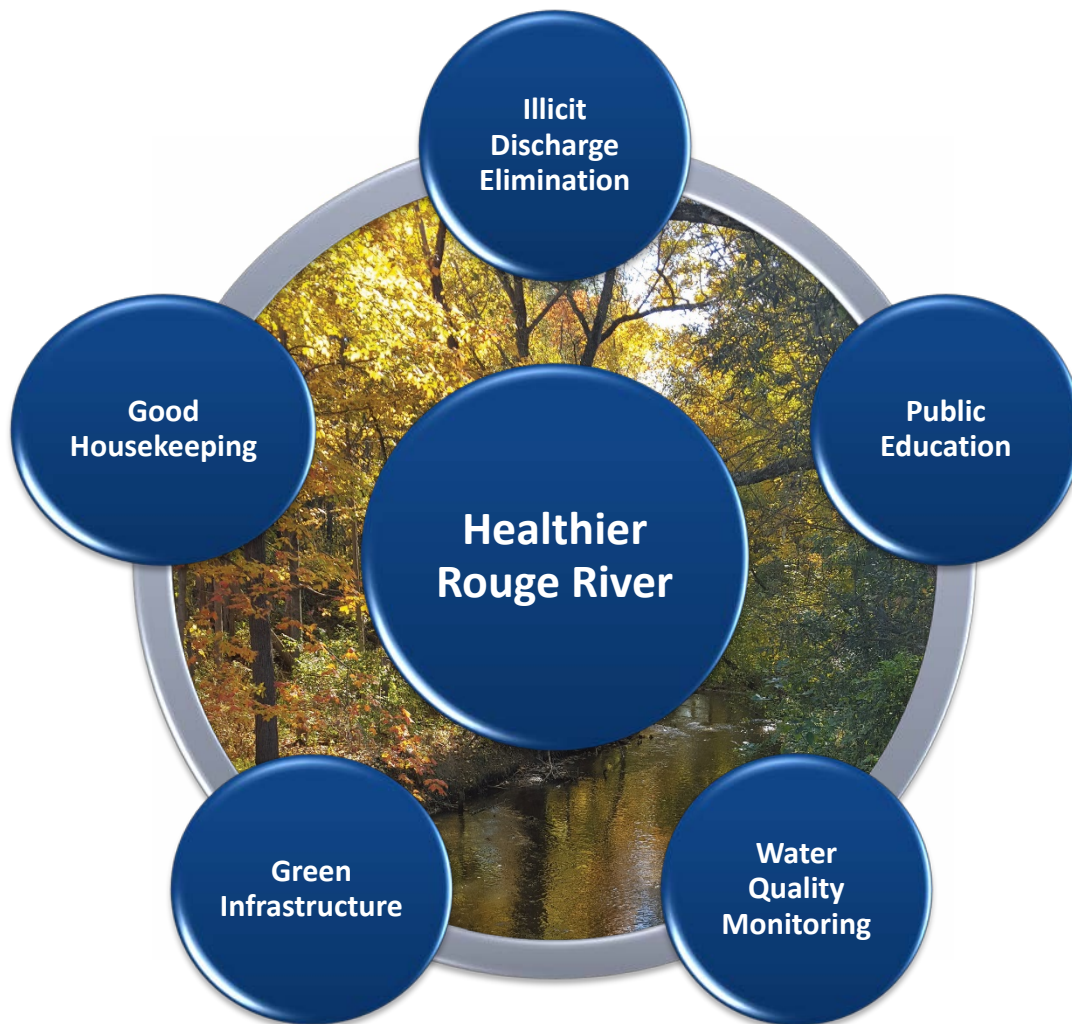


ROUGE RIVER COLLABORATIVE TOTAL MAXIMUM DAILY LOAD (TMDL) IMPLEMENTATION PLAN FOR MUNICIPAL STORMWATER PERMITTEES



Prepared by:

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September 5, 2019
Revised January 14, 2020

From: [Hendges, Martin \(EGLE\)](#)
To: [Annette DeMaria](#)
Cc: [Alexander, Christine \(EGLE\)](#); [Alwin, Christe \(EGLE\)](#)
Subject: RE: Rouge TMDL Plan update
Date: Monday, September 09, 2019 7:33:32 AM

Annette,

This version of the Rouge TMDL Plan dated September 5, 2019 satisfies our remaining comments and is hereby approved.

Please inform the Rouge TMDL Plan participating MS4 permittees that they can go ahead and upload this approved version to their MiWaters sites and remove any draft versions. I am also going to inform some other permittees since this was the last remaining item that was holding up their permit reissuance.

Thank you for your work on developing and revising the plan.

Martin Hendges
Senior Environmental Quality Analyst
Water Resources Division/Warren District Office
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[Follow Us](#) | Michigan.gov/EGLE



From: Annette DeMaria <ademaria@ectinc.com>
Sent: Thursday, September 5, 2019 12:23 PM
To: Alexander, Christine (EGLE) <ALEXANDERC2@michigan.gov>; Hendges, Martin (EGLE) <HENDGESM@michigan.gov>
Subject: RE: Rouge TMDL Plan update

Marty and Chris, on behalf of the Alliance of Rouge Communities, I am forwarding the revised TMDL plan for EGLE review and approval. I have included 1) a redline version so you can easily see what has been modified from the previous version and 2) a clean pdf version in the hopes that we are at the finish line.

Please me know if you have any questions.

