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The language for additional required BMPs for Special and Impaired Waters as noted in Item 7 of the Fact Sheet seems unclear in Part X Section 381.1 of the Draft ISGP - "The Permittee shall develop and implement stormwater control measures, including BMPs that restrict the facility industrial stormwater discharges to the extent necessary to preserve the existing high quality, or to preserve the wilderness, scientific, recreational, or other special characteristics that make the water an Outstanding Resource Value Water."

Is the additional BMP documentation in the SWPPP only required for ORV Waters or any Special or Impaired Water? Can the permit language be updated to make the requirement more clear?