



Working together, restoring the river

James W. Ridgway, P.E.  
Executive Director

## AGENDA EXECUTIVE COMMITTEE MEETING

Monday July 30, 2007  
City of Dearborn DPW Office, 2951 Greenfield Road  
1:30 ~ 4:00 p.m.

Allen Park  
Auburn Hills  
Beverly Hills  
Bingham Farms  
Birmingham  
Bloomfield Hills  
Bloomfield Twp.  
Canton Twp.  
Commerce Twp.  
Dearborn  
Dearborn Heights  
Farmington  
Farmington Hills  
Franklin  
Garden City  
Inkster  
Lathrup Village  
Livonia  
Melvindale  
Northville  
Northville Twp.  
Novi  
Oak Park  
Oakland County  
Orchard Lake  
Plymouth  
Plymouth Twp.  
Pontiac  
Redford Twp.  
Rochester Hills  
Romulus  
Southfield  
Superior Twp.  
Troy  
Van Buren Twp.  
Walled Lake  
Washtenaw County  
Wayne  
Wayne County  
Wayne County Airport  
Authority  
West Bloomfield Twp.  
Westland  
Wixom  
Ypsilanti Twp.

1. **Welcome** – Kurt Giberson, Chair
2. **Roll Call of Members** (ECT) and record of others present.

*Alliance of Rouge Communities  
Executive Committee*

<b>Officers</b>		
<b>Chair</b>	<b>Kurt Giberson</b>	Dearborn
<b>Vice-Chair</b>	<b>Gary Mekjian</b>	Southfield
<b>Treasurer</b>	<b>Tim Faas</b>	Canton
<b>Past Vice-Chair</b>	<b>Wayne Domine</b>	Bloomfield Township
<b>Counties</b>		
<b>Oakland Co. – Rep.</b>	<b>John McCulloch</b>	OCDC
Oakland Co. – Alt.	Phil Sanzica	OCDC
Oakland Co. – Alt.	Joseph Colaianne	OCDC
<b>Washtenaw Co.- Rep.</b>	<b>Janis Bobrin</b>	WCDC
Washtenaw Co.- Alt.	Michelle Bononi	WCDC
<b>Wayne Co. - Rep.</b>	<b>Kurt Heise</b>	WCDOE
Wayne Co. - Alt.	Kelly Cave	WCDOE
<b>SWAGs</b>		
<b>Main 1 &amp; 2 - Rep.</b>	<b>Jennifer Lawson</b>	Troy
Main 1 & 2 - Alt.	Meghan Bonifiglio	Bloomfield Township
<b>Main 3 &amp; 4 - Rep.</b>	<b>TBD</b>	
Main 3 & 4 - Alt.	TBD	
<b>Upper - Rep.</b>	<b>Tom Biasell</b>	Farmington Hills
Upper - Alt.	Jim Zoumbaris	Livonia
<b>Middle 1 - Re.</b>	<b>Jill Rickard</b>	Northville Township
Middle 1 - Alt.	Aaron Staup	Novi
<b>Middle 3 - Rep.</b>	<b>Jack Barnes</b>	Garden City
Middle 3 - Alt.	Kevin Buford	Westland
<b>Lower 1 - Rep.</b>	<b>Bob Belair</b>	Canton Township
Lower 1 - Al.	Dan Swallow	Van Buren Township
<b>Lower 2 - Rep.</b>	<b>Ramzi El-Gharib</b>	Wayne
Lower 2 - Al.	Tom Wilson	Romulus

- |  |             |
|--|-------------|
| 3. <b>Summary of April 24, 2007, Executive Committee Meeting</b>                         | Action      |
| 4. <b>Additions or Changes to Draft Agenda</b>   |             |
| 5. <b>Chair Communications</b> (Giberson)  | Information |
| a. Alliance Membership Status  | Information |
| b. Round VIII Grant Awards   | Information |
| 6. <b>Treasurers Report</b> (Faas and WCDOE)   | Information |
| a. 2006-7 Invoicing / Assessment Paid Status   | Information |
| b. 2007 Expenditures / Task Status Report  | Information |
| c. 2008 ARC Budget Preparation Schedule  | Information |
| 7. <b>Executive Director Report</b> (Ridgway)  | Information |
| a. Response from MDEQ re: SWMP Updates   | Discussion  |
| b. TMDL ARC Meeting  | Discussion  |
| c. SEMCOG/Phase II Permit Focus Group<br>(Incentives for Watershed Permit)               | Discussion  |
| 8. <b>Standing Committee Reports</b> (Giberson)  |             |
| a. Finance Committee (Faas)  | Discussion  |
| b. Organization Committee (Heise/Payne – Co-Chairs)                                      |             |
| i. ARC – County In Kind Contributions Policy   | Action      |
| c. PIE (Public Involvement and Education) Committee (Lawson, Chair)                      |             |
| i. Status Report   | Information |
| d. Technical Committee (Zorza, Vice Chair)   |             |
| i. MDEQ SWPPI Template Comments  | Information |
| ii. TMDL Comments  | Information |
| iii. Rouge 5-Year Monitoring Plan  | Information |
| iv. MDEQ / Rouge River RAP Advisory Council (RRAC)<br>Area of Concern Delisting Criteria | Information |
| e. Grants Committee (Sanzica)  |             |
| i. Upcoming MDEQ grants  | Information |
| ii. US-ACOE Rouge River Supplemental   | Information |
| 9. <b>Report from WCDOE</b>  |             |
| a. Rouge Project Update (Cave)   | Information |

**10. Reports from SWAGS (Comments, Concerns, and/or Recommendations)**

- a. Main 1 & 2
- b. Main 3 & 4
- c. Upper
- d. Middle 1
- e. Middle 3
- f. Lower 1
- g. Lower 2

**11. Summary of Executive Committee Actions (Giberson)**

**12. Upcoming Meeting(s)**

Finance Committee Meeting: 1:30 p.m. August 2, 2007 WCDOE Offices, Wayne

PIE Committee Meeting, 1:30 p.m., October 18, 2007, Livonia DPW Offices

Technical Committee Meeting, 1:30 August 21, 2007, Farmington Hills

**Adjourn**

**MEETING SUMMARY  
ALLIANCE OF ROUGE COMMUNITIES  
EXECUTIVE COMMITTEE**

April 24, 2007 2:00 -4:00 p.m.  
Dearborn Dept. of Public Works  
Conference Room  
2951 Greenfield  
Dearborn Michigan

1. **Welcome:** Chair
2. **Roll Call of Members:** Record of members and others present. A quorum was present

**In Attendance:**

Chair:	Kurt Giberson	Dearborn
Vice-chair	Gary Mekjian	Southfield
Treasurer	Tim Faas	Canton Township
Past Vice-Chair	Wayne Domine	Bloomfield Twp.
Wayne County-Rep.	Kurt Heise	WCDOE
Wayne County Alt	Kelly Cave	WCDOE
Oakland County-Alt	Phil Sanzica	OCDC
Main 1-2-Rep	Jennifer Lawson	Troy
Lower 2-Rep	Jack Barnes	Garden City
Lower 2-Alt	Ramzi El-Gharib	Wayne
Upper-Rep.	Tom Biasell	Farmington Hills
Upper-Alt.	Jim Zoumbaris	Livonia
Executive Director	Jim Ridgway	ECT
Middle 3-Alt.	Kevin Buford	Westland
Lower 1-Rep.	Dan Swallow	Van Buren Twp.

**Not In Attendance:**

Washtenaw County-Rep	Janis Bobrin	WCDC
Washtenaw County-Alt	Michelle Bononi	WCDC
Oakland County-Rep.	John McCulloch	OCDC
Oakland County-Alt.	Joe Colaianne	OCDC
Main 3-4-Alt	Mark Kibby	Melvindale
Middle 1-Rep.	Aaron Staup	Novi
Middle 1-Alt.	Jill Rickard	Northville Twp.
Lower 1-Alt.	Bob Belair	Canton Twp.

**Others in Attendance:** ECT Staff, Zachare Ball and Kelly Karll

3. **Approval of January 25, 2007 Meeting Minutes:**

A motion was made to accept the minutes and it was supported. It passed unanimously.

4. **Additions or changes to the Draft Meeting Agenda:**

There were none.

5. **Chair Communications:**

**Grants Committee:** Kurt Giberson reported that the committee, chaired by Phil Sanzica, OCDC, met on April 16, 2007 and focused on whether to use 2008 monitoring funds to pay for updates of the subwatershed management plans in order to be eligible for 319 grants. Jim Zoumbaris, Livonia, said that Jack Bails previously had said the current plans were 319-compliant. Executive Director Jim Ridgway said that MDEQ and EPA audited one of the Rouge subwatershed management plans (Main 3-4) and said we needed to add some information. He said we would need to convince DEQ that our plans are satisfactory. He said he believed we need to modify the plans.

Mr. Giberson said there were two alternatives: Instead of doing monitoring in 2008, use that funding to update plans or if we want to comply with the 3<sup>rd</sup> party audit, apply for a Round VIII RPO grant now. Tom Biasell, Farmington Hills, said he would like to see one permit for the watershed or write all subwatershed management plans the same and make them 319 compliant at the same time.

Jack Barnes, Garden City, wanted to know what effect a one-year sabbatical on monitoring would have. Mr. Ridgway responded that the Rouge is the most monitored watershed in the state and suggested the ARC supplement its monitoring with volunteer monitoring.

Mr. Giberson said if the plans aren't updated now, he is concerned that in a couple of years, there will be no RPO funding, the plans aren't 319 compliant and there is no way to get any money to update the plans.

Kelly Cave, WCDOE, said this year is the fifth year of the Rouge 5-year monitoring plan. The ARC has to develop a monitoring plan for 2008 and beyond, and discuss this plan with MDEQ since the current SWPPIs reference the existing Rouge 5-year monitoring plan. She said the monitoring program is all volunteer-based in the 3 Downriver watersheds in Wayne County. Kelly Karll, ECT, said Clinton River Watershed Council volunteers have successfully been used to do road stream crossing, stream bank erosion surveys, macroinvertebrates and non-point source pollution based on development. She said ECT trained CRWC volunteers to do the various monitoring.

Ms. Cave said her only concern is disrupting the continuous (over 10 years) record of flow and dissolved oxygen monitoring data provided by the USGS at 5 stations in the watershed. Data collected continuously over the long-term allows analysis of trends in the water quality in the watershed. Mr. Ridgway noted that USGS is the only federal agency that can match federal dollars with federal dollars. He said if it is important for the ARC to keep USGS monitoring, then it is important to meet with them now to work it out. Ms. Cave said there are 5 permanent USGS DO stations throughout the watershed. She also noted that the budget for the USGS monitoring is small, compared to the budget for the other monitoring activities for 2007. She agreed with Mr. Ridgway that the USGS should be contacted to explore cost-sharing opportunities. Gary Zorza, Farmington Hills, said that Oakland County is also looking at whether to continue its USGS monitoring. Ms. Cave suggested that the ARC explore whether the continuous data collection could continue at some level, with the remainder of the monitoring funds used to update the subwatershed plans.

Mr. Biasell asked what the Executive Director recommended. Mr. Ridgway said he recommends that the Technical Committee review the monitoring plan and that the ARC ask for a Round VIII RPO grant to update the plans. He said some subwatersheds are going to move forward. He said the Main 1-2 specifically has asked the ARC to submit a Round VIII grant. Ms. Cave said that if all seven subwatersheds want to use Round VIII grant funds for updates the funding would be taken off the top of the total funds available, so applications wouldn't be necessary.

Tim Faas, Canton Twp., said the 2007 monitoring budget is \$330,000. Ms. Cave said the 2008 monitoring budget is \$419,000 including \$29,850 for USGS gages. She said funding is also needed for the annual Rouge River Ecosystem Monitoring and Assessment Report (RREMAR).

Mr. Ridgway said the action items are:

- Update all plans with the intent of ultimately having one plan for the watershed
- Ms. Karll to estimate the types of field work w/costs for the updates
- Get a better price for USGS gages in 2008
- Offer/ask each SWAG if they want to update their plans. If all want to do updates, money will be reserved from the Round VIII grant offering. If only a few want to update, they will be required to submit a grant application to Wayne County. Once this issue has been discussed by all the SWAGs, Wayne County requests notification by the ARC of the intentions of the SWAGs regarding the plan updates as soon as possible.
- Draft a letter to the MDEQ by the June 1 deadline that as of the deadline we are not updating plans.