Annette DeMaria, P.E., PMP
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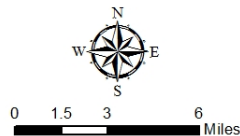
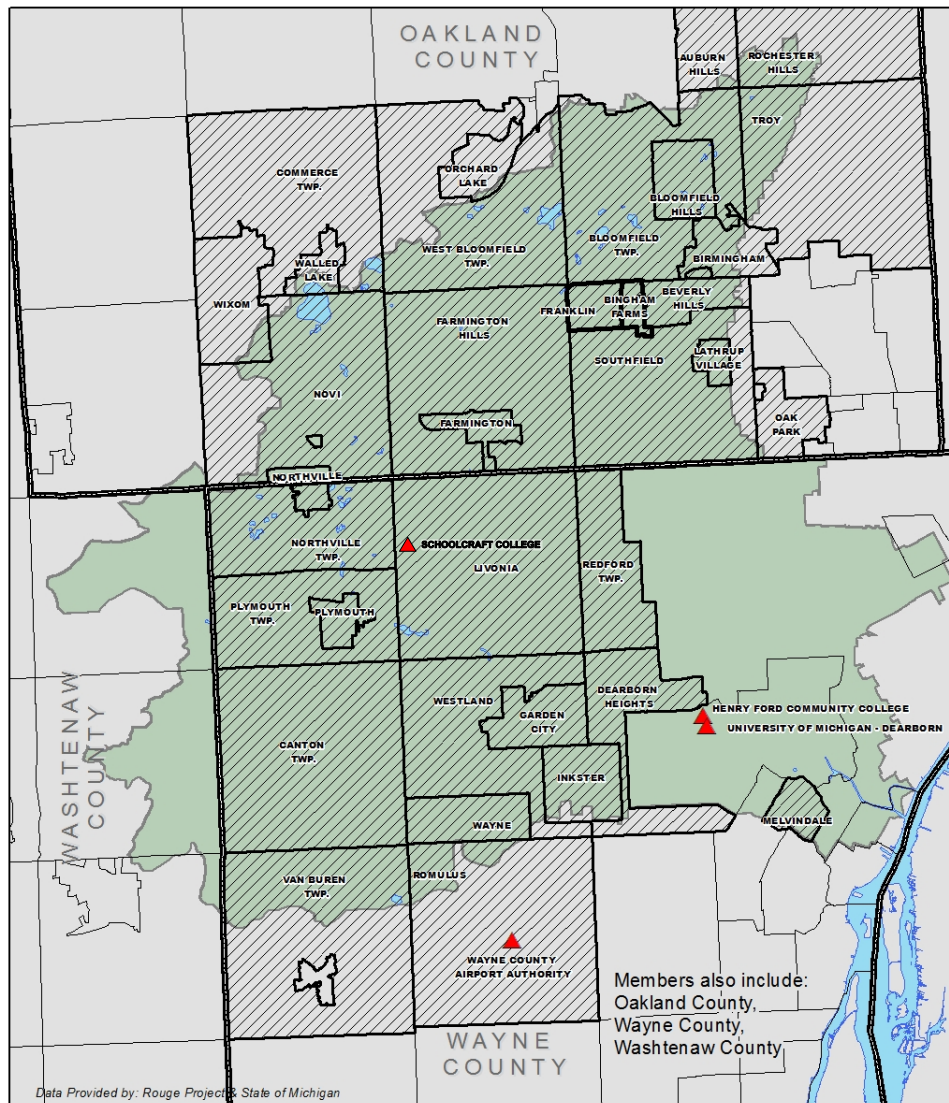
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Attachment A	List of Participating Members
Attachment B	BMP Selection Criteria and Ranking

A. Introduction

The Alliance of Rouge Communities (ARC), a 501(c)(3) organization, is a voluntary public watershed entity currently comprised of municipal governments, counties, schools, and cooperating partners as authorized by Part 312 (Watershed Alliances) of the Michigan Natural Resources and Environmental Protection Act (MCL 324.101 to 324.90106) as amended by Act No. 517, Public Acts of 2004. The purpose of the ARC is to provide an institutional mechanism to encourage watershed-wide cooperation and mutual support to meet water quality permit requirements and to restore beneficial uses of the Rouge River to the area residents.



ARC Member Communities

February 2017

This Collaborative Plan (Plan) presents the watershed-wide approach to effectively and efficiently address the pollutants contained within approved Total Maximum Daily Load (TMDL) Assessments for the Rouge River watershed. This Plan was developed by the Technical Committee of the Alliance of Rouge Communities (ARC) in response to the requirements under the State of Michigan’s Permit Application for Discharges of Storm Water to Surface Waters of the State from a Municipal Separate Storm Sewer System (MS4), revised October 2015.

This Plan is intended to meet the TMDL elements of the permit application: questions 85 – 88. These requirements are as follows:

- Provide a procedure for identifying and prioritizing BMPs to reduce the TMDL pollutants,
- Provide a list of BMPs that will be implemented to reduce the TMDL pollutants, and
- Provide a monitoring plan to assess the effectiveness of the BMPs.

The U.S. Environmental Protection Agency (EPA) requires a TMDL Assessment for waterbodies identified on the state’s impaired waters list. EPA has approved three TMDL Assessments within the Rouge River watershed as listed below. The *E. coli* and biota assessments apply to the entire watershed, while the dissolved oxygen (DO) assessment only applies to the City of Northville, Northville Township and the City of Novi.

- *Escherichia coli* (*E. coli*) (MDEQ, 2007a)
- Biota (MDEQ, 2007b)
- Dissolved Oxygen for Johnson Creek (up to 6 Mile Road) (MDEQ, 2007c)

This Plan will address each of these parameters within the limits of the MS4 permit. **As such, this should not be considered an implementation plan to address all sources, only those under the authority of the MS4 permit.**

This Plan will be implemented by the participating communities through the end of the permit cycle for the Rouge River watershed. The list of permittees participating in this Plan can be found in **Attachment A**.

B. Background

Within the TMDL Assessments, the MDEQ established primary and secondary targets for municipal stormwater permittees as shown in **Table 1**¹. When the primary target is met, the waterbody has achieved the goals of the TMDL and the waterbody would be eligible for removal from the state’s impaired waters list. The secondary target parameters can be thought of as surrogates that will be useful in determining the success of the selected best management practices that are needed to reduce pollutant loads. In all three assessments, the MDEQ opted to assign collective targets to the MS4 permittees rather than individual targets. This would seem to indicate that the MDEQ recognizes that demonstration of progress can be shown on a watershed-basis rather than within jurisdictional

¹ For ease of understanding, this document refers to concentration-based, rather than load-based targets. The pollutant load targets listed in the TMDLs are based on these concentrations.

boundaries. It should be noted that the *E. coli* target is equivalent to the state's full body contact standards for recreational waters which will be very difficult to achieve in urban stormwater runoff.

Table 1 – TMDL Targets for Municipal Stormwater Permittees

Parameter	TMDL Targets for MS4 Permittees Primary (1°) and Secondary (2°)	Notes
<i>E. coli</i>	1°: 300 cfu/100 ml and 130 cfu/100 ml	Daily geometric mean value 30 day geometric mean value
Biota	1°: Procedure 51 scores ≥ Acceptable 2°: Suspended solids ≤ 80 mg/l	For 2 successive years Annual average during wet weather
Dissolved Oxygen	1°: 7 mg/L 2°: Suspended solids ≤ 80 mg/l*	Johnson Creek is considered a cold water stream, thus has a target of 7 mg/L; all other reaches of the Rouge River have a target of 5 mg/L.

