CMOM UPDATES AND CHANGES

A community CMOM is considered a living document. As a community grows and/or changes, the CMOM should be updated to reflect those changes.

Each individual HOVMSD member community is responsible for the entire collection system that discharges to HOVMSD at their meter station. This may include portions of a collection system within the boundary of another community. Key personnel and emergency contacts for all portions of the system should be included in the Organization section of the CMOM.

Changes to a community including annexations, new installations, contact information, or emergency procedures should be reflected in a CMOM within 90 days of the change.

Changes to a community’s accepted CMOM program should be included in the annual report. A brief narrative describing the change and reason for the change(s) should accompany the CMOM revised section(s).

GOVERNING BODY RESOLUTION

The annual report is a communication tool between HOVMSD and its member communities. Therefore, the governing body of each HOVMSD member community must review each year’s annual report and pass a resolution regarding it. The resolution should be included in the transmittal of the annual report to HOVMSD.



REPORT SUBMITTAL

The annual report with review resolution will be completed and submitted to the HOVMSD no later than October 31 of each year beginning in the year 2014, and continuing thereafter until further order of HOVMSD.

Memorandum No. 8.4

Enforcement



Date: November 14, 2013

To: David Casper, HOVMSD Commissioner
Bruce Siebers, HOVMSD Commissioner
Stephen Giebel, HOVMSD Commissioner
Peter Wallace, HOVMSD Commissioner
Kevin Coffey, HOVMSD Commissioner
Mark Surwillo, HOVMSD

From: Tammy Kuehlmann, Donohue & Associates

Re: Enforcement

In early 2012, HOVMSD presented the Wisconsin Department of Natural Resources with an alternative to the requirement to remove 30% of the district wide peak flow clear water. WDNR accepted the HOVMSD Facility Plan Amendment in April 2012, under the stipulation that a "Sustainability" Facility Plan would replace the current Clearwater Reduction Program and its reporting requirements. The goal of the sustainability plan is a program that maintains or extends the longevity of the WWTF and interceptor capacity by not increasing the existing level of clear water in the system and even continuing to reduce the levels of clear water entering the sanitary system. Existing levels of clear water in the member communities' collection systems will not produce overflows either at the WWTF or in the HOVMSD interceptor system. The "sustainability" plan will advance the goal preventing overflows.

CLEARWATER SUSTAINABILITY PLAN OUTLINE

Specific components of the Sustainability Plan include:

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 - a. Ordinance revisions
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This technical memorandum outlines the requirements for the self-regulation and enforcement by HOVMSD.

In general, the enforcement actions are patterned after *NR 208.06 CMAR* review and responses and based on the objectives of the CMOM Program as identified in *Memorandum 8.1 CMOM Requirements*. There are three levels to HOVMSD enforcement: Voluntary, Recommendation, and Action. There are several triggers to enforcement. Those triggers include review of CMAR reporting and WDNR response, flow monitoring and evaluations, observations. A copy of NR208 is attached for reference.

VOLUNTARY RESPONSE

A voluntary response to negative changes within the collection system may be provided by member communities at any time. NR 208.06 (3) and (4) provide details for including the voluntary response in the CMAR. For HOVMSD, a voluntary response can be included in a member community's annual report.

RECOMMENDATION RESPONSE

The recommendation response enforcement consists of the member community recommending steps or actions that have been or will be taken to address problems or deficiencies identified by set triggers. In all cases, recommendations shall be included in a member community's annual report resolution. Recommendations will be reviewed by HOVMSD and comments will be provided to the community.

TRIGGERS – CMAR GRADE

Any CMAR section receiving a grade of C, as stated in NR 208.06(3).

For a CMAR grand point average of 2.00 – 2.99, as stated in NR 208.06(4).

In addition to meeting the requirement of NR 208, a schedule for implementation of the recommendations shall be included. HOVMSD shall be copied on all correspondence to and from the WDNR on this issue.

TRIGGERS – CMOM

Goals for community specific CMOM programs included:

- No sanitary sewer overflows
- No basement back ups
- No infrastructure failures due to lack of maintenance

Any time a CMOM goal identified above is not met, a recommendation response is required by the community. A schedule for implementation of the recommendation is required.

TRIGGERS – CAPACITY/FLOW ANALYSIS

HOVMSD monitors inflow and infiltration through the Antecedent Moisture Model or alternative model as set by HOVMSD. When the model indicates that the amount of I/I entering the system is increasing for the second and third consecutive years, a recommendation response is required by the community. For enforcement, the first year of evaluation will be 2014 using the 2013 flow monitoring and rainfall data.

ACTION RESPONSE

The action response enforcement requires municipalities to develop an action plan to address problems or deficiencies identified by set triggers. In all cases, recommendations shall be included in your annual report resolution. Recommendations will be reviewed by HOVMSD and comments will be provided to the community. Special orders will be issued for communities that require an action response.

TRIGGERS – CMAR GRADE

For any CMAR section resulting in a grade of D or F, the municipality is required to submit an action response plan to the WDNR. According to NR 208.06(3), the response shall be included in the CMAR resolution. In addition to meeting the requirements of NR 208, the response shall also identify the schedule for implementation of the action response plan. HOVMSD shall be copied on all correspondence to and from the WDNR on this issue.

For a CMAR grade point average less than 2.00, the municipality shall comply with NR 208.06(4). HOVMSD shall be copied on all correspondence to and from the WDNR on this issue.

TRIGGERS – CMOM

Goals for community specific CMOM programs included:

- No sanitary sewer overflows
- No basement back ups
- No infrastructure failures due to lack of maintenance

Any time a CMOM goal identified above is not met for a second consecutive year, HOVMSD requires an action response is by the community. For a basement back-up to occur for a second consecutive year, the back-up would have to be at the same location or at a property with a connection within 200' feet of the previous back-up. A schedule for implementation of the recommendation is required.

TRIGGERS – CAPACITY/FLOW ANALYSIS

HOVMSD monitors I/I through the Antecedent Moisture Model or alternative model as set by HOVMSD. When the model indicates that the amount of I/I entering the system is increasing for the fourth consecutive year, an action response is required by the community. For enforcement, the first year of evaluation will be 2014 using the 2013 flow monitoring and rainfall data.

TRIGGERS – HOVMSD SYSTEM PERFORMANCE

Should HOVMSD have collection system performance or treatment plant issues as a result of excessive I/I or failing grades on their CMAR as a result of I/I outside of the HOVMSD interceptor, HOVMSD will work with member communities to develop an action response.

SPECIAL ORDERS

Special orders will be issued for communities that require an *Action Response*.

Special orders are be issued by HOVMSD pursuant to the provisions of Wis. Stats. Sections 200.11(1)(d) and 200.45(2). Special orders are issued to a specific community, directing compliance with the Ordinance of the District within the time and manner specified in the special order.

Details of the special orders will be developed on a case-by-case basis by the HOVMSD after discussions with the subject community.

ORDINANCE REVISIONS

After review and discussion of this memorandum, HOVMSD should have the document reviewed by their attorney for inclusion as revisions to the district's ordinance. Donohue will present the enforcement plan to the municipalities through a Technical Advisory Committee meeting. The meeting is scheduled for Tuesday, October 1, 2013 at 1:15 p.m. at the Combined Locks Community Center. The district should receive their attorney's initial comments prior to the TAC meeting so that they can be included in the community discussion.

Attachments: NR 208 Compliance Maintenance