

GUIDANCE FOR PREPARING MANAGEMENT PLAN

(Prepared by the Rouge Program Office, November 14, 1997)

Introduction

The first step in applying for coverage under the new MDEQ General Storm Water Permit is determining the hydrologic boundaries of the subwatershed, and the public agencies and communities that will participate in the preparation of a joint subwatershed storm water management plan. The individual agencies and communities who agree to participate in the development of a management plan can seek coverage under the terms of the permit for either the portion of their jurisdiction that lies within the identified subwatershed or for their entire jurisdictional boundary.

Some communities may chose to seek coverage for their entire political jurisdictional boundary since the adoption of ordinances, construction of facilities, education programs, illicit discharge inspections or other actions anticipated under the permit are easier to implement on a community wide basis (particularly if the entire community is within the Rouge River watershed). Other communities with only a small portion of their total area within the Rouge River watershed may choose to only seek coverage for that portion within the Rouge River watershed.

The subwatershed management plan must be completed and submitted to MDEQ for review within three years from the date coverage under the permit is authorized. MDEQ has also indicated that they may temporarily waive the requirement for a subwatershed storm water management plan if there are insufficient number of communities or agencies that apply within a single subwatershed to justify a joint planning effort. A plan would be required when a sufficient number of communities and agencies in the subwatershed subsequently seek coverage under the general permit.

Subwatershed Boundaries

Who Selects Subwatershed Boundaries?

- Cooperating communities and public agencies seeking coverage under permit.

Who Approves Boundaries?

- MDEQ has final approval on boundaries of subwatershed.

Other Consideration

- Hydrologic Boundaries - With possible minor exceptions the subwatershed should represent actual hydrologic boundaries.
- Data Resources - The information compiled by the RPO over the last four years on flow and to a certain extent on water quality is based upon specific hydrologic units. The

creation of watershed boundaries that do not substantially conform to existing data , may limit the availability and use of existing information.

Responsibility for Plan

Who is responsible for preparation of plan?

- Public agencies and communities applying for coverage under the general permit that own, operate or control storm water conveyances or facilities within subwatershed are responsible for preparing the plan.

Opportunity to participate

- All public agencies and communities within a subwatershed that are eligible for coverage must be given opportunity to participate.

Review of plan

- In addition to public review and opportunity to comment, the MDEQ must be given and opportunity to review and comment on plan. MDEQ does not approve or disapprove subwatershed management plans.
- MDEQ does approve Pollution Prevention Initiatives submitted by individual communities and public agencies and those initiatives must be consistent with the subwatershed management plan.

Plan Elements

Assess nature and status of watershed ecosystem

- The collective knowledge of the participants and the information already compiled by the Wayne County Rouge Program Office, USGS, MDEQ and other sources may provide sufficient information on which to assess the nature and status of the watershed (additional information needs may be identified and cited in this analysis).
- Two draft subwatershed reports have been prepared and each contains a baseline assessment that can be used as guidance.

Define short and long-term goals for the system

- The two draft subwatershed reports contain goals and objectives established by the communities and public agencies who participated in the planning process (an outline of

those goals were presented this morning and are contained in your notebooks).

Determine objectives and actions needed to achieve selected goals

- Again the draft subwatershed plans contain specific objectives, and in some cases action plans, that are directly related to the priority goals. These draft plans can be used as guidance; although, each subwatershed will have goals and objectives tailored to the priorities of the participating agencies and their citizens.
- The actions selected and identified in the subwatershed plan become the basis for preparation of individual Pollution Prevention Initiatives.

Assess benefits and costs of each action

- MDEQ has indicated that a detailed benefit/cost analysis is not required.
- An assessment of the benefits derived from the proposed actions compared to costs is required.
- If certain actions are rejected because of high cost compared to benefits, that information should also be included in this element.

Implement desired actions (schedule)

- The implementation schedule for the entire subwatershed shows how individual projects or actions by participants will be integrated to achieve both short term objectives and long term goals.
- The short term objectives should have specific dates for initiation of programs and activities that relate directly to the Pollution Prevention Initiatives required to be submitted by each participating agency or community.
- All agencies and communities within a subwatershed do not have to commit to do the same thing in the same time frame; the schedule needs to show how activities will be integrated to achieve common objectives.

Evaluate actions against goals (methods)

- The plan needs to contain a method for keeping track of how actions are progressing to meet the goals and objectives (some evaluations will require testing such as whether or not bacteria counts exceed a specific standard).

- Other acceptable evaluation techniques might include such things as number of inspections of septic tanks, number of communities passing certain types of ordinances, frequency of street sweeping or catch basin cleaning, number of grassy swales or other BMPs.
- The type of evaluation used will depend upon how the specific objective is set and the practical limitations of measuring results in water quality improvement over the short term.

Re-evaluate goals and objectives (process)

- The initial goals and objectives of the management plan need to be evaluated prior to the expiration of the first general permit coverage period.
- The management plan should identify the process that will be used to solicit input to reevaluate the goals and objectives based upon the effectiveness of programs conducted under the permit and comments received from participating public entities and other stakeholders.

Public Participation Process

What are the requirements?

- A Watershed Planning Public Participation Process that is submitted to the MDEQ for approval must have the consensus support of the public entities seeking coverage under the permit (the plan can have noted exceptions identified by communities or agencies and recorded in an appendix to the plan)
- Exceptions to consensus among the public agencies cooperating in the drafting of the management plan must be noted in an appendix to the plan and an explanation provided.

What should the public participation process contain?

- A person, group or agency responsible for coordinating the development of the Watershed Management Plan.
- A mechanism(s) for Public Participation in the group responsible for Watershed Management Plan development and finalization.
 - *public agency representatives* (public works department, drain commissioner office, planning and development department, road commission, etc.);
 - *citizen representatives* (citizen members of local planning commissions, park boards, neighborhood organizations, businesses organization,

- environmental/conservation organization, etc.);
 - *elected officials*; and,
 - *community resource volunteers* (teacher from college, university or local schools, retired professional, etc.)
- Mechanism(s) for Public Input (fact and perception finding) prior to finalization of management plan.
- Previous public survey findings, new public surveys, interviews, focus groups, public meetings, workshops.

Formal Approval Process

Who needs to approve plan at local level?

- Management plans need to be formally adopted or approved by the responsible public body or public official with statutory or delegated authority to accept responsibilities and obligations under the NPDES permit.
- Actions by public bodies to approve the management plan would be subject to the Michigan Open Meetings Act requirements.

Note: This guidance for preparation of management plans is meant to supplement information contained in the General Permit No. MIG610000, permit application, and Guidelines for the Voluntary Storm Water Discharge NPDES Permit prepared by MDEQ which officially describe the complete legal requirements.