*This concentration is presumed for the purposes of this document, but it was not explicitly listed in the DO TMDL.

B.1. *E. coli* Conditions

Between May and October 2005, the MDEQ evaluated *E. coli* conditions on a routine basis during a range of weather conditions at approximately 70 locations across the watershed. Issues were found during both dry and wet weather conditions at most sites as indicated in **Table 2**. MDEQ also determined that human sources of *E. coli* were likely present at a few sites based on DNA analyses. However, only a few samples with elevated *E. coli* levels were evaluated for the presence of human DNA (MDEQ, 2007a).

Table 2 – Summary of *E. coli* Data from the *E. coli* TMDL

River Branch	Range of Exceedances by Site (% of samples above the standard)		
	Above the Monthly Standard of 130 cfu/100 ml	Above the Daily Standard of 300 cfu/100 ml	Above the Partial Body Contact Standard of 1,000 cfu/100 ml
Lower	89 – 100%*	41 – 100%	9 – 83%
Main	59 – 100%	40 – 100%	0 – 71%
Middle	89 – 100%	39 – 100%	9 – 91%
Upper	100%	90 – 100%	48 – 86%

*Table interpretation note: at least one site had 89% of samples exceed the monthly standard and at least one site had all (100%) samples exceed the monthly standard. The remaining sites fell within this range.

B.2. Suspended Solids Conditions

For the Biota TMDL, the MDEQ calculated the mean suspended solids concentration of each major river branch using data collected by the Rouge Project between 1994 and 2001 (**Table 3**). Data was considered wet weather if the sample was taken after a dry period (generally three days minimum) followed by a precipitation event (generally greater than 0.25 inches) that caused the river to respond significantly (Hufnagel 1996). In addition, an annual sediment load of 33,800 tons/year was calculated using the Simple Method model based on 33 inches of annual rainfall, 2003 land use data and event mean concentrations developed by Cave, et al for various land uses. Based on the secondary target of 80 mg/l during wet weather, a suspended solids loading target of approximately 29,000 tons/year was established. This would require a 15% reduction in sediment loads from stormwater permittees (MDEQ, 2007b).

Table 3. Suspended Solids Concentrations by River Branch

River Branch	Mean Suspended Solids Concentration (mg/l)	
	Wet Weather*	Dry Weather
Lower	191	37
Main	114	27

River Branch	Mean Suspended Solids Concentration (mg/l)	
	Wet Weather*	Dry Weather
Middle	95	19
Upper	152	30
Watershed-wide	138	28

*The secondary TMDL target is 80 mg/l as an annual average during wet weather.

B.3. Dissolved Oxygen Conditions

For dissolved oxygen, the MDEQ determined that 3% of samples collected within the TMDL reach of Johnson Creek (a cold water stream) were below the target of 7 mg/l. This result was primarily based on 43,000 hourly DO values collected at 7 Mile Road by the Rouge Project between 1994 and 1996. The instances of low DO occurred primarily during low flow (non-runoff) conditions and high flows often resulted in higher levels of DO. Based on available data of other suspect pollutants, the MDEQ determined sediment oxygen demand was the primary factor affecting the low DO levels in Johnson Creek. They also noted that low base flow conditions were also contributing to the low DO levels. It is noted that data used in this assessment was at least 10 years old which may not reflect conditions at the time the assessment was written.

Based on modeling, the MDEQ estimated that the existing suspended sediment load from MS4s was 650 tons/year and that an 85% reduction was needed to meet the target of 96 tons/year. This should result in Johnson Creek meeting the 7 mg/l DO target for cold water streams during low flow conditions (MDEQ, 2007c). Note that the MDEQ did not explicitly state the concentration of suspended sediment needed to meet the target, only the load.

B.4. Pollutant Sources

The Alliance of Rouge Communities (ARC) determined the suspected sources and causes associated with each of the TMDL parameters as shown in Tables 4 and 5. Only those sources regulated under the MS4 permit are included in these tables.

Table 4 – Sources and Causes of *E. coli*

Suspected Sources*	Suspected Causes
Failing Septic Systems (OSDS)	<ul style="list-style-type: none"> Historical lack of septic system maintenance, education, inspection and correction. Undetected or uncorrected illicit discharges.
Illicit Sanitary Connections to a Storm System	<ul style="list-style-type: none"> Undetected or uncorrected illicit discharges.
Pet Waste/Urban Animal Waste	<ul style="list-style-type: none"> Little knowledge of the importance of pet waste /urban animal waste management. Loss of pervious areas via urban development.
Re-suspended Sediment	<ul style="list-style-type: none"> Excessive peak discharges Unsatisfactory infrastructure maintenance.

*Additional sources not regulated under the MS4 permit but contributing to the pollutant are uncontrolled combined sewer overflows, sanitary sewer overflows, sanitary sewer maintenance, wastewater treatment plant flows, and runoff impacted by animal waste from agricultural lands.

Table 5 – Sources and Causes of Sediment

Suspected Sources*	Suspected Causes
Roads/Highways/Bridges and Related Infrastructure on Municipal Properties	<ul style="list-style-type: none"> Loss of pervious areas via urban development. Insufficient stormwater infrastructure maintenance.
Infrastructure on commercial & industrial properties	<ul style="list-style-type: none"> Poor housekeeping. Insufficient stormwater infrastructure maintenance.

*Additional pollutant sources not regulated under the MS4 permit but likely contributing to the pollutant are eroding streambanks, and runoff from agricultural lands and communities not regulated to discharge stormwater.

B.5. Summary

Based on the information discussed above, addressing the indicator pollutants/parameters shown in **Table 6** will make progress toward addressing the impairments identified in the TMDLs.