A motion was made to use the 2008 ARC monitoring budget to update the subwatershed plans. (Motion: Jennifer Lawson, Troy; Second: Kevin Buford, Westland) There was no further discussion and the motion passed unanimously.

**2007 Objectives:** Mr. Giberson reviewed the 2007 Objectives set by the ARC and listed on the agenda.

6. **Treasurer's Report/Finance Committee:** Mr. Faas said that a copy of the Executive Director's contract was attached. He said the previous estimate of a \$55,000 rollover was valid. The 2007 membership invoices have gone out, and some communities have paid.
7. **Other Committee Reports:**
  - a. **Organization Committee (K. Heise/D. Payne, co-chairs):** Mr. Heise said the committee would like to determine what membership costs would be from the member counties and asked that OCDC provide something that outlines current services provided and their costs. Ms. Cave reported that MDEQ is cracking down on permit violations, i.e., reports due, etc. She said MDEQ contacted her to review the Wayne County Storm Water Ordinance.
  - b. **Public Involvement and Education Committee (J. Lawson, Troy, Chair):** Ms. Lawson said three septic system maintenance workshops were held in March which attracted 135 participants. She said the committee is considering offering the workshops every other year, rather than annually. She said this year's monitoring posters will be for the Lower 1 and Lower 2 Subwatersheds. In addition, she said the PIE Committee just mailed out copies of the municipal training fact sheets and posters (from last year's SEMCOG workshop) to each ARC member. The next PIE Committee Meeting will be at 1:30 p.m. April 26, 2007 at Canton Township.
  - c. **Technical Committee (G. Zorza, Chair):** Mr. Zorza said the committee will have to look at what its role will be if there is no 2008 monitoring program.
8. **Report from the Executive Director:** Mr. Ridgway referred to the Strategic Plan outline on the agenda as possible tasks and asked for volunteers for a Strategic Plan Committee. Mr. Domine suggested a representative from each SWAG. Executive Committee Members who volunteered for the committee are: Gary Mekjian, ARC vice-chair; Kurt Heise, WCDOE and Organizational Comm. Chair; Phil Sanzica, OCDC; Jennifer Lawson, Main 1-2 SWAG Representative and PIE Committee Chair; Tom Biasell, Upper SWAG Rep, and Wayne Domine, ARC Past Vice-Chair. Kelly Cave (WCDOE) volunteered for the committee after the meeting.
9. **Report from WCDOE:** All items were discussed previously in the meeting.

- 10. Reports from the SWAGS:** There was nothing to report
- 11. Summary of Executive Committee Actions:**
  - A resolution was adopted to take the 2008 monitoring funds to update the subwatershed management plans to 319 standards.
- 12. Upcoming Meeting Schedule:**
  - PIE Committee, 1:30 p.m. April 26, 2007, Canton Twp.
  - Main 1-2 SWAG, 1:30 p.m. May 8, 2007, Troy Community Center
  - Middle 3/Lower 2 SWAG, 10 a.m. May 9, 2007, Livonia DPW
  - Organizational Committee, 3 p.m. May 11, 2007 Bloomfield Twp.
  - Upper SWAG, (tentative, no time set) May 17, 2007, Livonia DPW
  - Lower 1/Middle 1 SWAG, (no time or location set) May 24, 2007
- 13. Next ARC Executive Committee Meeting:** There wasn't one scheduled.
- 14. Adjourn**



**Alliance of Rouge Communities Status Report  
2007 Fiscal Year  
Updated 7/24/2007**

<b>Community</b>	<b>Cost Allocation [7]</b>	<b>2007 Assessment Paid</b>
<b>Member Communities</b>		
Allen Park	\$759	\$0
Auburn Hills	\$257	\$257
Beverly Hills	\$2,866	\$2,866
Bingham Farms	\$624	\$624
Birmingham	\$3,045	\$3,045
Bloomfield Hills	\$2,522	\$2,522
Bloomfield Twp.	\$16,006	\$16,006
Canton Twp.	\$25,432	\$25,432
Commerce Twp.	\$522	\$522
Dearborn	\$24,214	\$24,214
Dearborn Heights	\$8,912	\$8,912
Farmington	\$2,605	\$2,605
Farmington Hills	\$25,226	\$25,226
Franklin	\$1,453	\$1,453
Garden City	\$6,815	\$6,815
Inkster	\$6,468	\$6,468
Lathrup Village	\$1,220	\$1,220
Livonia	\$29,013	\$29,013
Melvindale	\$2,635	\$2,635
Northville	\$1,758	\$1,758
Northville Twp.	\$9,525	\$9,525
Novi	\$15,628	\$15,628
Oakland County	\$0	n/a
Orchard Lake	\$114	\$114
Plymouth	\$2,210	\$2,210
Plymouth Twp.	\$10,358	\$10,358
Pontiac	\$508	\$508
Redford Twp.	\$12,168	\$12,168
Rochester Hills	\$1,875	\$1,875
Romulus	\$2,075	\$2,075
Southfield	\$18,793	\$0
Superior Twp.	\$7,359	\$7,359
Troy	\$4,395	\$0
Van Buren Twp.	\$6,326	\$6,326
Walled Lake	\$737	\$737
Washtenaw County	\$0	n/a
Wayne	\$5,153	\$5,153
Wayne County	\$0	n/a
West Bloomfield Twp.	\$12,851	\$12,851
Westland	\$20,255	\$0
Wixom	\$528	\$528
Ypsilanti Twp.	\$1,054	\$1,054
<b>Sub Totals</b>	<b>\$294,264</b>	<b>\$250,062</b>
<b>Percent Confirmed</b>		<b>85.0%</b>

<b>Other Items that Affect 2006 Dues</b>		
	<b>Cost Allocation</b>	<b>Balance to Date</b>
Prevoius Years Unused Dues	\$57,351	\$57,351
WCAA	\$2,266	\$2,266
<b>Other Items Total</b>	<b>\$59,617</b>	<b>\$59,617</b>

<b>Total (Assessment and Other Items)</b>	<b>\$353,881</b>	<b>\$309,679</b>
---	------------------	------------------

**Alliance of Rouge Communities Status Report**  
**2007 Fiscal Year**  
**Updated 7/24/2007**

Activity	Budget*	Paid	Remaining Balance
Monitoring Program			
- Baseline Sampling Program	\$281,884	\$73,012	\$208,872
- Rouge Data Dissemination	\$4,000	\$842	\$3,158
- Continuous Monitoring (USGS)	\$29,850	\$14,450	\$15,400
- Lab Services for SWPPI Monitoring	\$12,000	\$4,307	\$7,694
- IDEP	\$35,000	\$7,514	\$27,486
- 5 Year Monitoring Plan (2008-2012)	\$8,000	\$2,868	\$5,132
- Pursue Other Grant Funding Opportunities**	\$115,000	\$0	\$115,000
- Evaluate Data Sharing Opportunities	\$5,000	\$0	\$5,000
Subwatershed Advisory Group Facilitation	\$6,047	\$3,541	\$2,506
Public Education/Involvement Activities			
- Long-Term Planning Efforts for ARC PIE	\$5,000	\$907	\$4,093
- Household Hazardous Waste Committee Facilitation	\$10,000	\$327	\$9,673
- "Measuring Our Success" Posters	\$36,000	\$10,090	\$25,910
- Information Packet for ARC Members/Local Officials	\$7,000	\$2,745	\$4,255
- Two Onsite Sewage Disposal System Workshops	\$5,000	\$4,944	\$56
- Research Financial Sustainability of PIE Programs	\$7,000	\$0	\$7,000
- Radio Ads Promoting Fertilizer Use Awareness	\$2,500	\$2,572	-\$72
- Municipal Training Materials Printing	\$3,000	\$2,042	\$959
Staff Support to Alliance			
- ARC Staff Support	\$116,355	\$58,453	\$57,902
- ARC Insurance (David Chapman Agency)	\$4,140	\$4,100	\$40
- Public Education Committee Support	\$19,859	\$6,993	\$12,866
Total Budgeted	\$712,635	\$199,705	\$512,930
Contingency (Not Budgeted)	\$20,987		
Total Available Funds for 2007	\$733,622		

Amount Paid from Alliance Dues	\$101,903
Amount Paid from Federal Grant	\$97,803

Alliance Dues Received	\$309,679
Alliance Dues Available for Future Bills in FY07 Budget	\$207,776

\* Including approved amendment on March 1, 2007.

\*\* Includes \$65,000 of budgeted future grant amount (currently not in hand)  
It is assumed that match for this \$65,000 future grant is from ARC dues only



**Alliance of Rouge Communities Status Report**  
**Payment Status Report**  
**2007 Budget Year**  
**Updated 7/24/2007**

Vendor	Invoice #	Invoice Amount	Amount Paid	Date Paid	Total per Vendor
Activity: Baseline Sampling Program					
CDM (RPO)	51	\$47,252.98	\$47,252.98	05/25/07	
CDM (RPO)	53	\$14,469.16	\$14,469.16	06/26/07	
CDM (RPO)	54	\$10,587.75	\$10,587.75	7/31/2007	Anticipated
ECT (Executive Director)	072640 (#4)	\$701.70	\$701.70	7/31/2007	Anticipated
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
Subtotal: CDM (RPO)					\$73,011.59
Activity: Rouge Data Dissemination					
CDM (RPO)	51	\$652.44	\$652.44	05/25/07	
CDM (RPO)	53	\$189.62	\$189.62	06/26/07	
CDM (RPO)			\$0.00		
Subtotal: CDM (RPO)					\$842.06
Activity: Continuous Monitoring					
USGS	7-2445-00032 (#1)	\$2,900.00	\$2,900.00	4/23/2006	
USGS	7-2445-00044 (#2)	\$11,550.00	\$11,550.00	7/31/2007	Anticipated
USGS			\$0.00		
USGS			\$0.00		
Subtotal: USGS					\$14,450.00
Activity: Lab Services for SWPPI Monitoring					
E-Lab Analytical	20-0705164-0 (#3)	\$72.00	\$72.00	05/25/07	
Paragon Laboratories, Inc	48776 (#33)	\$45.00	\$45.00	06/26/07	
Paragon Laboratories, Inc	48777 (#34)	\$2,119.50	\$2,119.50	06/26/07	
E-Lab Analytical	20-0705539-0 (#4)	\$72.00	\$72.00	06/26/07	
Paragon Laboratories, Inc	49166 (#36)	\$1,998.00	\$1,998.00	7/31/2007	Anticipated
Paragon Laboratories, Inc			\$0.00		
RTI Laboratories, Inc			\$0.00		
RTI Laboratories, Inc			\$0.00		
RTI Laboratories, Inc			\$0.00		
RTI Laboratories, Inc			\$0.00		
Paragon Laboratories, Inc			\$0.00		
Paragon Laboratories, Inc			\$0.00		
E-Lab Analytical			\$0.00		
Subtotal: Laboratories					\$4,306.50
Activity: IDEP Support					
CDM (RPO)	51	\$7,456.03	\$7,456.03	05/25/07	

CDM (RPO)	54	\$58.05	\$58.05	7/31/2007	Anticipated
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
Subtotal: IDEP Support					\$7,514.08
Activity: 5 Year Monitoring Plan (2008-2012)					
ECT (Executive Director)	072640 (#4)	\$2,867.64	\$2,867.64	7/31/2007	Anticipated
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
Subtotal: CDM (RPO)					\$2,867.64
Activity: Pursue Other Grant Funding Opportunities					
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
Subtotal: CDM (RPO)					\$0.00
Activity: Evaluate Data Sharing Opportunities					
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
Subtotal: CDM (RPO)					\$0.00
<b>Total: Monitoring Program</b>					<b>\$102,991.87</b>
Activity: Subwatershed Facilitation					
CDM (RPO)	53	\$997.50	\$997.50	06/26/07	
ECT (Executive Director)	072639 (#3)	\$2,543.10	\$2,543.10	7/31/2007	Anticipated
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
Subtotal: CDM (RPO)					\$3,540.60
<b>Total: Subwatershed Facilitation</b>					<b>\$3,540.60</b>
Activity: Long-Term Planning Efforts for ARC PIE					
ECT (Executive Director)	072260 (#2)	\$907.45	\$907.45	06/28/07	
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
Subtotal (RPO)					\$907.45
Activity: Household Hazardous Waste Committee Facilitation					
CDM (RPO)	51	\$147.61	\$147.61	05/25/07	
CDM (RPO)	54	\$179.49	\$179.49	7/31/2007	Anticipated
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		



CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
Subtotal (RPO)					\$327.10
Activity: "Measuring Our Success" Posters					
CDM (RPO)	51	\$2,424.24	\$2,424.24	05/25/07	
CDM (RPO)	53	\$3,855.41	\$3,855.41	06/26/07	
CDM (RPO)	54	\$3,810.61	\$3,810.61	7/31/2007	Anticipated
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
Subtotal (RPO)					\$10,090.26
Activity: Information Packet for ARC Members/Local Officials					
Wayne County	2nd Quarter 2007	\$91.97	\$91.97	03/31/07	
CDM (RPO)	51	\$1,476.05	\$1,476.05	05/25/07	
CDM (RPO)	53	\$147.61	\$147.61	06/26/07	
Wayne County	3rd Quarter 2007	\$152.63	\$152.63	06/30/07	
CDM (RPO)	54	\$876.33	\$876.33	7/31/2007	Anticipated
Subtotal					\$2,744.59
Activity: Two Onsite Sewage Disposal System Workshops					
Wayne County	2nd Quarter 2007	\$228.95	\$228.95	03/31/07	
CDM (RPO)	51	\$1,927.20	\$1,927.20	05/25/07	
CDM (RPO)	53	\$1,007.49	\$1,007.49	06/26/07	
Wayne County	3rd Quarter 2007	\$475.00	\$475.00	06/30/07	
CDM (RPO)	54	\$1,305.66	\$1,305.66	7/31/2007	Anticipated
Subtotal: CDM (RPO)					\$4,944.30
Activity: Research Financial Sustainability of PIE Programs					
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
Subtotal: CDM (RPO)					\$0.00
Activity: Radio Ads Promoting Fertilizer Use Awareness					
Wayne County	2nd Quarter 2007	\$76.32	\$76.32	03/31/07	
Wayne County	3rd Quarter 2007	\$2,495.23	\$2,495.23	06/30/07	
Subtotal: CDM (RPO)					\$2,571.55
Activity: Municipal Training Materials Printing					
Wayne County	2nd Quarter 2007	\$686.71	\$686.71	03/31/07	
Wayne County	3rd Quarter 2007	\$1,354.79	\$1,354.79	06/30/07	
Subtotal (RPO)					\$2,041.50
<b>Total: Public Involvement &amp; Education Committee Support</b>					<b>\$23,626.75</b>
Activity: Staff Support					
CDM (RPO)	51	\$14,639.39	\$14,639.39	05/25/07	

CDM (RPO)	53	\$353.90	\$353.90	06/26/07	
ECT (Executive Director)	072271 (#1)	\$28,437.33	\$28,437.33	06/28/07	
ECT (Executive Director)	072639 (#3)	\$15,022.46	\$15,022.46	7/31/2007	Anticipated
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
Subtotal (RPO)					\$58,453.08
Activity: ARC Insurance					
David Chapman Agency	203285	\$4,100.00	\$4,100.00	1/16/2007	
Subtotal Insurance					\$4,100.00
Activity: Public Education Committee Support					
CDM (RPO)	53	\$5,000.10	\$5,000.10	06/26/07	
ECT (Executive Director)	072639 (#3)	\$1,992.80	\$1,992.80	7/31/2007	Anticipated
CDM (RPO)			\$0.00		
CDM (RPO)			\$0.00		
Subtotal					\$6,992.90
<b>Total: ARC Staff Support</b>					<b>\$69,545.98</b>
<b>TOTAL</b>					<b>\$199,705.20</b>

**NOTES:**

- (1) Payments for services provided and costs incurred against the 2007 budget.
- (2) There are additional funds which have been expended against the 2007 budget which have not yet been billed/paid.  
There is a delay of 30 to 60 days between expenditure and payment.



**Alliance of Rouge Communities 2007 Task Status**  
 Revised: July 25, 2007

ARC 2007 Budget Items		Approved 2007 Budget	Staff	Task Status
<b>Organization Committee</b>				
OC1	Staff Support	\$116,355	ED Services/RPO	Staff support to Alliance and standing committees. Includes: meeting coordination, reporting, administrative support, information preparation and dissemination, and maintenance of ARC web site. STATUS: Continued maintenance of ARC member distribution lists and web site. Executive Committee meeting on 1/25/07 and Full ARC meeting on 3/1/07. Finalized contract with new Executive Director. Transferred ARC electronic files to FTP site for transition to new Executive Director and delivered hard copies. Met with ARC representatives and discussed logistical procedures. Worked with representatives to strategize on upcoming issues of concern related to the new Phase II permit, the Comstock/Kalamazoo decision, SEMCOG's efforts with the Bolt decision, updating the current watershed management plans and responding to MDEQ SWPPI comments. Prepared for Organizational meeting to be held 5/11/07, but which was cancelled. Prepared and submitted letter on behalf of all ARC representatives to MDEQ indicating not updating Rouge Watershed Plans at this time.
				Prepared for and attended Finance Committee. Prepared for, attended and summarized ARC Executive Committee meeting (4/24/07). Prepared and sent out email meeting notices to all ARC members/guests to update all committee participants. ED contacted MDEQ regarding permits and TMDLs. ED had various meetings and discussions with USCOE. ED met with D. Drullinger and N. Mullett. Prepared for ARC TMDL meeting (6/27/07). Cable interview with ED. ED attended meetings with the Alliance of Downriver Watersheds and the Great Lakes Alliance. Reviewed Wayne County Storm Water Summary. Met with T. Faas in Canton to view the ARC video that Canton taped for its cable network and for distribution to ARC communities.
OC1.2	Public Education Committee Support	\$19,859	ED Services/RPO	STATUS: PIE Committee meetings were held on January 16, 2007 in Southfield; April 26, 2007 in Canton Twp., and July 12, 2007 in Beverly Hills. The next PIE Committee Meeting is 1:30 p.m. October 18, 2007 in Livonia.
OC2.a	ARC Insurance	\$4,140	Outside Purchase	STATUS: Completed
OC2.b	Fiduciary Services	---	Wayne County	STATUS: ongoing
OC3	Subwatershed Advisory Group Facilitation	\$6,047	ED Services/RPO	a) Sub-watershed Advisory Group (SWAG) meeting facilitation and coordination STATUS: ARC Grants subcommittee on 1/9/07 to discuss grant funding to update SWMPs. Discussions with MDEQ about applying for 319 grant to update the plans. Grants subcommittee meeting on 1/25/07 at OCDC. Coordination with SWAG facilitators on compilation of SWAG electronic files and transition to ARC Executive Director. Coordinated with SWAG reps via phone and email to discuss topics for upcoming SWAG meetings. Prepared for, attended and prepared meeting summary for the following subwatershed meetings: Main 3-4 (3/9/07); Main 1-2 (5/8/07); Upper (5/17/07); Lower1/Middle1 (5/24/07); Middle 3/Lower 2 (5/9/07). Drafted Round VIII Ranking letters for subwatershed groups.
<b>Organization Committee Total</b>		<b>\$146,401</b>		
<b>Public Involvement and Education Committee</b>				
PIE2	Long-Term Planning Efforts for ARC PIE	\$5,000	ED Services	Staff support to the PIE Committee to develop a five-year plan for public involvement and education activities for the Alliance of Rouge Communities STATUS: The PIE Planning Committee is meeting August 2, 2007 in Troy to discuss activities and budget items for 2008.
PIE3	Household Hazardous Waste Committee Facilitation	\$10,000	RPO	HHW initiative in the Rouge River Watershed in 2007. STATUS: 2007 HHW dates in ARC communities was compiled. 2007.The HHW Subcommittee is meeting on August 7, 2007 in Bloomfield Township.
PIE4	Measuring Our Success Posters	\$36,000	RPO	Create posters for the Lower 1 and Lower 2 subwatersheds highlighting progress towards SWPPI goals. STATUS: The Lower 1 and Lower 2 draft posters are currently out for review. They are scheduled to be completed by October, 2007.
PIE5	Fertilizer Education Pilot Program	---	None	Conduct a fertilizer education pilot program. STATUS: This Program will not be conducted in 2007 under the ARC Activities.
PIE6	Information Packet for ARC Members/Local Officials	\$7,000	RPO/Wayne County	STATUS: Continued to fill orders for PE materials. Meeting with WC to discuss remaining mailings is scheduled for August, 2007. Topics this year have included municipal facilities maintenance and the ARC CD developed by Canton Township.
PIE7	Two Onsite Sewage Disposal Workshops	\$5,000	RPO/Wayne County	Preparation of materials for two OSDS workshops. STATUS: OSDS Workshops were held on March 8, 2007 in Livonia (23 attendees); March 15, 2007 in Van Buren Township (36 attendees) and March 22, 2007 in Farmington Hills (76 attendees). The Bloomfield Township workshop set for March 29, 2007 was canceled due to minimal response, and interested residents were directed to the Farmington Hills workshop. Task Complete.
PIE8	Research Financial Sustainability of PIE Programs and SWPPI Implementation	\$7,000	ED Services	STATUS: Ongoing
PIE9	Radio Ads Promoting Fertilizer Use Awareness	\$2,500	Wayne County	STATUS: Radio Ads have all been aired. Task is complete.
PIE10	Municipal Training Materials Printing	\$3,000	Wayne County	STATUS: Printing and distribution of the Municipal Garage posters and fact sheets has been completed. Task I is complete.
<b>PIE Committee Total</b>		<b>\$75,500</b>		
<b>Technical Committee</b>				



