

> Rouge River Watershed TMDL Implementation Plan Metrics Report

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ALLIANCE OF ROUGE COMMUNITIES
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Attachment A TMDL Plan Participants

Summary

Tracking metrics specified in the Alliance of Rouge Communities (ARC) Collaborative Total Maximum Daily Load (TMDL) Implementation Plan were assessed in this report to evaluate progress being made towards reaching goals that were designed to improve water quality in the Rouge River watershed in accordance with TMDL requirements. This report assesses how well the ARC has achieved goals set out in the Collaborative Illicit Discharge Elimination Program (IDEP) Plan, the Collaborative Public Education Program (PEP), and individual community metrics. Many of the metric goals have been met. However, progress is still needed to achieve Metric A: Success of the Collaborative IDEP Plan, and implementation of post-construction stormwater standards has been slow to take off due to delays in ordinance approvals. In addition, increased catch basin inspections and better record keeping of these inspections is necessary for some communities.

1.0 Introduction

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) required MS4 permittees to develop a TMDL Implementation Plan as part of their permit applications in 2016. ARC members chose to develop a collaborative plan to address all TMDL impairments. The plan was approved by EGLE in 2019 with an update approved in 2020. The ARC members participating in the plan are listed in Attachment 1.

The plan outlines best management practices to be completed by the permittees to improve water quality. The effectiveness of this plan is to be measured using the tracking metrics indicated in Table 1. The milestones are based on each permittee’s commitment in their SWMP. This metric summary report describes the progress toward meeting the milestones.

Table 1. Tracking Metrics for Evaluating Effectiveness

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

2.0 Metric Status

2.1 Success of the Collaborative IDEP Plan

Of the seven BMPs tracked for evaluating effectiveness of the Collaborative IDEP plan, three goals were completely met, and four goals were not met. The goals that were not met were IDEP #1 because one community has not yet provided storm sewer data, IDEP #3 because five illicit connections are not yet corrected, IDEP # 4 because not all communities have enough staff trained, and IDEP #7 because some years there was only one work group meeting and attendance did not reach the goal. However, progress is being made towards reaching these goals and those that were not achieved are on track to be reached in the next permit cycle. See Table 2 for more information.

Table 2. Tracking Metrics for Evaluating Effectiveness

BMP	Goal	Progress
IDEP #1: Mapping	100% of permittee outfalls in one GIS database	<ul style="list-style-type: none"> Most permittees provided the ARC with their outfall and storm sewer GIS data. Only Melvindale still needs to provide their storm sewer system in GIS format.
IDEP #2: Outfall Prioritization and Dry Weather Screening	Screen 100% of priority outfalls.	<ul style="list-style-type: none"> All priority outfalls and newly identified outfalls were screened.
IDEP #3: Advanced Investigations	<p>Follow the advanced investigation protocol for initial priority areas and priority outfalls.</p> <p>100% of illicit connections/discharges resolved</p>	<ul style="list-style-type: none"> All Category A and B outfalls and priority areas have been investigated. A total of 24 illicit discharges containing sewage from residential homes were identified. All but 5 of the illicit connections have been corrected. There are 10 ongoing illicit connection investigations.
IDEP #4: Staff Training	<p>1 person per MS4 trained at the Investigator level.</p> <p>50% of field staff trained at the Alert Observer Level.</p>	<ul style="list-style-type: none"> There are 458 field staff employed by the permittees. Of these, 258 staff (56%) are trained at the awareness level or greater: 125 at the investigator level and 258 at the alert observer level. Most permittees have more than 1 person trained at the investigator level and more than 50% trained at the alert observer level, while others fall short of these targets.
IDEP #5: Pollution Complaints	100% of complaints addressed	<ul style="list-style-type: none"> 129 complaints received and referred or investigated. 115 issues identified. 115 issues resolved.
IDEP #6: Inspection of Member Facilities	<p>100% of existing facilities dye tested.</p> <p>100% of issues addressed.</p>	<ul style="list-style-type: none"> 100% of permittee-owned facilities have been dye tested. 5 issues were identified. 4 issues were resolved. The outstanding issue is not scheduled for correction because of limited potential for an illicit discharge at that facility.