Table 6. Indicators to be Addressed in this Plan

Indicators	Associated TMDLs
<i>E. coli</i>	<i>E. coli</i>
Suspended Solids	Biota Dissolved Oxygen <i>E. coli</i>
Stream flow	Biota Dissolved Oxygen <i>E. coli</i>

C. BMP Prioritization Procedure

Several criteria were used to prioritize the best management practices (BMPs) that should be implemented to address the impairments. These criteria are as follows:

- A. Ability of the BMP to affect human health impacts caused by direct contact with the river.
 - Low, moderate, high
- B. Ability of the BMP to impact the concentrations of *E. coli* and suspended solids in the river and/or reduce peak stream flows.
 - Low, moderate, high
- C. Ability of the BMP to impact multiple TMDL parameters
 - Low, moderate, high
- D. Anticipated level of impact of the BMP as compared to added cost to implement it.
 - Low, moderate, high
- E. Legal authority to implement the BMP.
 - Yes or no
- F. Are there prerequisite projects that need to be completed before the BMP can be implemented?
 - Yes or no.

This process will be reviewed and updated, if necessary, by the ARC within 90 days of the end of the permit term. The review will be based on the results of monitoring data and other measurables provided in Section E.

D. Selected BMPs

Using the criteria listed above, several BMPs were evaluated for implementation as shown in Attachment B. Those BMPs with the highest scores are listed in **Table 7** along with the associated TMDL pollutant. These BMPs will be implemented by ARC members on an ongoing basis or according to the frequencies/schedules listed in the collaborative plans and stormwater management plans (SWMP).

Table 7 – Best Management Practices to be Implemented

Best Management Practice	Associated TMDL Parameter
TMDL #1: Activities listed in the Rouge River Watershed Collaborative Illicit Discharge Elimination Plan and Wayne County’s SWMP	<i>E. coli</i>
TMDL #2: Review and approval of developer stormwater plans following the new Post-Construction Stormwater Standards	SS and Stream Flow
TMDL #3: Construction of stormwater management measures for permittee-owned projects on public property following the new Post-Construction Stormwater Standards	SS and Stream Flow
TMDL #4: Construction of stormwater management measures on privately owned sites following new Post-Construction Stormwater Standards	SS and Stream Flow
TMDL #5: Activities listed in the Rouge River Watershed Collaborative Public Education Plan including education on septic system maintenance, the impacts of improperly disposed of pet waste, the impacts of feeding waterfowl, and the pollution complaint line	<i>E. coli</i> and SS
TMDL #6: Conduct catch basin cleaning as listed in each permittee’s SWMP	SS and <i>E. coli</i>
TMDL #7: Conduct street sweeping as listed in each permittee’s SWMP	SS and <i>E. coli</i>
TMDL #8: Proper management of materials stockpiles as listed in each permittee’s SWMP	SS

Note: SS=Suspended solids

E. Evaluating Effectiveness

E.1. Evaluation Metrics and Milestones

The effectiveness of this Plan will be measured using the tracking metrics indicated in **Table 8**. The milestones included below are based on each permittee’s commitment in their SWMP. This information will be included in the permittees’ biennial report to the MDEQ.

Table 8 – Tracking Metrics for Evaluating Effectiveness

Metric	Milestone	BMP*
A. Success of Collaborative IDEP Plan Success of Wayne County IDEP Plan	See plans	TMDL #1
B. Status of adoption of Post-Construction Stormwater Standards by Permittee	100% of permittees adopt new standards	TMDL #2, #3
C. Number of stormwater plans reviewed for private sites under new standards vs previous standards	100%	TMDL #2
D. Percentage of permittee projects constructed under new standards vs previous standards; and Percentage of private projects constructed under new standards vs previous standards	100%	TMDL #3, #4
E. Success of Collaborative PEP Plan	See plan	TMDL #5
F. Number of catch basins cleaned	100%	TMDL #6
G. Miles of streets swept	100%	TMDL #7
H. Number of stockpiles showing no impact to stormwater runoff	100%	TMDL #8

*As described in Table 7.

Effectiveness will also be determined by monitoring results as described below and outlined in **Table 9**. The dates below assume that some of the Rouge permittees will be issued their permits by the end of 2019.

Table 9. Monitoring Plan

Parameter	Anticipated Monitoring Sites	Frequency	Schedule
Dissolved oxygen	Event 1 and 2: Johnson Creek at 7 Mile east of Sheldon Road	Event 1: 5 months Event 2: 2 months	Event 1: May – Oct 2017 Event 2: May – Oct 2022, if needed
<i>E. coli</i>	Event 1: A) Communities: Terminus of initial priority areas and Priority outfalls with discharge B) Wayne County: Priority area outfalls with discharge Event 2: Communities and Wayne County: Terminus of initial priority areas and Priority outfalls that required advanced investigations (Category A and B outfalls) plus select Category C outfalls for a minimum of 100 sites	Event 1: A) 1 time B) 1 time Event 2: 1 time	Event 1: A) 2018 B) 2017-2018 Event 2: May – Oct 2022
Suspended solids	Event 1: 90 sites (Figure 1) Event 2: Sites with average wet weather TSS > 80 mg/l and with single samples > 120 mg/L from Event 1.	Event 1: 5 times Event 2: 1 time	Event 1: May – Oct 2017 Event 2: May – Oct 2022

For *E. coli*, Event 1 sampling will take place at the terminus of the initial priority areas and priority outfalls that are being screened as part of the Collaborative IDEP Plan. At these sites, one dry weather sample will be collected. The initial priority areas are identified on **Figures 1 and 2** and the priority outfalls will be determined in 2018. In addition, Event 1 sampling will take place at the Wayne County-owned outfalls in 2017 and 2018. These outfalls are in the ARC’s initial priority areas. This sampling is part of the county’s outfall dry-weather screening process. Approximately, 500 outfalls (400 community-owned and 150 county-owned) will be screened during this process. We estimate that 175 samples will be collected based on the assumption that 40% of the community and 10% of the county outfalls will have discharge.

For Event 2, *E. coli* sampling will take place during dry weather at the terminus of the initial priority areas and at priority outfalls that had *E. coli* concentrations > 5,000 cfu/100 mL (Category A and B outfalls per the Collaborative IDEP Plan) during Event 1. In addition, outfalls with *E. coli* between 1,000 and 5,000 cfu/100 mL (Category C outfalls per the Collaborative IDEP Plan) during Event 1 will be sampled so that a minimum of 100 locations are sampled during Event 2. The Event 1 samples will be compared to the Event 2 samples to determine the effectiveness of reducing *E. coli* levels.

DO levels in Johnson Creek were evaluated in 2017 as shown in **Figure 3**. This will be the Event 1 data. Although the data is still provisional, it is expected that the water quality standard of 7 mg/L will be met more than 90% of the time. As a result, the creek is expected to be removed from the impaired waters list in the 2020 Integrated Report. However, if the creek is not removed from the impaired waters list, Johnson Creek will be re-monitored at the same location (7 Mile and Sheldon roads) for Event 2. This monitoring will consist of continuous readings for a period of two months during the summer. This data will be compared to the 2017 results collected during the same period.