## Alliance of Rouge Communities 2007 Task Status

Revised: July 25, 2007

ARC 2007 Budget Items		Approved 2007 Budget	Staff	Task Status
TC1	Baseline Sampling Program	\$281,884	ED Services/RPO	a) SWPPI monitoring in the Main 3-4 Subwatershed (15 dry weather events at 3 locations and 5 wet weather events at 3 locations). <b>STATUS:</b> 2 wet weather events and 8 dry weather events have been monitored. Event summaries are complete for 5 of the dry weather surveys and 2 of the wet weather surveys.
				b) Planning for 2007 monitoring season; includes development/approval of field sampling plan and standard operating procedures. <b>STATUS:</b> Field Sampling Plan and Standard Operating Procedures (SOPs) were updated for 2007 and approved by USEPA. Sampling planning including field equipment maintenance was completed.
				c) Technical assistance to Technical Committee (TC) and SWAGs. <b>STATUS:</b> Coordinated with the Main 3-4 SWAG to select sampling locations, including preparation of data summary presentations of past monitoring results. Meeting with Technical Committee chair to review goals and objectives for new monitoring program.
				<b>STATUS:</b> ARC members attended a TMDL stakeholder meeting on 6/25/07 held by MDEQ to discuss the pathogen and biota TMDL reports
				d) Loading and processing of all data (including USGS, Rainfall, and data funded/collected by others in support of Rouge Project) into the Rouge sampling database, including QA/QC review and interpretive analysis. <b>STATUS:</b> Data is loaded as received. Data collected from other agencies in 2006 (FOTR, MDEQ, Wayne County Health Dept.) has been formatted and loaded. 2007 monitoring data are being reviewed and processed for loading as they are received from the laboratory, USGS, Wayne and Oakland Counties. Approximately 25% of the laboratory data has been reviewed and formatted, but has not been loaded. Approximately 25 % of the USGS data has been loaded.
				e) Annual Rouge River Eco-system Monitoring and Assessment report (2006 data). <b>STATUS:</b> 2005 report has been completed and is published on the Rouge River website. Preparation of the 2006 report is on-going.
TC2	Rouge Data Dissemination (WebView)	\$4,000	RPO	Update the on-line database to include 2006 final data. <b>STATUS:</b> Updated and exported newly loaded data to Dataview-type datasets for 2006.
TC3	Lab Services	\$12,000	Paragon / E-Lab	Laboratory analysis of wet and dry event samples. <b>STATUS:</b> Coordination with laboratory regarding start up of sampling activities for 2007 has been completed. On-going coordination during dry and wet event sampling. Data undergoes preliminary review as results are received. Laboratory invoices are reviewed and forwarded to Wayne County as they are received.
TC4	IDEP	\$35,000	RPO	<b>STATUS:</b> Cover letter for IDEP report placed on ARC letterhead and submitted to Technical Committee Chair for signature and mailing to MDEQ. The annual SWPPI report template task is proposed to be postponed until 2007, after comments are received from the MDEQ on SWPPI updates.
TC5	Continuous Monitoring	\$29,850	USGS	a) Continuous monitoring of dissolved oxygen and temperature at 2 locations from May through October. <b>STATUS:</b> USGS has installed the dissolved oxygen and temperature monitoring equipment and was operational prior to May 1, 2007. On-line Real-time data is reviewed in preparation for dry and wet events and is available at <a href="http://waterdata.usgs.gov/nwis">http://waterdata.usgs.gov/nwis</a>
				b) Continuous monitoring of water level/flow at 7 locations and level only at 1 location from May through October. (2 stream level/flow locations on the Main Rouge River at Plymouth Road (funded by USGS) and Rotunda Drive (funded by ARC/RPO) and acquisition of data from the remaining 6 gages (funded by the USGS)) <b>STATUS:</b> Equipment installed and operational prior to May 1, 2007. On-line Real-time data is reviewed intermittently in preparation for dry and wet events and is available at <a href="http://waterdata.usgs.gov/nwis">http://waterdata.usgs.gov/nwis</a> .
				c) Spring installation/fall removal of equipment, regular maintenance of sampling sites and field equipment, data processing and calibration adjustments. <b>STATUS:</b> Water quality sondes have been installed, are operational, and undergo routine maintenance
TC6	5 Year Monitoring Plan	\$8,000	ED Services/RPO	<b>STATUS:</b> Recommendations for continued/reduced sampling for the next five years were summarized for the Technical Committee based on a review of sampling results from the current five year monitoring program. ED met with WC staff to review current volunteer monitoring programs and discuss suggested volunteer monitoring activities for new 5-year program. Reviewed current FOTR programs and site locations. Researched/reviewed the CityGreen infrastructure modeling program for potential integration into the 5-year program. <u>Developed goals/objectives for new 5-year program.</u>
TC7	Pursue Other Grant Funding Opportunities	\$115,000	ED Services/ Future Grant	<b>STATUS:</b> Prepared summary of grant funding opportunities.
TC8	Evaluate Data Sharing Opportunities	\$5,000	ED Services	<b>STATUS:</b> did not start
<b>Technical Committee Total</b>		<b>\$490,734</b>		
<b>Total 2007 ARC Budget</b>		<b>\$712,635</b>		



## 2008 ARC BUDGET PREPARATION SCHEDULE

<u>Date</u>	<u>Action Item</u>
7/06/07	Executive Officers agree on budget target of "no increase in member dues" for the 2008 ARC Budget.
7/18/07	Treasurer to distribute 2008 ARC Budget Schedule
7/19/07	Treasurer to send out letter to ECT requesting cost proposal for Executive Director Services to the Finance Committee by 8/24/07.
7/19/07	Treasurer to send out letter to the PIE and Technical Committees requesting budget submittals to the Finance Committee by 8/31/07.
7/31/07	Executive Officers to decide on who should provide fiduciary services in 2008 (i.e. Wayne County DOE or ECT).
8/24/07	Receive cost proposal from ECT and distribute to Executive Committee
8/31/07	Receive budget proposals from PIE and Technical Committees
9/06/07	Finance Committee Meeting to receive draft budget information
10/04/07	Executive Committee Meeting (TENTATIVE) to narrow budget target
11/01/07	Finance Committee Meeting to finalize budget proposals and formulate recommendation to the Executive Committee
11/15/07	Executive Committee Meeting to review the proposed budget.
12/06/07	Full Alliance Meeting to adopt the 2008 ARC Budget.



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



STEVEN E. CHESTER  
DIRECTOR

June 7, 2007

Mr. James W. Ridgway, Executive Director  
Alliance of Rouge Communities  
C/O ECT  
719 Griswold, Suite 1040  
Detroit, MI 48226

Dear Mr. Ridgway:

SUBJECT: Update of Rouge Watershed Management Plans  
Municipal Separate Storm Sewer System (MS4) General Watershed Permit  
National Pollutant Discharge Elimination System (NPDES)

On May 29, 2007, the Department of Environmental Quality (DEQ), Water Bureau (WB), Southeast Michigan and Jackson District Offices, received notification from the seven Rouge Storm Water Advisory Groups indicating that the seven Rouge Subwatershed Management Plans (WMPs) will not be updated at this time. WB staff reviewed this document to determine compliance with the conditions of the MS4 General Permit No. MIG619000 and the individual Certificates of Coverage.

MDEQ understands that many long term goals and short term objectives stated in the 2001 WMPs have not yet been achieved; however MDEQ is concerned about the outdated community commitment tables in the 2001 WMPs. MDEQ does understand that funding to update the seven WMPs is currently being sought and that the watershed groups plan to update the seven Rouge WMPs by November 2008.

Therefore, MDEQ approves postponing Rouge WMP updates at this time with the understanding that the plans will be updated by November 2008. Please contact MDEQ if the subwatershed groups are unable to update the WMPs by 2008 to discuss how to address outdated portions of the 2001 plans.

In the meantime, MDEQ expects the Rouge Communities to continue work towards achieving the goals, objectives and actions in the current watershed plans. Please ensure that all actions committed to by the individual communities in the watershed plans continue to be included in the storm water pollution prevention initiatives (SWPPIs), and that next steps and updated dates are also included where applicable when a stated action has been completed.

Thank you for your continuing commitment to protecting and improving the water resources of the state. The work that you have done as part of the Rouge River Watershed is commendable. If you have any questions or concerns regarding the Rouge subwatershed management plans or would like to arrange a meeting with WB to discuss implementation of the program, please contact Betsy Nightingale at 586-753-3794 or [nightine@michigan.gov](mailto:nightine@michigan.gov) (for MDEQ Southeast District Communities), Rachel Matthews at 517-780-7917 or [matthewr@michigan.gov](mailto:matthewr@michigan.gov) (for MDEQ Jackson District Communities).

Sincerely,

Hae-Jin Yoon  
District Supervisor  
Southeast Michigan District Office  
Water Bureau

cc: Betsy Nightingale, WB  
Patricia Huddas, WB  
Martin Hendges, WB  
Bretton Joldersma, WB  
Rachel Matthews, WB

File/MS4/ /Compliance:

Allen Park MS4-Wayne  
Auburn Hills MS4-Oakland  
Avondale PS MS4-Oakland  
Beverly Hills MS4-Oakland  
Bingham Farms MS4-Oakland  
Birmingham MS4-Oakland  
Bloomfield Hills MS4-Oakland  
Bloomfield Twp MS4-Oakland  
Canton Twp MS4-Wayne  
Commerce Twp MS4-Oakland  
Dearborn Heights MS4-Wayne  
Dearborn MS4-Wayne  
Farmington Hills MS4-Oakland  
Farmington MS4-Oakland  
Franklin MS4-Oakland  
Garden City MS4-Wayne  
Inkster MS4-Wayne  
Lathrup Village MS4-Oakland  
Livonia MS4-Wayne  
Lyon Twp MS4-Oakland  
Melvindale MS4-Wayne  
Northville MS4-Oakland  
Northville Twp MS4-Wayne  
Novi MS4-Oakland  
Oak Park MS4-Oakland  
Oakland Co MS4  
Orchard Lake MS4-Oakland  
Plymouth MS4-Wayne  
Plymouth Twp MS4-Wayne  
Plymouth-Canton PS MS4-Wayne  
Pontiac MS4-Oakland  
Redford Twp MS4-Wayne  
Rochester Hills MS4-Oakland  
Rochester PS  
Romulus MS4-Wayne  
Southfield MS4-Oakland  
Superior Twp MS4-Washtenaw  
Troy MS4-Oakland  
Van Buren Twp MS4-Wayne  
W Bloomfield Twp MS4-Oakland  
Walled Lake MS4-Oakland

Washtenaw CDC MS4  
Washtenaw CRC MS4  
Wayne Co MS4  
Wayne MS4-Wayne  
Westland MS4-Wayne  
Willow Run Airport MS4  
Wixom MS4-Oakland  
Ypsilanti Twp MS4-Washtenaw



*James W. Ridgway, P.E.*  
*Executive Director*

Allen Park  
Auburn Hills  
Beverly Hills  
Bingham Farms  
Birmingham  
Bloomfield Hills  
Bloomfield Twp.  
Canton Twp.  
Commerce Twp.  
Dearborn  
Dearborn Heights  
Farmington  
Farmington Hills  
Franklin  
Garden City  
Inkster  
Lathrup Village  
Livonia  
Melvindale  
Northville  
Northville Twp.  
Novi  
Oak Park  
Oakland County  
Orchard Lake  
Plymouth  
Plymouth Twp.  
Pontiac  
Redford Twp.  
Rochester Hills  
Romulus  
Southfield  
Superior Twp.  
Troy  
Van Buren Twp.  
Walled Lake  
Washtenaw County  
Washtenaw County  
Commission  
Wayne  
Wayne County  
Wayne County Airport  
Authority  
West Bloomfield Twp.  
Westland  
Wixom

July 24, 2007

Ms. Brenda Sayles  
MDEQ  
Water Bureau  
P.O. Box 30273  
Lansing, MI 48909

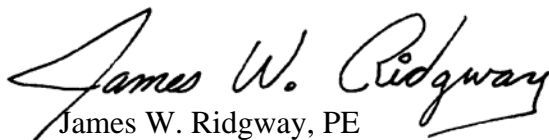
Dear Ms. Sayles:

The Alliance of Rouge Communities thanks you for the opportunity to comment on the Draft TMDLs for the Rouge River. Our specific comments are attached to this letter. We would also request a second meeting with your staff to further discuss the TMDL and how it will impact our communities in the future. Your staff has been extremely cooperative and forthcoming with information as we requested it. We are concerned, however, that the regulatory burden that may result from this analysis is inappropriately placed upon the communities; the same communities that have invested hundreds of millions of dollars to make the progress we have enjoyed to date.

Once you have had the opportunity to review our comments, we would ask that you allow us to further discuss these important matters with you. I can be reached at 313-963-6600.

Sincerely,

**ALLIANCE OF ROUGE COMMUNITIES**

  
James W. Ridgway, PE  
Executive Director

**A compilation of verbal comments from the ARC Technical Committee Meeting held on July 17<sup>th</sup> and written comments supplied by WCDOE, Northville Twp and the Alliance of Rouge Communities (ARC)**

*General Comments*

1. What is the purpose of the Reasonable Assurance section? Please explain in the document.
2. What is the source of the land use data for each of the TMDLs? The most recent data from SEMCOG should be utilized. The land use data should be divided by community, so that each community can determine how their current land uses vary from the most recent SEMCOG data (this is especially important for rapidly developing communities).
3. Each of the TMDLs assumes that the MS4 permittees have control over the stormwater discharges from residential and commercial areas within their jurisdiction. However, many of these systems are privately owned. How will the state enforce the proposed limits on these private systems and for the MS4s?
4. In the MDEQ presentation it was noted that TMDL numeric allocations were not going to be assigned to individual MS4 permittees. MDEQ Permit staff have made statements to the effect that the “TMDL’s will be rolled into the individual MS4 permits”. Within each TMDL document there should be a statement that clarifies that the numeric TMDL allocations will not be assigned to each MS4 permit but that cumulatively through the iterative watershed management storm water permit process it is anticipated that the TMDL targets will be met. *Note:* Watershed-Based Storm Water Permit indicates that the Watershed Management Plans are to address TMDL concerns it does not require that individual permittees address them in their SWPPI’s nor does it authorize MDEQ staff to place numeric targets into the individual permittee certificates of coverage.
5. Is there a difference in the terms suspended sediment (SS) (from the DO TMDL) and the total suspended solids (TSS) (from the Biota TMDL)?