BMP	Goal	Progress
IDEP #7: IDEP Work Group	2 meetings per year. 80% member participation. 2 meeting summaries per year.	<ul style="list-style-type: none"> • 1-2 meetings were held each year. • 73% of members in attendance on average at meetings. • Meeting summaries were completed for each meeting.

2.2 Status of adoption of Post-Construction Stormwater Standards by Permittee

As of March of 2023, 74% of permittees have adopted the new post-Construction stormwater standards either by ordinance or by policy, and 26% of permittees are in the process of adopting the standards. See Table 3.

Table 3. Status of adoption of Post-Construction stormwater standards

Permittee	Status
Beverly Hills	Adopted
Bingham Farms	Adopted
Birmingham	Adopted
Bloomfield Hills	Adopted
Bloomfield Twp.	Adopted
Canton Twp.	Adopted
Dearborn Heights	In process of adopting
Farmington	Adopted
Farmington Hills	Adopted
Franklin	In process of adopting
Garden City	Adopted
Inkster	In process of adopting
Lathrup Village	Adopted
Livonia	Adopted
Melvindale	Adopted
Northville	Adopted
Northville Twp.	Adopted
Novi	In process of adopting
Oak Park	Adopted
Plymouth	Adopted
Plymouth Twp.	Adopted
Redford Twp.	Adopted
Southfield	In process of adopting
Troy	Adopted
Walled Lake	In process of adopting
Wayne	In process of adopting
West Bloomfield Twp.	In process of adopting
Westland	Adopted
Henry Ford College	Adopted
Schoolcraft College	Adopted

Wayne County Airport Authority (WCAA) – Willow Run Airport	Adopted
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2.3 Number of stormwater plans reviewed for non-permittee sites under new standards vs previous standards

For most of the permittees, the new standards were either very recently implemented or are still in the process of being approved. Therefore, just 5% of plans were reviewed under new standards for non-permittee owned sites. See Table 4.

Table 4. Number of stormwater plans reviewed for non-permittee sites under new standards vs previous standards

Permittee	Number of plans reviewed under previous standards	Number of plans reviewed under new standards
Beverly Hills	21	0
Bingham Farms	0	0
Birmingham	1	0
Bloomfield Hills	3	0
Bloomfield Twp.	N/A	N/A
Canton Twp.	N/A	N/A
Dearborn Heights	1	0
Farmington	5	0
Farmington Hills	80	0
Franklin	0	0
Garden City	0	0
Inkster	4	0
Lathrup Village	2	0
Livonia	39	1
Melvindale	0	0
Northville	2	1
Northville Twp.	N/A	N/A
Novi	81	0
Oak Park	0	0
Plymouth	3	0
Plymouth Twp.	N/A	N/A
Redford Twp.	N/A	N/A
Southfield	26	0
Troy	20	4
Walled Lake	1	0
Wayne	2	0
West Bloomfield Twp.	N/A	N/A
Westland	6	8
Henry Ford College	N/A	N/A
Schoolcraft College	N/A	N/A

Permittee	Number of plans reviewed under previous standards	Number of plans reviewed under new standards
Wayne County Airport Authority (WCAA) – Willow Run Airport	N/A	N/A
Total	298	14
Percentage	95%	5%

2.4 **Percentage of permittee projects constructed under new standards vs previous standards**

For most of the permittees, the new standards were either very recently implemented or are still in the process of being approved. Therefore, just 13% of plans were reviewed under new standards for permittee owned sites. See Table 5.

Table 5. Percentage of permittee projects constructed under new standards

Permittee	Number of plans reviewed under previous standards	Number of plans reviewed under new standards
Beverly Hills	0	0
Bingham Farms	0	0
Birmingham	0	0
Bloomfield Hills	0	0
Bloomfield Twp.	0	0
Canton Twp.	1	1
Dearborn Heights	0	0
Farmington	5	0
Farmington Hills	1	0
Franklin	0	0
Garden City	0	0
Inkster	4	0
Lathrup Village	0	0
Livonia	5	0
Melvindale	0	0
Northville	0	0
Northville Twp.	0	0
Novi	9	0
Oak Park	0	0
Plymouth	3	1
Plymouth Twp.	4	0
Redford Twp.	1	0
Southfield	0	0
Troy	6	4
Walled Lake	1	0
Wayne	2	0
West Bloomfield Twp.	5	0
Westland	0	0
Henry Ford College	N/A	N/A
Schoolcraft College	N/A	N/A