Suspended sediment levels were measured at 90 sites across the watershed in 2017 as shown in **Figure 4** for Event 1. Samples were collected on a routine basis to include both dry and wet weather conditions.

The monitoring sites were selected to catch tributaries prior to the confluence with the larger branches of the River. This was done to better identify pollutant sources. Sites were also located throughout the main branches of the Rouge to capture water quality from those stormwater outfalls discharging directly to the main branches. Effort was made to include monitoring sites in all MS4 permittee's jurisdictions that have open streams that drain to the Rouge. For Event 2, suspended sediment sampling will be repeated during wet weather at sites where the average wet weather TSS values exceeded 80 mg/l and where single sample values exceeded 120 mg/L in 2017. This sampling will occur one time during wet weather. The Event 1 and Event 2 data will be compared to the values included in **Table 3** (from the Biota TMDL Assessment) to determine if progress has been made in achieving the wet weather suspended sediment target of 80 mg/L.

Two reports will be prepared as part of this plan. First a metric summary report will be developed following the submittal of the permittees second progress report. This report will describe the progress toward meeting the milestones provided in **Table 8**. In addition, a TMDL effectiveness report will be prepared that summarizes the monitoring data outlined in **Table 9**. This report will compare the most recent data to the previously collected data to determine if the permittees are making progress toward meeting the pollutant reduction goals established in the *E. coli*, Biota and DO TMDL Assessment reports.

Schedule: Metric Summary Report: Due March 30, 2023
 TMDL Monitoring Report: Due March 30, 2023

ARC Member Responsibilities:

- ARC (as contracted by the permittees)
 - Conduct instream monitoring for DO and TSS.
 - Collect *E. coli* samples at priority outfalls and at terminus of initial priority areas as part of the Collaborative IDEP Plan by October 30, 2022.
 - Collect tracking metrics data from permittees.
 - Evaluate Metrics A and E.
 - Prepare the Metric Summary and TMDL Monitoring reports.
- Counties (WCDPS)
 - Collect *E. coli* samples at priority outfalls in years 2017 and 2018 and resample priority outfalls in 2022. Provide raw data to ARC staff by October 30, 2022.
 - Keep records of Metrics B, C, D, F, G and H as listed in **Table 8** and provide the data to ARC staff by April 30, 2022.
- Cities and Villages
 - Keep records of Metrics B, C, D, F, G and H as listed in **Table 8** and provide the data to ARC staff by April 30, 2022.
- Townships
 - Keep records of Metrics C, D, F and H as listed in **Table 8** and provide the data to ARC staff by April 30, 2022.
- Schools and Other Permittees
 - Keep records of Metrics D, F and H as listed in **Table 8** and provide the data to ARC staff by April 30, 2022.