*TMDL for E. coli for the Rouge River Watershed*

Content Comments

6. The water quality goal for the *E. coli* TMDL is 300 cfu/100mL, regardless of flow conditions. The ARC is concerned that this goal is unrealistic as no urbanized area across the country can meet it, especially during wet weather conditions. Is it possible to at least use the partial body contact standard of 1,000 cfu/100mL for wet weather periods?
7. Can the MDEQ clarify the term ‘daily maximum’ when referring to the daily geometric mean. Does the daily maximum refer to the highest *E. coli* concentration for a given day? Or does the daily maximum refer to the geometric mean of a set of 3 or more values and that geometric mean must be lower than 300 cfu/100mL? If the later is the case, then it may be clearer to call it the daily geometric mean, and not the daily maximum.
8. It is not clear why the Upper and Main Branches were not assigned non-point loads, when the Lower (35%) and Middle (46%) were assigned non-point source loads. Is this based on what is considered the urbanized area? If so, can you please provide an explanation and map showing this area.
9. For each watershed, what was the number of acres used to calculate the daily load for the industrial storm water permits? How was this acreage derived?

10. Most industrial stormwater permits do not have *E. coli* limits associated with them (and therefore they are not required to do *E. coli* monitoring), so how can it be said that they are (or are not) in compliance with the water quality goal.
11. Will the communities be required to calculate an *E. coli* load in order to determine compliance with the TMDL?
12. If pollutant reduction goals from the TMDLs are rolled into the stormwater permit, how will enforcement be done? The waste allocations for industrial storm water permitted facilities are based on a model, utilizing land use types, soil conditions, rainfall, etc. WWTPs and CSO basin allocations are based on existing permit limits. We are concerned that enforcement may fall upon the MS4s. A significant challenge to the MDEQ is how to allocate to different MS4s. If MDEQ uses the land use model, it will not reflect BMPs (e.g. dog waste ordinance, septic inspection program, effective IDEP, etc.) that a community has implemented to decrease *E. coli* levels. How will the MDEQ handle counties that cover the same geographical area as other MS4 permittees?
13. It would be helpful to define the waste load allocation (WLA) prior to page 38.
14. Can a map be provided that shows the location of the known SSOs, CSOs and WWTPs and the sampling locations?

#### Typographical Errors

15. There is an inconsistency with the conversion value for fecal coliform counts to *E. coli* counts: 77% is listed on p. 39 and 71% is listed in Table 16. Which was used?
16. In Section 8, there is reference to a concentration based TMDL. Is this a typo?
17. The units for *E. coli* appear to be incorrect in Section 3.1.
18. Page 58, Table 26 “Westland passed an ordinance....septic systems within the City”.
19. Tables 15, 17, 19 and 21, should use the word high not “hi”.

#### *TMDL for Dissolved Oxygen for Johnson Creek*

##### Content Comments

20. Much of the data in the Data Discussion Section appears to be for the upper portion of the watershed, which is not part of this TMDL. Can this data and the subsequent discussion be deleted or put into an appendix, so as not to confuse the reader?
21. How does the 6 mg/L limit referred to in subsection 2(a) of R 323.1064 apply to Johnson Creek? If so, can it be used in determining compliance in the TMDL?
22. The dissolved oxygen (DO) data used to determine compliance with the 7 mg/L water quality standard is at best over 6 years old. More recent data should be collected to assess current conditions, as this is a rapidly developing area of the Rouge River watershed.
23. The pattern of intermittent but persistently recurring periods of DO less than 7 mg/l may have always existed in Johnson Creek. Has the MDEQ considered this?

24. It would be beneficial to see a little more detail on the 43,895 pieces of DO data collected at 7 Mile Road. How many samples were taken each year and what was the percent exceedence from year to year? Is there an upward or downward trend associated with the data from year to year?
25. How far back in time should the MDEQ consider water quality data for compliance purposes?
26. There is concern that the lower portion of Johnson Creek is subject to extremely low flows, like the upper portion. Can the MDEQ provide more information on the extent of the flow measurements presented in Appendix A? How many measurements were taken? Over what time period?
27. The TMDL assumes that the suspended sediment loads from the commercial and residential land uses are split equally between construction sites, MS4s and other residential and commercial not covered by a permit. What information is this assumption based on? Is this on a per acre basis or total load throughout the watershed?
28. What is the equivalent concentration for the 5 lb/day suspended sediment limit for the MS4s? The MS4s will need this information if they are to measure progress.
29. From the document, 84% of the SS load is from non-point sources and 3% is from MS4 permits. It does not seem reasonable to require 3% of the problem to do something when it isn't clear how 84% of the problem will be addressed. In other words, until substantive progress can be made on 84% of the loading problem, spending resources trying to achieve 85% reduction on 3% of the SS load would be an ill effective and inefficient use of resources. How will the non-point load reductions be addressed?
30. Low flow and stream morphology (limited aeration during normal flow) are recognized as limiting factors. The TMDL document should note that habitat and stream morphology improvement projects could be more effective and cost efficient than extraordinary pollution controls (those beyond MEP) at meeting TMDL DO targets and will be recognized as TMDL implementation activities (i.e. BMPs).

*TMDL for Biota for the Rouge River Watershed, including Bishop and Tonquish Creeks*  
Content Comments

31. Overall, the biggest concern with the Biota TMDL is the data used to list the various stream reaches and the use of a “blanket approach”. The state is primarily relying on macro survey data collected in 2000 & 2005 that has consistent “acceptable” rankings and fish sampling conducted in 1995. The decision to list the entire watershed appears to rely on fish sampling only, but fish sampling has been very limited; only one site was sampled for fish community in 2005. The more recent macroinvertebrate sampling data would be more meaningful than the fish sampling results from 1995. How can the state justify this TMDL with such dated information and with “acceptable” macro scores at most sites?
32. The presentation given at the public meeting on June 27, 2007 contains one figure showing the location of sampling sites for 2005. However, similar figures for sampling sites in 1995 and 2000 were not presented during that public meeting. Can one or more maps be provided that shows the location and type of the sampling that was performed?
33. Given the MDEQ proposed to evaluate TMDL target attainment based on two consecutive years of sampling, the same approach should be applied to listing data. That is, the data from at least two consecutive monitoring events should be evaluated. If sampling at a single site results in a



“poor” rating, but the next results in an “acceptable” rating, then the data would be inconclusive and should not be used for listing or delisting. This is particularly true with biological community data due to the high degree of natural variability that is typical of such data. Can the state describe how the fish and macro data were evaluated?

34. Given that there are a total of nine listed reaches and at least four of those listed reaches were never sampled for fish community and many of the sites were not sampled in two consecutive events, how does the state justify listing all the reaches without more data?
35. Only one site in the entire Lower Rouge sub-watershed was rated as “poor” in 2005 and that was located on a small tributary. How can the Lower Rouge Subwatershed be included under the TMDL umbrella? Similar question for parts of the Main Branch above its confluence with the Upper Branch, the Franklin Branch, the Middle Rouge (except Bishop Creek), and the Evans Branch. How can the MDEQ chose to list the entire watershed without having watershed-wide data?
36. Data referenced in document indicates that majority of sites monitored have gone from “poor” to “acceptable” rating for macro invertebrates in just 10 years. The TMDL documents that Dry Weather Average TSS concentrations are within the “Good to Moderate” range and even the Wet Weather Average TSS concentrations are well below the “Poor” range for entire watershed as well as for each of the major branches. All of this has occurred with only partial implementation of CSO controls and initial voluntary storm water permit activities (BMPs). Given this much improvement with existing regulatory programs why is so much of the watershed still on the TMDL 303(d) list?
37. The TMDL recognizes that fish passage (the number of dams) is major limiting factor to fish community recovery and the data indicates the macroinvertebrate communities are recovering. Why is so much of the watershed still on TMDL 303(d) (a pollution control program) list for fish communities when major limiting factor is acknowledged as physical (dams)? Even without the connectivity problem wouldn't it naturally take longer for the fish community to recover relative to the macroinvertebrate community?
38. TMDLs should be defined as narrowly as possible due to the inherent legal, regulatory and financial ramifications. Can the MDEQ revise the TMDL to cover reaches where there is sufficient data and/or can the MDEQ provide a clearer summary of all the data that are being used to list the individual reaches and how data from one geographic area is being applied to other areas that were not sampled?
39. The “broad brush” approach taken by the MDEQ is inappropriate given that the data do not warrant listing of some branches and very long reaches or the mainstem and tributaries. In addition, the broad-brush approach prevents a focused effort on corrective actions where they are most needed. A more thorough job of data analysis and better listing decisions will create a better and more effective TMDL. What is the point in throwing an onerous TMDL over an entire watershed just because the agencies don't have the personnel, data, or science to appropriately identify real problems and develop geographically targeted, effective TMDLs?
40. The TMDL is based on TSS as a surrogate parameter under the assumption that TSS, flow regime, and stormwater management are directly correlated. It is very possible given the way this TMDL is written that a decrease in mean annual wet weather TSS concentrations could decrease over the next 10 to 20 years with no improvement in the fish and macroinvertebrate communities. If that occurs, MDEQ may be forced into a situation where it must impose storm water volume controls, particularly when the TMDL places so much emphasis on the importance of flow

regime. This could potentially have an impact on MS4 communities in the future. Furthermore, the TMDL states, “Achievement of the biological target will override this secondary target; however, if the TSS target is met, but the biological target not achieved, then the TSS target may be reevaluated.” This means that MDEQ will have the discretion to lower the target TSS concentration, placing further burden on MS4 communities in the future.

41. On pages 5 and 10, the MDEQ makes reference to “habitat connectivity” as a related issue. The comment on page 10 is particularly troublesome because it is used in the Linkage Analysis Section. Habitat connectivity cannot be evaluated or addressed in the context of the TMDL Waste Load Allocation and Load Allocation reduction targets. That is, there is no cause-effect relationship between habitat connectivity and TSS/flow. Furthermore, the TMDL does not provide a means by which habitat connectivity can be evaluated or monitored in the context of achieving the TMDL biological target. Habitat connectivity may be a real issue, but it is totally unrelated to the TMDL. Can these comments be removed from the document?
42. The Linkage Analysis Section does not present or discuss the scientific basis for establishing a linkage between TSS, flow, and fish and macroinvertebrate community health. Yet, the section concludes with the statement, “In summary, TSS loads in the Rouge River watershed, along with the commensurate decrease in flow volume and rate, should increase macroinvertebrate and fish community diversity and abundance, thus providing a tangible target towards meeting water quality standards. Can the MDEQ provide an explanation of how this conclusion was derived?
43. The TMDL states that attainment of the TSS target will be evaluated through analysis of TSS data collected during wet weather sampling but does not define “wet weather.” Can the MDEQ define this term?
44. Under the Monitoring Plan Section, the TMDL states that TSS sampling “may be conducted, if necessary.” However, it is not clear whether the MDEQ would conduct the supplemental TSS sampling or if communities would be required. Can this be clarified?
45. The TMDL includes the Main Branch from its confluence with the Lower Branch to its confluence with the Detroit River/Lake Erie. However, there apparently are no sampling points in that portion of the river. How will a reduction in TSS concentrations and/or an improvement in flow regime improve habitat in the concrete-lined portion of the Main Branch?
46. On page 3, the TMDL states that attainment of the biological target will be “...evaluated based on a minimum of two Procedure 51 assessments conducted in consecutive years following the implementation of efforts like Best Management Practices (BMPs) to stabilize runoff discharges and extremes in stream flow conditions, and minimize sediment loadings to the watershed.” What does “consecutive years” mean relative to the five-year rotation discussed in the Monitoring Plan Section? Does it mean that additional sampling will be conducted in back-to-back years or in two consecutive five-year cycles?
47. TMDL states that “Scores using the P-51 Procedure point to flow as a driving force.” However, the P-51 Procedure is a poor tool for establishing cause-effect relationships. Its intended and most valid use is to characterize conditions at a single point in space and time. Can the MDEQ revise this comment to more accurately reflect the nature of the conclusions drawn from P-51 results?

48. TMDL document should note that habitat and connectivity improvement projects are likely to be more effective and cost efficient than extraordinary pollution controls (those beyond maximum extent practicable) at meeting TMDL biota targets and will be recognized as TMDL implementation activities (i.e. BMPs).