Permittee	Number of plans reviewed under previous standards	Number of plans reviewed under new standards
Wayne County Airport Authority (WCAA) – Willow Run Airport	N/A	N/A
Total	47	6
Percentage	87%	13%

2.5 Success of Collaborative PEP Plan

Of the nine PEP action strategies tracked for evaluating effectiveness of the Collaborative PEP plan, goals for eight action strategies were completely met or exceeded, and goals for one action strategy were not met. This is because only 2 static displays were created and the goal was to create 3 displays. However, this goal was met with the creation of an additional display in 2023. See Tables 6-14 for more information.

Table 6. PEP #1

PEP #1: Distribute pollution prevention literature on various topics through brochures, educational materials, and other media.	
Goal: <ul style="list-style-type: none"> • Create at least 2 brochures/materials during permit cycle including one to educate commercial/industrial/educational & institutional entities • Develop at least 24 Facebook posts • Materials available at ARC member facilities 	
METRIC	STATUS
Number of materials distributed/topic/location/event name	<ul style="list-style-type: none"> • 2018 – more than 19,490 materials distributed • 2019 – more than 11,230 materials distributed • 2020 – created new brochure titled “When it comes to household chemicals change is a good thing!” • 2020 – more than 5,000 materials distributed (COVID-19 impacted distribution numbers) • 2021 – designed jar opener made of recycled tires with healthy habits to protect the Rouge River watershed • 2021 – designed community fleet vehicle magnet • 2021 – more than 11,900 materials distributed
Number of posts/views on ARC Facebook	<ul style="list-style-type: none"> • 2018 – 25 created posts • 2019 – 51 created posts • 2020 – 70 created posts • 2021 – 53 created posts
Viewer numbers from electronic (tv, billboard etc.) media when used	One Water Campaign reached more than 25 million people during spring/summer of 2019. Including: <ul style="list-style-type: none"> • 14 million impressions via outdoor advertising on billboards and buses • 1.3 million impressions on 120 broadcast TV spots • 491,000 video views on social media • More than 2,300 shares and retweets

	<ul style="list-style-type: none">• 3 million impressions on 115 radio spots <p>In 2021 the ARC developed, in coordination with SEMCOGs One Water Campaign, a six minute video on the ARC and watershed stewardship activities</p> <ul style="list-style-type: none">• Video on ARC website• Video on ARC Facebook with more than 2,000 views
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Table 7. PEP #2

PEP #2: Coordinate and distribute community articles and ad graphics on pollution prevention and watershed restoration and stewardship	
Goal	
<ul style="list-style-type: none"> • Coordinate/distribute existing articles/ad graphics • Develop 1 new article/1 new ad graphic per year (total of 5 during permit cycle) • Increase in ARC website traffic and Facebook views 	
METRIC	STATUS
List of articles/ad graphics with title, topic and date	<ul style="list-style-type: none"> • Brine Instead of Rock Salt to Protect Water Quality! (article) • Home Recipe for Brine (graphic) • What Is A Watershed & What Does It Have to Do with Me? (article) • Watershed you live in (graphic) • 2020 – When it Comes to Household Chemicals – Change is a Good Thing (article) • 2020 – Chemical change is a good thing (graphic) • 2021 – Let’s All Dispose of Fats, Oils & Grease (FOG) Properly (article) • 2021 – No fats, oils or grease in the drain (graphic)
List of articles/ad graphics promoted on ARC website/Facebook	<ul style="list-style-type: none"> • Brine Instead of Rock Salt to Protect Water Quality! (article) • Home Recipe for Brine (graphic) • What Is A Watershed & What Does It Have to Do with Me? (article) • Watershed you live in (graphic) • 2020 – Chemical change is a good thing (article/graphic) • 2021 – Let’s all Dispose of Fats, Oils & Grease (FOG) Properly (article/graphic)
Number of views on ARC website/Facebook	See Appendix A – Electronic Media Report