Figure 1 – Initial *E. coli* Priority Areas in Wayne County

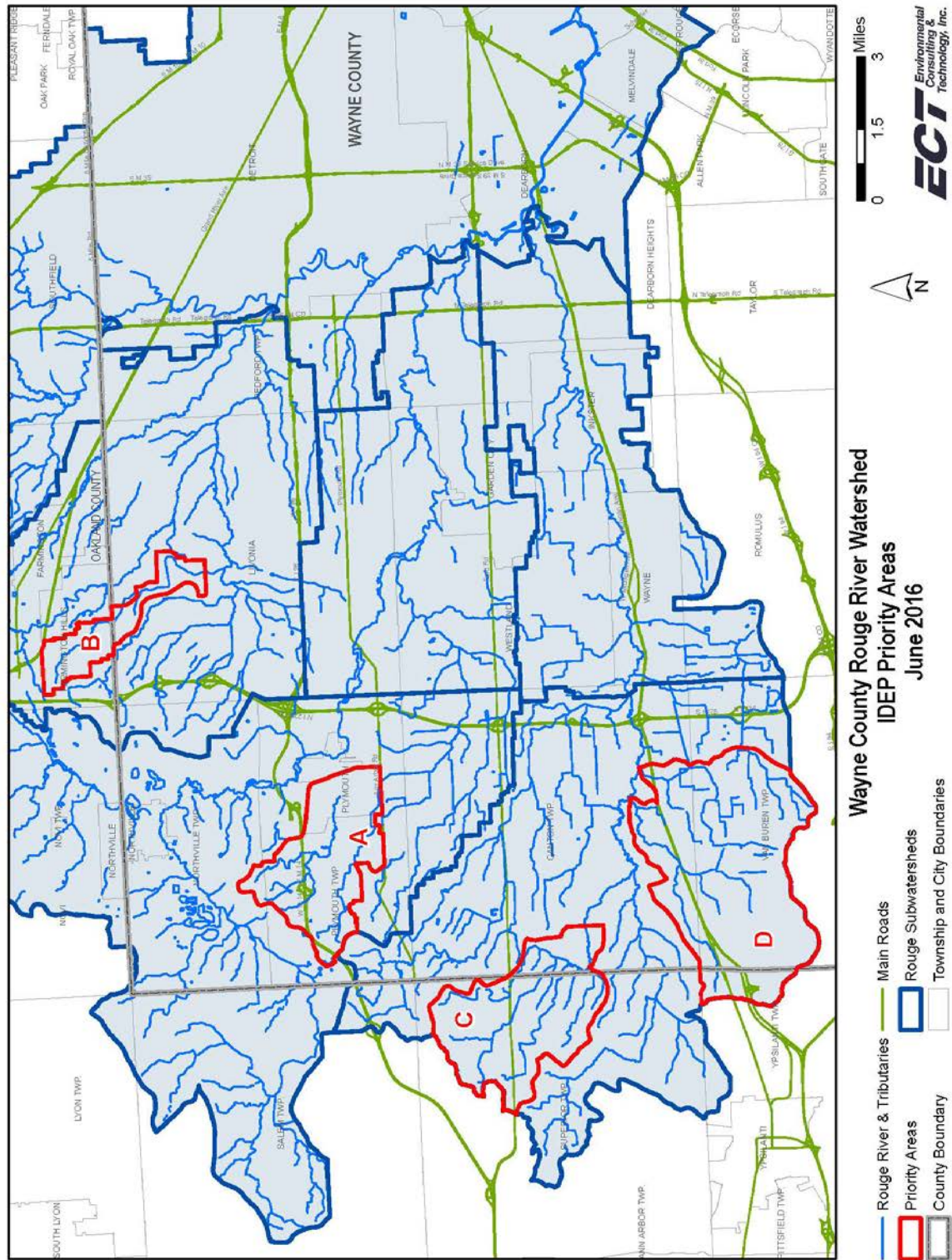


Figure 2 – Initial *E. coli* Priority Areas in Oakland County

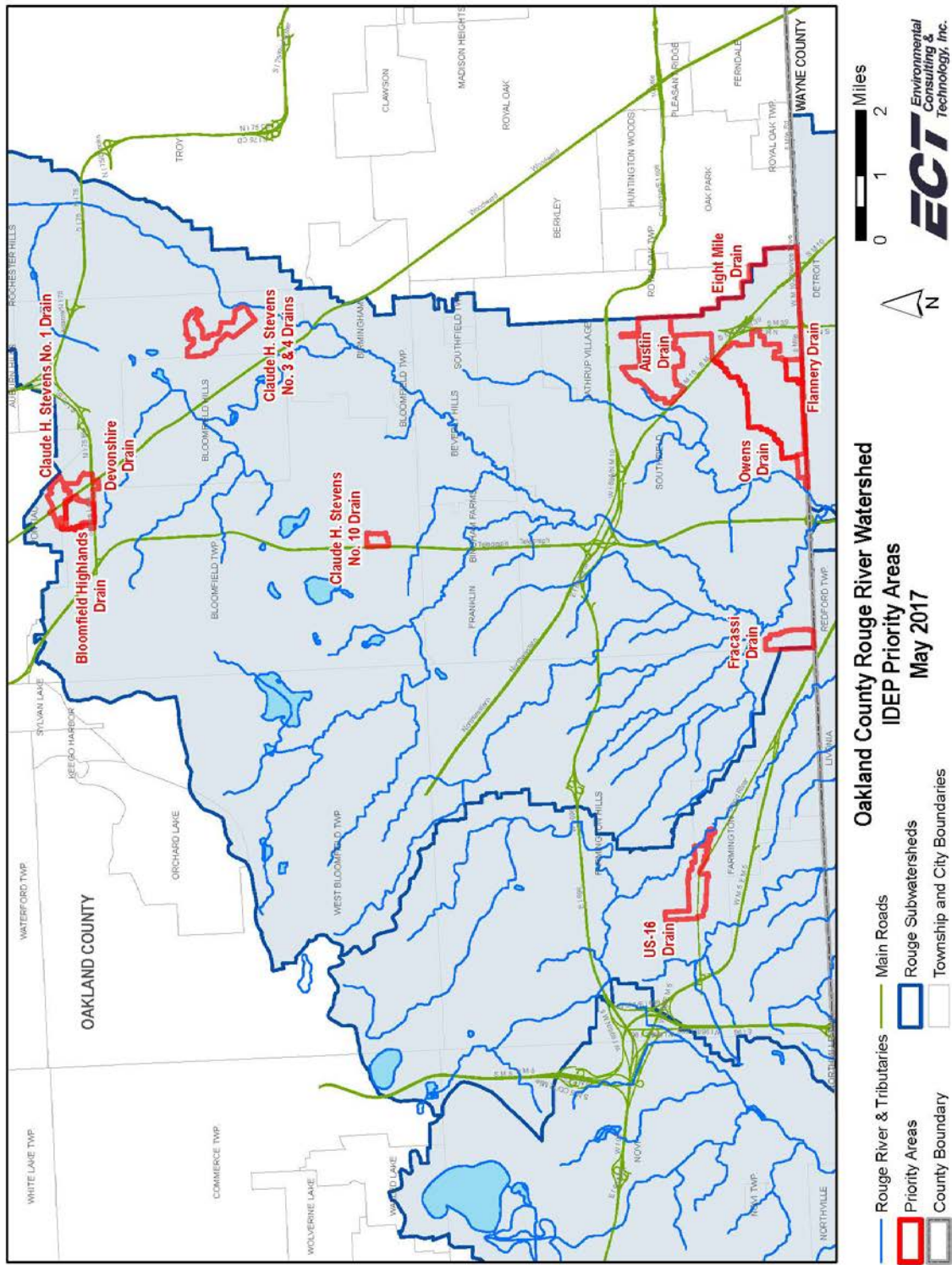


Figure 3. Dissolved Oxygen Levels for Johnson Creek at 7 Mile Road – provisional data