Typographical Errors

49. Table 6: 133.3lbs/day is not 15% of 1092.3lbs/day. The last column is missing values.



# MEMO

Southeast Michigan Council of Governments  
535 Griswold Street, Suite 300  
Detroit, Michigan 48226  
(313) 961-4266  
Fax (313) 961-4869  
[www.semco.org](http://www.semco.org)

June 22, 2007

**TO:** Bill Creal and Dave Drullinger

**FROM:** SEMCOG/Phase II Permit Reissuance Focus Group

**SUBJECT:** Incentives for the Watershed Permit

Thank you again for welcoming input into the reissuance of the Phase II permit program. As we have discussed, SEMCOG convened a focus group of permit holders to begin these discussions. This memo focuses on incentives for the Watershed Permit. At the end of this document, is a list of participants in the focus group meeting.

We look forward to hearing from you soon to discuss our ideas.

## Incentives for the Watershed Permit

### **Incentives for the Watershed Permit Comments from the Phase II Permit Reissuance Focus Group**

We appreciate the fact that MDEQ is willing to work with us in reviewing the proposed reissuance of the Phase II permit. At the end of this memo is a list of people who participated in formulating the comments in this document.

As you might expect, the beginnings of our discussions focused on the various needs of our constituencies. But, we recognize the importance of also addressing the needs of MDEQ. Following are the needs of the permittees, as well as what we believe are the needs of MDEQ.

#### **Permittee Needs in a Watershed Permit**

- Recognition that watershed-based permits do not fit the “typical” paradigm for a regulatory permit program.
- Confidence that a watershed-based approach provides more opportunity for allocating limited resources toward activities that will produce the most water quality benefits.
- An implicit level of trust that the watershed-based approach will produce superior outcomes. That level of trust should be conferred upon permittees, especially to those permittees that have a proven track record of implementation and success.
- A higher degree of flexibility reflected in a permit design that presumes actions and activities will vary from place to place.
- A commitment from MDEQ, elected officials, and other permittees to actively engage in watershed planning and supporting implementation.

#### **MDEQ Needs in a Watershed Permit**

- Assurance that concrete actions are being implemented to improve water quality.
- The permittee adequately addresses permit requirements in their application, plans, and SWPPI.
- Watershed Permit remains an acceptable option from EPA.
- Timely implementation of permittee obligations under the Phase II permit.

We have strived to develop comments that address both sets of needs as described above.

**The watershed approach isn't always as easy for either MDEQ or the permittee.** We understand that overseeing the Watershed Permit process is not always an easy process and can often be more difficult than the jurisdictional permit to regulate. Similarly, a commitment to a watershed process is a commitment to engage with various stakeholders outside of the local community. This represents a higher level of dedication to what is often a more complex process. Nonetheless, local governments, MDEQ, and SEMCOG, have embraced the Watershed Permit because we understand the value – environmentally and fiscally – of the watershed approach.

## Incentives for the Watershed Permit

Through the first stormwater permit cycle, we became more familiar with the complexities of the watershed approach. But, we still value the environmental and fiscal benefits of this approach. Therefore, it is incumbent on all of us to make the watershed process work.

This memo is our attempt at evolving the watershed process based on lessons learned, while at the same time incorporating the needs of both MDEQ and permittees. While implementing some suggestions would only require minor modifications to the existing program, achieving our desired outcomes depends on implementing some big ideas and new ways of thinking.

**Allowing flexibility doesn't have to be at the expense of certainty.** Flexibility for permittees to effectively and efficiently implement programs in their jurisdictions represents the major advantage of the Watershed Permit. On the surface, this may appear to conflict with the regulatory agency's need to ensure implementation of concrete actions. In reality, it represents the most likely scenario for achieving water quality improvement in a more timely manner.

Watershed planning is an exercise in moving toward the optimal mix of programs needed to restore and protect water resources. By definition, that optimal mix will differ from place to place. Thus, the flexibility afforded by the Watershed Permit is critical to both efficiency and environmental protection.

**Implementation and accountability are both critical.** Permittees recognize that MDEQ needs to ensure the timely implementation of the Phase II permit. Further, we understand that permittees need to be held accountable by MDEQ. What is less clear, but just as important, is that permittees have some incentive to hold each other accountable.

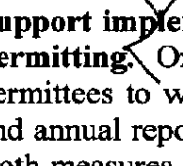
We propose the next permit rely heavily on self-policing and accountability through the watershed planning groups, co-permitting, and joint plans and SWPPIs. This would enable MDEQ to focus their Phase II enforcement in areas where little or no progress is being made.

### **Suggested Incentives for the Watershed Permit**

**Reward collaboration and innovation.** Encourage and reward collaboration and innovation by providing for flexibility in the watershed permit. Flexibility in the Watershed Permit can be manifest by explicitly recognizing that all actions and activities will not be required everywhere. This is particularly the case when permittees demonstrate collaboration and implementation that supports the watershed approach and focuses on restoring and/or protecting the resource. Examples include: collaborative (jointly funded) IDEP and PEP, formation of an institutional framework such as a Watershed Alliance/Authority, cooperation and financial support to nonprofit organizations, and ongoing watershed meetings where permittees report on the status of SWPPI implementation.

In addition, we suggest MDEQ recognize and encourage permittees take advantage of regional, nonprofit, and academic partnerships and activities as an effective and accepted method for implementing many components of the Watershed Permit.

## Incentives for the Watershed Permit



**Support implementation and accountability by enabling joint plans, reports, SWPPIs, and permitting.** One concept that would meet the needs of both MDEQ and permittees is to allow permittees to work as a watershed group and submit one PEP, IDEP, Watershed Plan, SWPPI and annual report. Taking this a step further, we recommend the permit allow for co-permitting. Both measures would result in more accountability, self-policing, collaboration, participation by the local community, and sharing of innovative ideas from permittees.

These enabling aspects of the permit program would also give significant purpose and meaning to watershed group activities. This is important because the more meaningful the watershed group activities, the more likely communities will engage in the process. This might even include communities not required to have a permit.

Many view the current SWPPI and reporting process as an individual requirement that no longer needs the collaboration of the watershed group. Our recommendations are geared towards providing more focus on the watershed plan and ensuring implementation of the plan priorities by permittees. We would like to have some open, creative dialogue to discuss how this might work and benefit both MDEQ and local governments.

**Incorporate agreed upon lists into the permit.** As stated in the introduction, we recognize MDEQ's need to ensure permittees adequately address permit requirements in their application, plans, and SWPPI. As such, we would suggest developing a list of actions permittees could implement to meet certain elements of the permit. The permittee can then select certain activities that meet the needs and priorities of their community. Our group is willing to assist in drafting such a list.

Finally, our experience has been that there is significant confusion over distinguishing what different types of permit holders actually own and operate in their jurisdiction. (e.g., although townships don't own their roads, some townships provide operational activities for county roads). To try and address this confusion, we suggest developing a checklist that clarifies what the permit holder owns and operates (i.e., is responsible for within their jurisdiction). Again, our group is willing to assist in drafting this checklist.

**Evaluate progress from a big picture perspective.** Watershed Permits should clarify that evaluations of progress, implementation, etc., will be based on considering all the activities undertaken, rather than each individual activity (e.g., number of brochures distributed, amount of hazardous waste collected). Such a tacit recognition in the permit, clarifies (for both MDEQ and the permittee) that certain actions are less important in certain areas. It also clarifies that watershed permittees will not be penalized for placing little or no emphasis on measures determined to be less effective.

**Enable comprehensive reporting.** Encourage partner accountability and self-policing through reporting processes that are integrated into the watershed planning meetings vs. individual annual reports and individual reporting on specific activities. For example, the watershed

## Incentives for the Watershed Permit

meetings could be an avenue for permittees to report on the status of SWPPI implementation. The group could then work together to develop a report for the watershed organization that would replace individual annual reports. Again, this would encourage more accountability, collaboration, and sharing of innovative ideas from permittees. (e.g., the Middle Huron Initiative successfully uses this reporting mechanism).

**Encourage cost efficiencies to help manage fiscal stress.** With the fiscal stress facing both the state and local governments, it has never been more important to focus on efficiency and cost effectiveness. It is critical for MDEQ to pursue a permit program that supports this concept. The Watershed Permit continues to be a means to put this concept into practice.

Cost efficiency is one of the desired outcomes of many of the recommendations made thus far. It is our perspective that enabling cost efficiencies will lead to implementation of more programs that actually improve water quality.

Following are two more steps that would be helpful:

- Support that watershed partnerships should be eligible for state revenue sharing incentives for service consolidation.
- Work with EPA to allow 319 grant funding to be utilized for Phase II stormwater activities.

**Provide incentives for small MS4s to remain in the Watershed Permit.** It would be helpful if permittees that own and operate a small area of MS4s (e.g., certain townships, school districts) participated in the watershed process. To increase the likelihood of participation, allow permittees to implement actions only in the MS4 area. Also, it would be appropriate to stipulate that these permittees participate in the watershed-planning groups in their jurisdiction. The permittee can specify a primary watershed and the implementation activities would be based on that primary watershed plan. (This would likely need to be a separate section of the permit that explains what is and isn't required due to their special circumstances).

**Enhance MDEQ staff's role in supporting the watershed planning process.** Consistent with the recommendations of the MDEQ Director's Environmental Advisory Committee and the Nonpoint Source Reengineering Committee, ensure MDEQ staff continues to participate in watershed meetings. From our perspective, MDEQ staff's role goes beyond answering permit-related questions. We see staff as a valued resource whose role extends to providing technical assistance towards the implementation of the watershed plan and individual SWPPIs.

**Sharpen the distinction between the watershed plan and SWPPI.** The development and updating of holistic watershed plans should be encouraged. In order to accomplish this, the watershed plan should be recognized as the guidance document to the watershed group and MDEQ. Put another way, there's a distinction with a difference between a watershed plan and a SWPPI. The SWPPI represents what permittees are obligated to do under the permit and their



## Incentives for the Watershed Permit

commitment to specific measures. Blurring this distinction will be a disincentive to more comprehensive watershed planning. Clarifying the distinction is a means to encourage more comprehensive watershed planning, and eventual implementation of additional actions. Another advantage of a process that distinguishes the watershed plan from the SWPPI is that it fits with the dynamic, evolving nature of collaborative watershed planning.

Other miscellaneous watershed incentives include:

- Allow municipal permittees that are in multiple watersheds to specify a primary watershed. The implementation activities for their entire jurisdiction could be based on that primary watershed plan. It is appropriate to stipulate that permittees participate in the watershed-planning groups in their jurisdiction.
- Goals and objectives are an essential part of a watershed plan. However, short-term, measureable objectives are not appropriate in the planning document. This should be discussed and negotiated with individual watersheds as they develop their SWPPI. Finally, clarify that the watershed plan only needs actions for those goals and objectives that relate to stormwater.

**Encourage collaboration on SWPPI development and implementation.** This includes allowing one SWPPI to be developed by the watershed group to implement the priorities of the watershed plan. At times, this may necessitate a more phased approach for communities working together on implementation (e.g., it will take longer to pass a common ordinance through 3 community processes than an individual community).

**Ways to make IDEP flexible.** The permit should recognize there is no single approach to IDEP, which is how the current program is structured. But to provide certainty to MDEQ, we recognize that any approach to IDEP would include some combination of public education, field staff training, dye testing, hotline complaint reporting, outfall reconnaissance inventories during routine field work, and receiving stream water quality monitoring to prioritize investigations and measure progress. The Alliance of Rouge Communities has demonstrated a combination approach for dealing with illicit discharges makes sense.

Each permittee would determine the combination best suited to their specific needs, capabilities, and budget. Water quality monitoring would be a key basis for helping establish the right emphasis for an IDEP program.

Finally, the permit should enable that one IDEP can be developed for a watershed.

**Support locally developed public education priorities.** The permittee should determine, in concert with the watershed, the priority audiences and topics to focus time and resources. This could be accomplished while developing one PEP for the watershed (e.g., Lower St. Joseph/Galien Phase II Watershed municipalities).