Table 8. PEP #3

PEP #3: Provide static displays and posters on pollution prevention and watershed restoration and stewardship	
Goal	
<ul style="list-style-type: none"> • Distribute 4 seasonal posters, post and rotate seasonally at least 3 out of 5 years during permit cycle. • Update/create at least 3 static displays and use at 3-4 ARC member community events per year during the permit cycle with a minimum of 2 events in each of the 7 subwatersheds during the permit cycle. 	
METRIC	STATUS
Report of static display/date/location and title of events where displays were used (4 events per year, 2 events in each subwatershed during permit cycle)	<ul style="list-style-type: none"> • 2018 – banner at 24 events • 2019 – banner at 24 events • 2020 – designed two new banners with topic Chemicals – Change is a Good Thing • 2020 – banner at 12 events (COVID-19 impacted, not rotated until fourth quarter of 2020) • 2021 – banner at 56 events • Banners have been at 2 events in each of the 7 subwatersheds during the permit cycle

PEP #3: Provide static displays and posters on pollution prevention and watershed restoration and stewardship	
Number of posters distributed and location (<i>rotate 3 out of 5 yrs. of permit cycle</i>)	<ul style="list-style-type: none"> • 486 copies of seasonal posters were distributed at community events during the reporting period. • 23 of the 29 permittees displayed posters in 2 of the reporting years and 3 displayed them in 1 of the years in their buildings • 84 copies of seasonal posters were distributed at community events during the reporting period. • 17 of the 31 permittees displayed posters in 2 of the reporting years and 10 displayed them in 1 of the years in their buildings
Number of static displays created annually (<i>3 over permit cycle</i>)	<ul style="list-style-type: none"> • 1, 3-panel display created "You can Protect Water Quality in the Rouge River" • 1, 2-panel display created "Chemicals – Change is a Good Thing" •

Table 9. PEP #4

PEP #4: Promote environmental hotlines to educate the public on illicit discharges and promote public reporting of illicit discharges and improper disposal of materials into the MS4	
Goal	
<ul style="list-style-type: none"> • Distribute materials annually with hotline referenced • Promote on ARC and ARC member community website and Facebook 	
METRIC	STATUS
Number of materials distributed annually	<ul style="list-style-type: none"> • 2018 – 310 Waterfront Wisdom brochures distributed with hotline referenced • 2019 – 421 Waterfront Wisdom brochures distributed with hotline referenced • 2020 – 3,919 brochures distributed with hotline and collection/disposal information referenced (Waterfront Wisdom, Watershed Wisdom, When it Comes to Chemicals – Change is a Good Thing) • 2021 – 5,209 brochures distributed with hotline and collection/disposal information referenced (Waterfront Wisdom, Watershed Wisdom, When it Comes to Chemicals – Change is a Good Thing)
Number of views on ARC website and Facebook	<ul style="list-style-type: none"> • 2020 – Brochures added to website that reference the hotline and collection/disposal information.

Table 10. PEP #5

PEP #5: Distribution of "homeowner" materials to promote the importance of pollution prevention and watershed restoration and stewardship	
Goal	
Develop homeowner materials within 1 year of permit approval	
METRIC	STATUS
Completion of brochure	Completed in 2019 "Watershed Wisdom for Homeowners-Healthy Habits for Clean Water"
Number of materials distributed annually	<ul style="list-style-type: none"> • 2020 – 3,818 copies of "Watershed Wisdom for Homeowners – Healthy Habits for Clean Water" • 2021 – 858 copies of "Watershed Wisdom for Homeowners – Healthy Habits for Clean Water"
Number of materials distributed to new homeowners by ARC member communities	<ul style="list-style-type: none"> • 2020 – 524 distributed through realtors • 2020 – 549 distributed through homeowner's associations

PEP #5: Distribution of “homeowner” materials to promote the importance of pollution prevention and watershed restoration and stewardship	
	<ul style="list-style-type: none"> • 2021 – 100 distributed through League of Women Voters