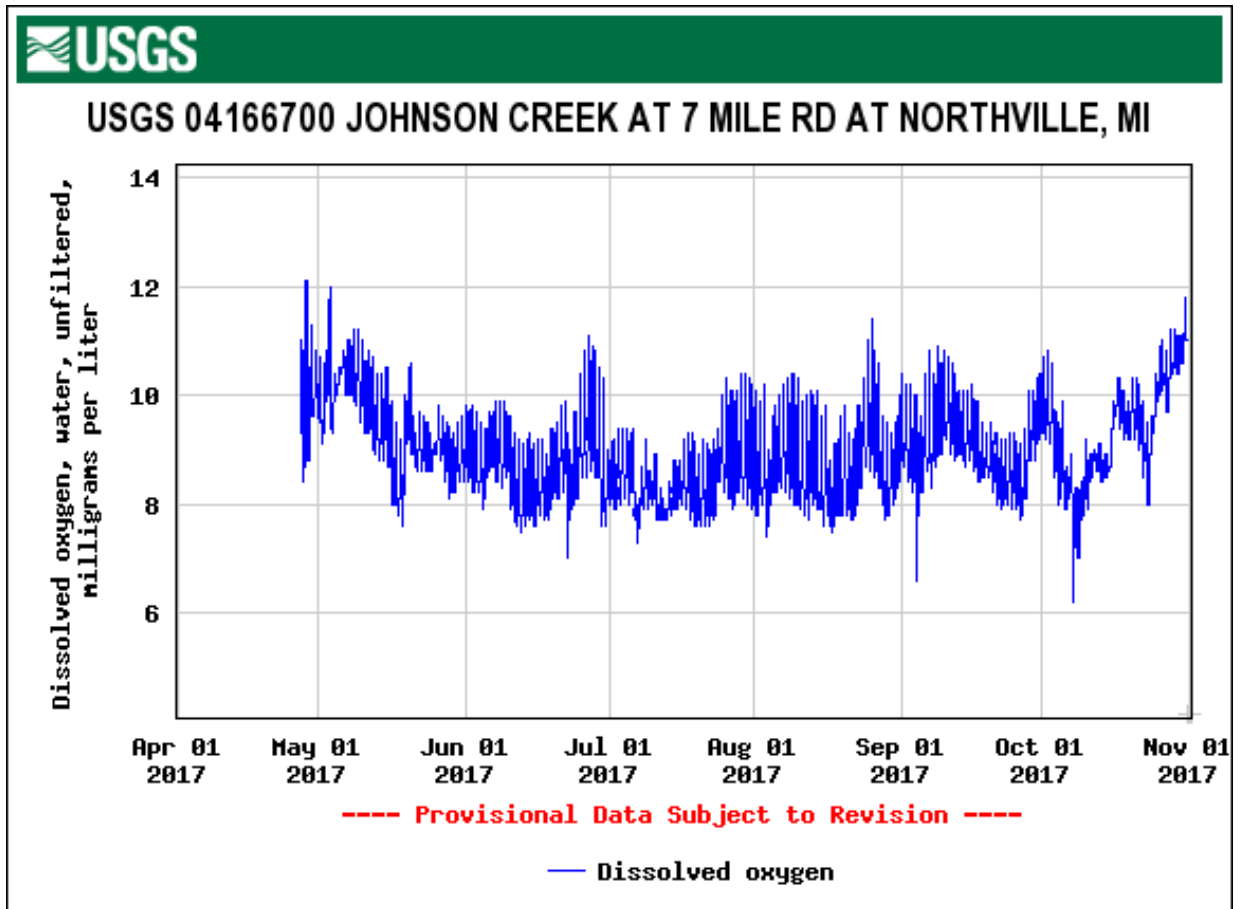
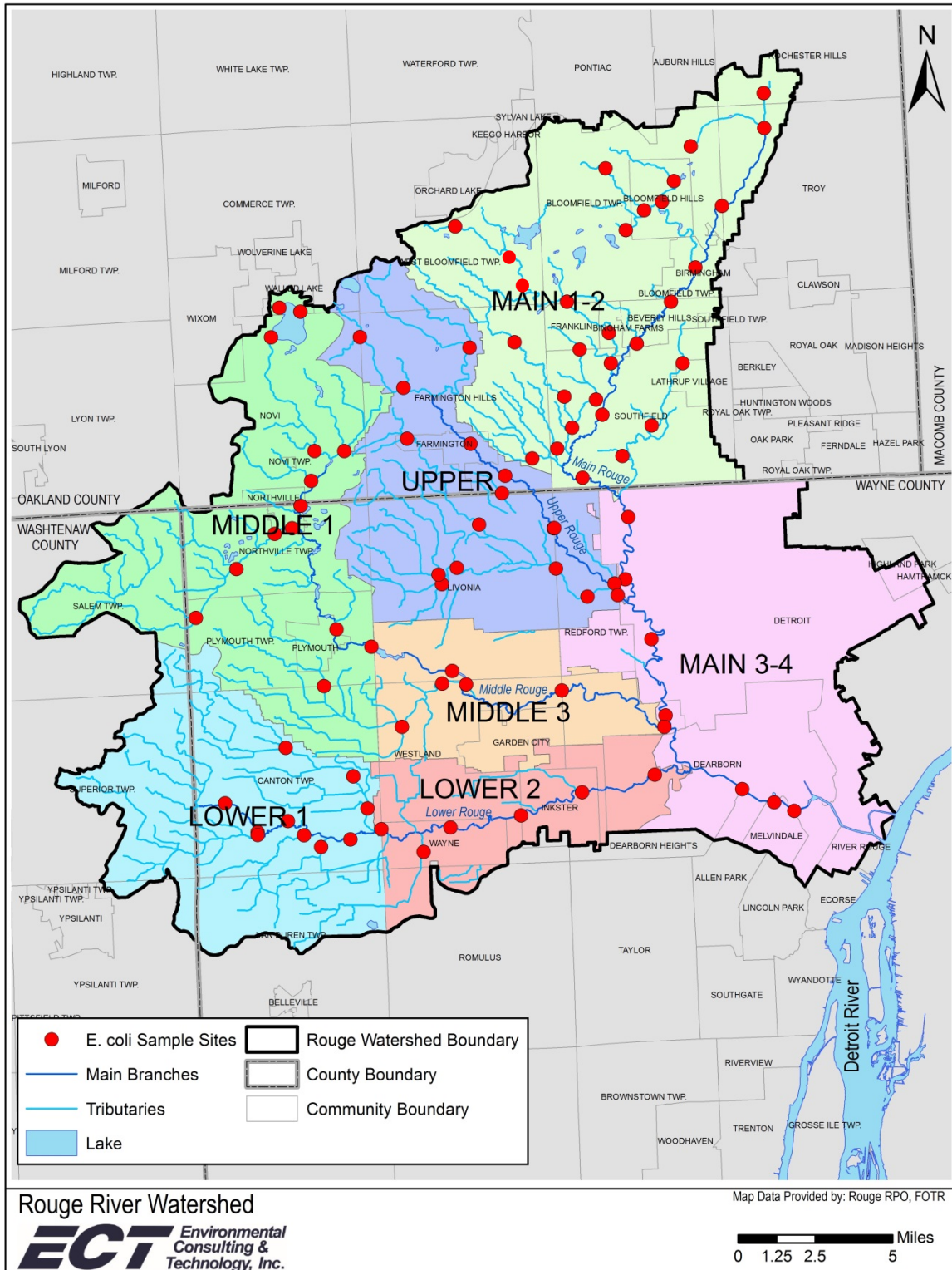


Figure 4 – 2017 (Event 1) TSS Monitoring Locations



E.2. Delisting Criteria

Certain conditions must be met in order to remove the Rouge River from Categories 4a and 5 of the impaired waters list². Conditions that may apply to the Rouge watershed and would justify delisting or recategorization of a waterbody include (MDEQ 2017, Chapter 4.13):

- The source of impairment for the initial designated use support determination was an untreated combined sewer overflow (CSO) and updated information reveals that it has been eliminated or control plan elements have been implemented but data are not yet available to document restoration (recategorized to 4b);
- Reassessment of the waterbody using updated monitoring data or information, techniques, or water quality standards, indicates that the waterbody now supports the designated use (move to Category 1 or 2), or that additional monitoring or information is needed to determine whether the designated use is supported (move to Category 3);
- Reexamination of the monitoring data or information used to make the initial designated use support determination reveals that the decision was either incorrect or inconsistent with the current assessment methodology; and
- Reassessment of a waterbody indicates that the cause of impairment is not a pollutant (recategorized to 4c).