## Incentives for the Watershed Permit

**Recognize MDEQ's role in stormwater management.** The state has the opportunity to support local government efforts by incorporating and supporting stormwater management efforts at the state level. This includes adequately staffing the Part 91 soil erosion program and providing opportunities for communities to meet state regulations, while implementing stormwater management. For example, a SSO community may be able to meet some of their correction strategy by incorporating Low Impact Development practices in their planning and zoning processes.

### Focus Group Participants

Russ Beaubien, Spicer Group and consultant to Saginaw Area Storm Water Authority

Mary Bednar, Clinton Township

Janis Bobrin, Washtenaw County Drain Commissioner

Meghan Bonfiglio, Bloomfield Township

Dan Christian, TetraTech and consultant to numerous Macomb County Watershed Groups

Marcy Colclough, Southwest Michigan Planning Commission

Chuck Hersey, SEMCOG

Kristen Jurs, St. Clair County Health Department

Kelly Karll, ECT and consultant to Clinton and Rouge watershed groups

Christine Kosmowski, City of Battle Creek

Jennifer Lawson, City of Troy

Ric Lawson, Huron River Watershed Council

Amy Mangus, SEMCOG

Roger Moore, City of Rochester Hills

Noel Mullett, Wayne County Department of Environment

Amy Ploof, Oakland County Drain Commissioner's Office

Jim Ridgway, Alliance of Rouge Communities

Lynne Seymour, Macomb County Public Works Office

Bill Stone, Hubbell, Roth, & Clark and consultant to the Livingston County Phase II groups

Jim Wineka, Oakland County Drain Commissioner's Office

**DRAFT #3**

**Alliance for Rouge Communities  
Policy for Measuring In-Kind Contributions of Counties**

Article III Assessment of Costs to Members provides: based on the in-kind contributions currently provided by the member counties (Wayne, Oakland and Washtenaw), the counties will not be assessed to support the budget of the ARC. By August 15, 2007 the ARC will determine whether or not assessments will be made to the Counties taking into consideration the level of in-kind contributions for ARC related activities.

In determining whether or not assessment will be made to the Counties, the following ~~policy~~ policy is established for determining the level of in-kind contributions.  
All contributions allocated to Counties will be made on a drainage area basis.

1. Definition - In-kind Contributions.
  - a. In-Kind Contributions shall be measured as an account of a member County's time, expenses and materials contributed to ARC and/or Rouge River Watershed activities.
2. In-Kind Contributions include:
  - a. County staff participating in watershed management, educational or other conferences that further interests of the ARC and/or Rouge River Watershed activities.
  - b. County staff contributing to ARC Committee Activities.
  - c. Time and materials employed by County staff or contractors engaged by the county (and not otherwise funded by grant funding) for ARC or Rouge River watershed activities including but not limited to investigating and elimination of illicit connections, environmental education, River Day activities.
  - d. Any material and supplies provided by Counties that further interests of the ARC and/or Rouge River Watershed activities.
  - e. Other related activities such as studying problems, planning and implementation of activities designed to address surface water quality or water flow issues within the Rouge River watershed.
3. Calculation of In-Kind Contributions. The following factors shall be used in calculating In-Kind Contributions of Member Counties:

**DRAFT #3**

- a. Direct Labor (includes amount paid to employee as well as a mark up for recovery of non-productive benefits – such as vacation, holidays, etc).
- b. Customary Fringe Benefits (including but not limited to FICA, Retirement, Disability, Unemployment, Group Life & Accident, Workers Compensation, Medical, Dental, Optical).
- c. Equipment charges for equipment assigned to employees who perform tasks that benefit the ARC (e.g. PCs, Cell Phones, Vehicles).
- d. Equipment charges for general equipment that may be used periodically for the benefit of the ARC (e.g. Pool Vehicles, GPS devices).
- e. Services and/or Materials/Goods purchased that benefit the ARC.
- f. County Internal Service Fund charges for direct services benefiting the ARC (e.g. printing services from the County print shop).
- g. Indirect Costs - if applicable, includes costs from General Fund Departments such as County Treasurer, Human Resources, Facilities Management, Central Services, Management & Budget and County Executive.

If it is determined that the counties will be assessed dues, the maximum assessment total in any year to all member counties shall not exceed 12% of the combined total assessment for the same fiscal year for all other Primary Members. The 12% assessment limitation will be determined based upon the total amount assessed other primary members in the adopted annual ARC budget for a given fiscal year and not the subsequent actual assessments paid. In the event that the total assessments to counties determined on or before August of any given year for the following fiscal year exceeds 12% of the total for all other primary members subsequently approved in the ARC budget for the same fiscal year, the total amount assessed to the counties will be reduced such that the total does not exceed 12% of that assessed all other primary members.

The 12% assessment will be prorated to each county based upon equal weight to the population of each county within the watershed according to the most recent United States Census and the drainage area within the watershed.

- 4. If formally requested at a meeting of the ARC prior to its adoption of its Annual Budget, the Counties will provide a report to the ARC showing previous year's in-kind contributions and Budget Year's anticipated in kind contributions to the ARC or Rouge River Watershed activities.

Formatted: Indent: Left: 0.75"  
Formatted: Indent: Left: 0.5"

**ASSEMBLY OF ROUGE COMMUNITIES (ARC)  
PUBLIC INVOLVEMENT AND EDUCATION (PIE) COMMITTEE  
April - July 2007**

**PIE COMMITTEE MEETING** was held July 12, 2007 in Beverly Hills.

**PLANNING SUBCOMMITTEE:** will meet 2 p.m. August 2, 2007 at the City of Troy. The committee will be discussing 2008 budget recommendations.

**HOUSEHOLD HAZARDOUS WASTE SUBCOMMITTEE** will meet at 1 p.m. August 7, 2007 at Bloomfield Twp.

**MEASURING OUR SUCCESS POSTERS:** in draft form and currently being reviewed.

**NEXT PIE COMMITTEE MEETING:**

Thursday October 18, 2007, 1:30 p.m. City of Livonia DPW

**Michigan Department of Environmental Quality - Environmental Science and Services  
Targeted Watershed Grants Program (Formerly known as the Watershed Initiative)**

**Due Date:** September 30, 2007

**Cost Sharing or Matching Requirement:** 25%

**SUMMARY:** Implement watershed protection and restoration efforts at the community level and determine if those approaches: 1) produce short-term environmental results; 2) have the potential for long term maintenance in a watershed; and 3) have national applicability.

This grant opportunity is a nationwide competition. Gov. Granholm nominates the two “most meritorious” Michigan watershed projects to the USEPA for national consideration. EPA typically selects 10 to 20 watersheds throughout the country to receive grants each year. The following are the Michigan awards:

**2005:** No Michigan projects

**2004:** The Kalamazoo River

**Grant Amount:** \$1.2 million

**Grantee:** Gun Lake Tribe

**Project:** The project is developing a “transferable model trading framework for agricultural participation, phosphorus credit banking, education and implementation of conservation practices for trading.”

**2003:** The Manistee River

**Grant Amount:** \$408,000

**Grantee:** Little River Band of Ottawa Indians

**Project:** This project is implementing activities from the Manistee River Watershed Plan such as streambank stabilization; improved river access and decreasing erosion by building trails in high traffic areas; improvement of sturgeon habitat and channel conditions; water quality monitoring and public education activities.

**RECOMMENDATION:** The ARC would have to come up with an innovative project with broad support. The project also needs to show short-term results and have national applicability.

**Michigan Department of Environmental Quality - Environmental Science and Services  
Nonpoint Source Pollution Control Grants Clean Michigan Initiative**

**Due Date:** September 30, 2007

**Cost Sharing or Matching Requirement:** 25%

**Eligibility:** Includes county or local units of government and non-profit agencies

**SUMMARY:** To provide funding to implement the physical improvements in approved watershed management plans, and to address specific sources of nonpoint source pollution as identified by the Department of Environmental Quality (DEQ). Physical improvements are structural and vegetative best management practices.

This grant offers money for planning projects; information/education projects; watershed implementation projects and wastewater implementation projects.

Rouge communities and counties have successfully applied for these grants for watershed and wastewater implementation projects only. They are:

<b>Community</b>	<b>Project</b>	<b>Type of Funding</b>	<b>Grant Amount</b>
City of Novi	Outfall and Streambank Stabilization	2002-04 CMI NPS	\$50,000
City of Wayne	City Hall Storm Water Quality Improvements	2001-05 CMI NPS	\$337,220
City of Westland	Outfall Inventory and Storm Water Study	2002-04 CMI CWF	\$334,296
Northville Twp.	Quail Ridge Drain Improvements	2001-03 CMI NPS	\$335,759
City of Dearborn	Ford Field Bridge Improvements	2002-03 CMI NPS	\$561,216
City of Dearborn	Illicit Connection Elimination	2003 CMI NPS	\$154,756
City of Pontiac	Low Impact Development techniques/demonstration project	2006 CMI NPS	\$160,907

In addition, Wayne County Department of Environment has received three CMI grants (2001, 2002 and 2005) to conduct IDEP activities along the Lower Rouge and the Middle Rouge branches.

**RECOMMENDATION:** That the ARC apply for a CMI/NPS implementation grant that could dovetail into the Rouge River watershed management planning efforts. This grant could be matched by Rouge Project funding. I am not sure MDEQ would give us planning money. Maybe we could argue that the implementation project is updating the plans to 319 requirements.

**Michigan Department of Environmental Quality - Environmental Science and Services  
Nonpoint Source Pollution Control Grants Federal Clean Water Act Section 319**

**Due Date:** September 30, 2007

**Cost Sharing or Matching Requirement:** 25%

**SUMMARY:** To provide funding to: 1) develop watershed management plans to address non-point sources of pollution; and 2) implement non-point source activities identified in DEQ-approved watershed management plans.

Typically, Alliance members have applied for 319 grants to update the existing subwatershed management plans to 319 funding. In 2006, the Lower 1, the Middle 1 and the Main 1-2 applied for 319 funding to update their existing subwatershed management plans. The Lower 1 and Middle 1 also included implementation projects. None of these submittals were approved.

In 2007, the Main 1-2, through the City of Southfield, applied for a 319 grant to update its subwatershed management plan. This year's submittal included an implementation project for a streambank stabilization project at Lawrence Technical University. (The Lawrence Tech project was submitted in 2006 as a stand alone implementation project and was not funded) This year's 319 awards are to be announced in August.

**2006 Section 319 Awards**

<b>Organization</b>	<b>Project Name</b>	<b>Amount</b>
Michigan State University	MSU Social Indicators Analysis and Dev. Tools	\$131,311
Annis Water Resources Institute of GVSU	White River Watershed Planning	\$154,918
Chippewa/East Mackinac Conservation District	Les Cheneaux Watershed Implementation	\$618,403
Huron Pines Resource Conservation District	Pine River/Van Etten Lake Watershed Planning	\$61,333
Branch County Conservation District	Hodunk/Messenger Chain of Lakes Watershed Planning	\$191,544
Leelanau Conservancy	Lake Leelanau Watershed Permanent Land Protection 2	\$447,500
Land Conservancy of West Michigan	Rogue River Watershed Update and Easement	\$483,623
Long Lake Township	Long Lake Watershed Septic Inspection and Regulation	\$26,428
Huron River Watershed Council	Millers Creek Watershed BMP Implementation	\$396,962
Kalamazoo River Watershed Council	Kalamazoo River Watershed Management Plan	\$258,222
Center for Water & Society , Michigan Tech	Huron Creek Watershed Management Plan	\$438,667

**RECOMMENDATION:** The ARC communities have yet to receive any funding from this source. We should meet with the MDEQ to determine why we have come up short before committing the effort to preparing a submittal..