Table 11. PEP #6

PEP #6: Develop and promote educational workshops and presentations	
Goal	
<ul style="list-style-type: none"> • Conduct six workshops/presentations during the permit cycle, 1 or more per year and at least 1 per subwatershed. • Each event will average at least 15 participants. • ARC member communities will promote and/or host events • One or more will target businesses 	
METRIC	STATUS
Number and topics of materials handed out and presented	<ul style="list-style-type: none"> • ARC conducted 1 Septic System Webinar on 11/4/19 with 19 participants. Facebook/website link to recorded webinar reaching 552 people and growing. Topics included septic system maintenance, promoted pollution hotlines and general Rouge River stewardship activities • Collaborative activities began upon approval of the Collaborative PEP in March 2017. In 2017, the ARC hosted 2 Septic System Maintenance workshops and developed and hosted 2 Stewards of the Rouge River workshops in partnership with FOTR. • 2020 – ARC conducted 1 Stewards of the Rouge – How You can Protect Water Quality!” Webinar on 10/29/20 with 17 participants • 2021 – ARC conducted 1 “Septic System Maintenance” webinar on 11/17/21 with 17 participants. Both webinar recordings were added to the ARC’s website • 2020 – Due to COVID-19 FOTR had limited in-person activities which included an artwork contest, compiled at-home environmental education activities and conducted sampling through the Rouge Education Project. • 2021 – Due to COVID-19 FOTR conducted a virtual Rain Garden Workshop with 197 live viewers through Zoom

Table 12. PEP #7

PEP #7: Promote and support volunteer activities	
Goal	
<ul style="list-style-type: none"> • Coordinate 4 workdays during permit cycle • ARC member communities will promote, participate or host volunteer and other watershed events 	
METRIC	STATUS
Workday sign-in sheets documenting volunteer attendance	<p>FOTR conducted 1 Workday on 8/30/18 at the Newburgh Pointe Grown Zone with 17 participants</p> <p>2020 – FOTR conducted 2 workdays, one at Plymouth Township Park with 6 volunteers and one at Plymouth Canton Educational Park – Canton High School with 15 students</p> <p>2021 – FOTR conducted 1 workday on 8/21/21 at Merriman Hollow with 32 participants</p>
Workday survey results	No surveys were conducted

PEP #7: Promote and support volunteer activities	
Report of ARC member communities that hosted, participated or promoted events	27 events were hosted/promoted by ARC member communities during 2017-2019. ARC member communities hosted, participated or promoted events more than 267 times during the reporting period.

Table 13. PEP #8

PEP #8: Promotion of and support for volunteer monitoring activities within the Rouge River Watershed	
Goal	
<ul style="list-style-type: none"> • Conduct 1 winter stonefly search, 1 bug hunt and 2 other volunteer monitoring training exercises annually • ARC member communities will promote, participate or host volunteer events 	
METRIC	STATUS
Monitoring events	Friends of the Rouge conducted monitoring training activities, 2 stonefly searches, 1 spring bug hunt, 2 fall bug hunts, frog and toad surveys, and fish monitoring from 2018-2019 and continued to complete monitoring events annually

Table 14. PEP #8

PEP #9: Rouge River Watershed Signage	
Goal	
<ul style="list-style-type: none"> • Develop at least 1 new sign or sticker during permit cycle • During first 2 years survey watershed signage for maintenance and future sign needs • Create map during permit cycle documenting survey results • Implement maintenance and/or new signage at high-priority locations during the first permit cycle 	
METRIC	STATUS
Complete at least 1 new sign/sticker or other item during permit cycle	2021 – New vehicle magnet designed with distribution in 2022
Number of signs/stickers or other items distributed annually	Planned for 2022
Survey results, map and recommendations during permit cycle	2020 – Survey completed 2021 – recommendations completed
Number of signs maintained and new signage installed during permit cycle	Planned for 2022/2023

2.6 Number of catch basins cleaned

There are 70,045 catch basins owned by permittees participating in the Collaborative TMDL plan. Of those catch basins, 44,327 were inspected or cleaned during the permit cycle. It is necessary for some communities to improve record keeping practices to better track catch basin inspections. Other communities need to increase the number of catch basins inspected annually.