Sampling data must be collected that are at least as rigorous as was originally used to list the waterbody. The sampling requirements and other criteria needed to delist or recategorize waterbodies for an impairment are described below.

E. coli – To be delisted, any known raw sewage discharges must be eliminated (such as untreated CSOs or sanitary sewer overflows (SSOs) and monitoring must prove attainment of water quality standards. This monitoring must be conducted a minimum of 5 weeks with a minimum of 3 samples collected at each location. A 10% exceedance threshold exists for the standards - meaning that up to 10% of the samples can exceed the standard but still meet water quality standards. Both partial and total body contact standards must be met in order for the waterbody to be removed. Additionally, weather conditions must be similar to those used in the original assessment (MDEQ 2017, Chapter 4.7.1.1).

Biota – To be delisted per the Biota TMDL, fish and macroinvertebrate communities must be reestablished so that they receive an ‘acceptable’ or ‘excellent’ rating based on a minimum of two Procedure 51 biological assessments conducted in successive years (MDEQ 2007b). However, the 2016 Integrated Report states that one bioassessment result is generally considered sufficient to make this determination (MDEQ 2017, Chapter 4.6.2.1).

Dissolved Oxygen – To be delisted, time-series samples need to be collected over a period of time that represent wet and dry weather conditions so as to capture environmental variability. As with *E. coli*, a 10% exceedance threshold is applied (MDEQ 2017, Chapter 4.5.1.1).

For any impairment, once a data set is collected that demonstrates that the river is attaining water quality standards, the final decision for delisting is made by MDEQ.

² Waterbodies in Categories 4a and 5 are impaired, but TMDL assessments are complete on 4a waterbodies while TMDL assessment are still needed on Category 5 waterbodies. Once a TMDL assessment is approved by EPA, the impairment is addressed in the next issuance of a MS4’s stormwater permit.

F. References

Alliance of Rouge Communities (ARC). *Rouge River Watershed Management Plan* June 21, 2012.

Hufnagel, C. *1993-1994 Sampling Program Overview*. Rouge River National Wet Weather Demonstration Project Technical Memorandum RPO-SAM-TM43.

Michigan Department of Environmental Quality. *Total Maximum Daily Load for E. coli in the Rouge River, Wayne and Oakland Counties, Michigan*. August 2007a.

Michigan Department of Environmental Quality). *Total Maximum Daily Load for Biota in the Rouge River Watershed including Bishop and Tonquish Creeks, Washtenaw, Wayne and Oakland Counties, Michigan*. August 2007b.

Michigan Department of Environmental Quality. *Total Maximum Daily Load for Dissolved Oxygen in Johnson Creek, Wayne and Washtenaw Counties, Michigan*. June 2007c.

Michigan Department of Environmental Quality. *Water Quality and Pollution Control in Michigan 2016 Sections 303(d), 305(b), and 314 Integrated Report*. January 2017.

Attachment A
Participating ARC Members

Permittee (listed alphabetically)	
Communities	
Beverly Hills, Village of	Northville, City of
Bingham Farms, Village of	Northville Township
Birmingham, City of	Novi, City of
Bloomfield Hills, City of	Oak Park, City of
Bloomfield Township	Plymouth, City of
Canton Township	Plymouth Township
Dearborn Heights, City of	Redford Township
Farmington, City of	Southfield, City of
Farmington Hills, City of	Troy, City of
Franklin, Village of	Walled Lake, City of
Garden City, City of	Wayne, City of
Inkster, City of	Westland, City of
Lathrup Village, City of	West Bloomfield Township
Livonia, City of	
Melvindale, City of	
Counties	
Oakland County*	
Wayne County	
Schools	
Henry Ford College	Schoolcraft College
Other Permittees	
Wayne County Airport Authority – Willow Run Airport	

*Participating but this plan is not part of their pending permit application.

Attachment B
BMP Selection Criteria and Ranking

BMP Selection Criteria and Ranking for TMDL Parameters								Total Score
Ability of the BMP to affect human health impacts caused by direct contact with the river	Ability of the BMP to impact the concentrations of <i>E. coli</i> , suspended solids and/or reduce peak stream flows 0=low, 1=moderate, 2=high	Anticipated level of impact of the BMP as compared to added cost to implement it	Ability to impact multiple TMDL pollutants	Legal authority to implement the BMP? Yes, No	Are there prerequisite projects that need to be completed?	Yes, No		
BMP								
Illicit discharge source identification and abatement	2	2	2	2	Y	N	8	
New Stormwater Ordinance Implementation	0	2	2	2	Y	Y [1]	6	
Green Infrastructure Installation on Public Property	0	1	2	2	Y	Y [2]	5	
PEP Activities: Education on Pollution Complaint Line	1	1	1	2	Y	N	5	
PEP Activities: Don't Feed Waterfowl Signage	1	1	1	1	Y	N	4	
PEP Activities: Septic System Maintenance Education	1	1	1	0	Y	N	3	
PEP Activities: Education on the impacts of Pet Waste	1	1	1	0	Y	N	3	
Good Housekeeping Measures - stockpile management at DPW yards	0	1	2	1	Y	N	4	
Good Housekeeping Measures - catch basin maintenance and street sweeping	0	1	1	1	Y	N	3	
Contractor Education	0	1	1	0	Y	N	2	
Adopt Buffer/Set back ordinances	0	0	1	1	Y	N	2	
PEP Activities: Riparian Corridor Education	0	0	1	1	Y	N	2	
Streambank Stabilization	0	0	1	0	Y (on public property)	Y [3]	1	
Woody Debris Management	0	0	0	0	Y (on public property)	Y [4]	0	
Notes:								
BMPs that will be implemented to address TMDL parameters.								
[1] Pending the adoption of new stormwater standards and a program to implement the standards.								
[2] Pending the adoption of new stormwater standards and funding to implement the standards on permittee properties.								
[3] Pending reduction in stream flows and funding to implement.								
[4] Pending reduction in stream flows.								