James W. Ridgway, P.E.  
Executive Director

July 26, 2007

Allen Park  
Auburn Hills  
Beverly Hills  
Bingham Farms  
Birmingham  
Bloomfield Hills  
Bloomfield Twp.  
Canton Twp.  
Commerce Twp.  
Dearborn  
Dearborn Heights  
Farmington  
Farmington Hills  
Franklin  
Garden City  
Inkster  
Lathrup Village  
Livonia  
Melvindale  
Northville  
Northville Twp.  
Novi  
Oak Park  
Oakland County  
Orchard Lake  
Plymouth  
Plymouth Twp.  
Pontiac  
Redford Twp.  
Rochester Hills  
Romulus  
Southfield  
Superior Twp.  
Troy  
Van Buren Twp.  
Walled Lake  
Washtenaw County  
Washtenaw County  
Commission  
Wayne  
Wayne County  
Wayne County Airport  
Authority  
West Bloomfield Twp.  
Westland  
Wixom

Lieutenant Colonel William J. Leady  
U.S. Army Corps of Engineers, Detroit District  
477 Michigan Ave.  
Detroit, Michigan 48226

Dear Commander Leady:

The Alliance of Rouge Communities (ARC) continues to be a strong advocate and supporter of comprehensive watershed planning to protect and restore our natural waterways. Accordingly, ARC is committed to partnering with the U.S. Army Corps of Engineers to further the authorized Rouge River Supplemental Watershed Study; and respectfully requests your support in releasing available funding to complete the Project Management Plan and to actively seek future appropriations to aggressively pursue the Feasibility Phase of this vital initiative.

The 438 square miles Rouge River watershed includes all or part of 48 municipalities in three counties, with a population of over 1.4 million. The industrial growth of the lower Rouge River in the first half of the twentieth century and the rapid residential and commercial growth in the last half of the century in the upper portions of the watershed created serious pollution problems. Although much has been accomplished to improve the water quality of the Rouge River, the completion of the comprehensive Watershed Management Plan, initiated in 2002, is critical to continuing efforts to restore and protect this vital resource.

A Section 905(b) recognition report was approved by the U.S. Army Corps of Engineers in 2006 and funds were allocated to the Detroit District to initiate preparation of a Project Management Plan (PMP) to delineate the scope, tasks to be accomplished, and a total cost estimate and budget for the feasibility phase. Current authorization requires a 50% non-federal cost sharing contribution from the project sponsor(s) for the feasibility effort. Therefore the PMP is a critical document that must be prepared jointly with, and concurred in by all likely study sponsors, including ARC.

The ARC is committed to work with other interested parties to formulate the cost-sharing requirement for the study. Although the Rouge River communities are committed to the well being and improvement of the resource, each community may have different local priorities and/or areas of concern. Accordingly, I request that the Corps work with the ARC, and others, in the development of a PMP that will allocate non-federal costs consistent with local priorities and unique abilities to provide in-kind services. It may be advisable to consider a phased study process to insure widespread involvement with all interested stakeholders.

Lieutenant Colonel William J. Leady

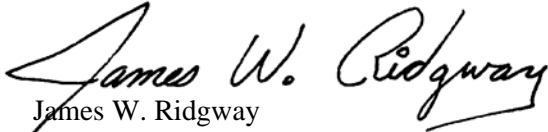
July 26, 2007

Page 2

Thank you, in advance, for your consideration. We look forward to working with you on this very important project. If you have any questions or concerns, feel free to contact me at any time.

Sincerely,

**ALLIANCE OF ROUGE COMMUNITIES**

A handwritten signature in black ink that reads "James W. Ridgway". The signature is written in a cursive style with a large initial 'J' and a long, sweeping underline.

James W. Ridgway  
Executive Director



James W. Ridgway, P.E.  
Executive Director

July 26, 2007

Allen Park  
Auburn Hills  
Beverly Hills  
Bingham Farms  
Birmingham  
Bloomfield Hills  
Bloomfield Twp.  
Canton Twp.  
Commerce Twp.  
Dearborn  
Dearborn Heights  
Farmington  
Farmington Hills  
Franklin  
Garden City  
Inkster  
Lathrup Village  
Livonia  
Melvindale  
Northville  
Northville Twp.  
Novi  
Oak Park  
Oakland County  
Orchard Lake  
Plymouth  
Plymouth Twp.  
Pontiac  
Redford Twp.  
Rochester Hills  
Romulus  
Southfield  
Superior Twp.  
Troy  
Van Buren Twp.  
Walled Lake  
Washtenaw County  
Washtenaw County  
Commission  
Wayne  
Wayne County  
Wayne County Airport  
Authority  
West Bloomfield Twp.  
Westland  
Wixom

NAME  
ADDRESS  
CITY, STATE ZIP

Dear Senator/Congressman:

Your assistance is respectfully requested to renew efforts for a vital component of the overall efforts to restore and preserve the natural resources of the Rouge River Watershed. Specifically, your support is requested to support the use of previously appropriated funds by the U.S. Army Corps of Engineers to work with the Wayne County Department of Environment, the Alliance of Rouge Communities (ARC) and other stakeholders to resume preparation of the Project Management Plan (PMP) for the Rouge River Supplemental Watershed Study. Your assistance is also requested to assure sufficient funds are available in Fiscal Year 2008 to complete the PMP and to execute a Feasibility Cost Sharing Agreement, necessary to begin the cost shared feasibility phase.

The Rouge River Supplemental Watershed Study, authorized by Section 102 of the River and Harbor Act of 1966, was initiated in Fiscal Year 2002 when Congress provided a specific study appropriation to the U.S. Army Corps of Engineers. A 905(b) reconnaissance report was approved in 2006 recommending preparation of a supplemental basin-wide watershed management study to recommend multipurpose water quality management measures and improvements, including flow management, the ecological/physical impacts of watershed dams, stream buffering and general riparian corridor management. It was also recommended that the watershed management study also investigate the urban impacts on cold-water fisheries, natural resource preservation and ecosystem restoration in an urban setting, and the Rouge's environmental infrastructure, navigation recreation and education opportunities, and flood management issues.

Funds were allocated to the Detroit District of the U.S. Army Corps of Engineers in 2006 to initiate preparation of the PMP to delineate the specific scope, tasks to be accomplished, costs, and budget for the feasibility phase of the watershed management study. The 438 square mile Rouge River Watershed includes all of part of 48 communities in three counties. A coalition of these interests will be required to serve as the non-Federal sponsor for the study and to provide the required cost sharing assurances the Corps requires moving into the feasibility phase.

The ARC is committed to work with other interested parties to address the cost sharing requirements of the study and to develop a PMP to allocate the non-federal cost requirements among the partnering entities and to recognize the specialized expertise that each may offer to provide in-kind service.

Senator/Congressman

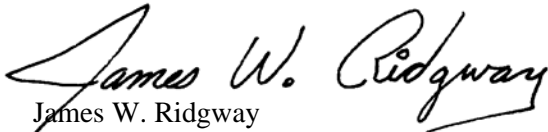
7/26/2007

Page 2

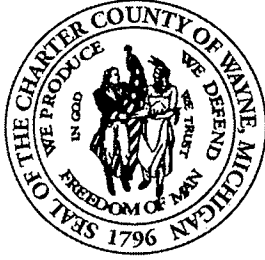
The Corps estimates that \$100,000 would be required in FY 2008 to complete the PMP, and to negotiate and execute a Feasibility Cost Sharing agreement. Your support in securing this funding through Fiscal Year Energy and Water Appropriation, or a reprogramming of available funds to complete an ongoing study phase would be greatly appreciated.

Sincerely,

**ALLIANCE OF ROUGE COMMUNITIES**

A handwritten signature in black ink that reads "James W. Ridgway". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke at the end.

James W. Ridgway  
Executive Director



Wayne County  
Department of Environment  
Watershed Management Division  
**MEMORANDUM**

---

To: Kurt Giberson, Chair  
Alliance of Rouge Communities  
From: Kelly A. Cave, Director  
**Re: Round VIII Subgrant Program**  
**Rouge River National Wet Weather Demonstration Project**  
Date: 21 June 2007

---

Wayne County is very pleased to announce the recommendations for projects to receive funding under the Rouge VIII Subgrant Program of the Rouge River National Wet Weather Demonstration Project (Rouge Project).

The *Round VIII Notice of Grant Availability* (NGA) was publicized on March 16, 2007 after review by the ARC Technical Committee. Proposals were received on May 14, 2007 as follows:

1. **Round VIII-Part A:** This part is for activities related to control of combined sewer overflows (CSOs) and sanitary sewer overflows (SSOs) to the Rouge River. The target allocation of grant funding for Round VIII-Part A was \$ 800,000 (\$ 2,000,000 in total project costs). There were two proposals received by the County under this part for \$3,059,490 in total project costs (\$1,223,796 federal; \$1,835,694 local share).
2. **Round VIII-Part B:** This part is for activities related to the responsibilities under the MDEQ Storm Water General Permit and located within the Rouge River Watershed. The target allocation of grant funding for Round VIII-Part B was \$ 1,300,000 (\$ 2,000,000 in total project costs). There were 20 proposals received by the County under this part for \$3,808,309 in total project costs (\$ 1,863,878 federal; \$1,944,431 local share).

The proposals were reviewed by a five person selection committee based on criteria published in the NGA. The attached tables present the recommendations for awards under the Round VIII subgrant program. Under Part A (CSO/SSO control), there were two projects awarded funding. Under Part B (Stormwater/Watershed Management), there were 12 projects awarded funding. These projects are recommended for funding pending agreement by the agency to required changes to and conditions on the scope of work and budget for the project. The required changes and conditions will be discussed with the agency at the project startup meeting. The projects recommended for funding are pending approval of Wayne County Commission.

In addition, Wayne County anticipates that additional Rouge Project funding will be available for ARC activities during 2008.

**Rouge River National Wet Weather Demonstration Project**  
***Projects Recommended for Funding***  
**Round VIII Part A Federal Grants for CSO/SSO Control Projects**

<b>Project Number</b>	<b>Lead Agency</b>	<b>Project Description</b>	<b>Federal Share</b>
RVIIIA-01	WCDOE- Engineering	North Huron Valley / Rouge Valley Sewer System Evaluation Project	\$395,237
RVIIIA-02	City of Dearborn	Sewer Separation of CSO Outfall 012	\$404,763
<b>Total</b>			<b>\$800,000</b>

Proposals Submitted May 14, 2007

CSO=Combined Sewer Overflow

SSO=Sanitary Sewer Overflow

SW = Storm Water

**NOTE: These projects are recommended for funding pending agreement by the agency to required changes to and conditions on the scope of work and budget for the project. The required changes and conditions will be discussed with the agency at the project startup meeting. The projects recommended for funding are pending on approval of Wayne County Commission.**

**Rouge River National Wet Weather Demonstration Project**  
***Projects Recommended for Funding***  
**Round VIII-Part B Federal Grants for Storm Water General Permit Activities**

<b>Project Number</b>	<b>Lead Agency</b>	<b>Project Description</b>	<b>Federal Share</b>
RVIIIB-01	South Oakland County Water Authority	Rouge-Friendly Lawns & Landscapes: Demonstration Projects & Public Education	\$35,000
RVIIIB-02	Friends of the Rouge	Public Education and Involvement Projects - Round VIII	\$255,393
RVIIIB-04	University of Michigan - Dearborn	Storm Water Education - Round VIII	\$156,618
RVIIIB-05	City of Novi	Regional Basin Retrofit for Water Quality Improvements	\$202,500
RVIIIB-06	Bloomfield Township	Hadsell Detention Basin Enhancement	\$74,344
RVIIIB-08	Northville Twp	Water Quality Monitoring and SWPPI Activities	\$44,925
RVIIIB-09	City of Southfield	Beech Woods Naturalized Streambank and Soil Erosion Control Project	\$49,250
RVIIIB-12	Van Buren Twp	Vegetation Enhancements for Improved Pollutant Removal Efficiencies	\$59,500
RVIIIB-15	City of Farmington Hills	Danvers Pond Removal and Stream Restoration Design	\$274,092
RVIIIB-16	Cranbrook	Rouge River Water Festival @ Cranbrook 2008	\$39,855
RVIIIB-19	Canton Township	Canton Detention Basin Enhancement - Round VIII	\$100,018
RVIIIB-20	Canton Township	Workman Elementary Schoolyard Habitat	\$23,050
<b>Total</b>			<b>\$1,314,545</b>

Proposals Submitted May 14, 2007

CSO=Combined Sewer Overflow

SSO=Sanitary Sewer Overflow

SW = Storm Water

**NOTE: These projects are recommended for funding pending agreement by the agency to required changes to and conditions on the scope of work and budget for the project. The required changes and conditions will be discussed with the agency at the project startup meeting. The projects recommended for funding are pending on approval of Wayne County Commission.**