Table 15. Number of catch basins cleaned

Permittee	Number of catch basins	Number of catch basins inspected/cleaned
Beverly Hills	1,724	800
Bingham Farms	12	2
Birmingham	251	251
Bloomfield Hills	530	530
Bloomfield Twp.	140	55
Canton Twp.	259	259
Dearborn Heights	6,696	600
Farmington	1,448	1,448
Farmington Hills	5,163	3,294
Franklin	64	12
Garden City	3,851	2,600
Inkster	2,752	250
Lathrup Village	440	10
Livonia	10,293	4,266
Melvindale	1,000	800
Northville	941	941
Northville Twp.	157	157
Novi	2,970	2,970
Oak Park	13	13
Plymouth	1,200	400
Plymouth Twp.	131	131
Redford Twp.	49	37
Southfield	3,000	3,000
Troy	17,849	17,849
Walled Lake	8	8
Wayne	3,089	1,236
West Bloomfield Twp.	82	82
Westland	5,358	1,756
Henry Ford College	245	245
Schoolcraft College	330	325
Wayne County Airport Authority (WCAA) - Willow Run Airport	Unknown	Unknown
Total	70,045	44,327

2.7 Miles of streets swept

Of the 2,534.5 miles of streets owned, 2,506.5 miles of streets were swept during the permit cycle. See Table 16.

Table 16. Miles of streets swept

Permittee	Miles of streets owned	Miles of streets swept
Beverly Hills	55	55
Bingham Farms	5.5	0
Birmingham	85	85
Bloomfield Hills	33	33
Bloomfield Twp.	NA	NA
Canton Twp.	NA	NA
Dearborn Heights	153	153
Farmington	35	32.5
Farmington Hills	305	305
Franklin	5 (with curbs)	5
Garden City	107	107
Inkster	105	105
Lathrup Village	28	26
Livonia	374	374
Melvindale	25	25
Northville	27	27
Northville Twp.	NA	NA
Novi	196	196
Oak Park	84	84
Plymouth	32	32
Plymouth Twp.	NA	NA
Redford Twp.	NA	NA
Southfield	250	250
Troy	327	327
Walled Lake	13	13
Wayne	57	57
West Bloomfield Twp.	NA	NA
Westland	215	215
Henry Ford College	NA	NA
Schoolcraft College	NA	NA
Wayne County Airport Authority (WCAA) – Willow Run Airport	NA	NA
Total	2,534.5	2,506.5

2.8 Number of stockpiles showing no impact to stormwater runoff

Of the 147 stockpiles that are located outdoors, only one had an impact to stormwater. This stockpile has been moved and the issue resolved.

Table 17. Number of stockpiles

Permittee	Number of stockpiles	Number of stockpiles showing no impact to stormwater
Beverly Hills	2	2
Bingham Farms	0	0
Birmingham	12	12
Bloomfield Hills	1	1
Bloomfield Twp.	7	7
Canton Twp.	3	2
Dearborn Heights	5	5
Farmington	5	5
Farmington Hills	3	3
Franklin	0	0
Garden City	6	6
Inkster	3	3
Lathrup Village	3	3
Livonia	0	0
Melvindale	5	5
Northville	5	5
Northville Twp.	1	1
Novi	9	9
Oak Park	3	3
Plymouth	5	5
Plymouth Twp.	7	7
Redford Twp.	9	9
Southfield	11	11
Troy	11	11
Walled Lake	5	5
Wayne	12	12
West Bloomfield Twp.	10	10
Westland	4	4
Henry Ford College	0	0
Schoolcraft College	4	4
Wayne County Airport Authority (WCAA) – Willow Run Airport	1	1
Total	151	150

3.0 Conclusions

These metrics indicate that progress is being made towards reaching goals that were designed to improve water quality in the Rouge River watershed. Progress is still needed to achieve Metric A: Success of the Collaborative IDEP Plan, and implementation of post-construction stormwater standards has been slow to take off due to delays in ordinance approvals. In addition, increased catch basin inspections and better record keeping of these inspections is necessary for some communities.

Attachment A

Participating ARC Members

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

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