



James W. Ridgway, P.E.
Executive Director

June 22, 2012

Ms. Hae-Jin Yoon
District Supervisor, Water Bureau
Michigan Dept. of Environmental Quality
27700 Donald Court
Warren, MI 48092

Dear Ms. Yoon:

The ARC has addressed all of the “Required Changes” addressed in MDEQ’s letter dated April 16, 2012. Below is a summary of our response to each item. In addition, many of the “Recommended Improvements” were also addressed. Lastly, we have added a symbol to the Action Tables (Figures 6-23 – 6-31) to identify projects that address priority pollutants in critical or priority protection areas.

1) Pgs. 3-3, 4-2: *The WMP states that the designated uses of Agriculture and Industrial Water Supply are “N/A.” Please note that all surface waters of the state are protected for these designated uses and these uses are occurring in the watershed. Please correct.*

» This has been corrected.

2) *Specific actions are needed to address the dissolved oxygen TMDL in Johnson Creek.*

» A TSS assessment study has been added to the Middle 1 Action Table (1st item in Figure 6-28) to determine the areas that should be targeted for sediment reduction. In addition, Northville Twp already has listed seven green infrastructure projects that –when implemented–will reduce the sediment load. In addition, Johnson Creek was added to the sediment critical area map. We believe these items address the DO TMDL.

3) *Chapter 4, Table 4-2:*

a) Several items in table 4-2 identify the critical area as watershed wide. Critical areas are areas that are contributing the greatest amount of a pollutant. The modeling results can be used to help identify the areas contributing the greatest amount of a pollutant. Please modify as appropriate. Critical areas should be mapped.

» The term “Critical Areas” was inappropriately used in this table. The table heading has been changed to “Extent of Impact” and identifies the suspected geographic area that is impacted by the sources/causes. Critical areas are now only identified in Chapter 6.

b) How were the critical areas identified? They don’t seem to match up w/ critical areas in Tables 6-2 (sediment) or the Pathogen priority areas (1st, 2nd, CSO/SSO).

» See response above.

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

Cooperating Partners:

Cranbrook Institute of Science
Friends of the Rouge
Rouge RAP Advisory Council
Southeastern Oakland
County Water Authority
Wayne State University

c) *Failing septic systems are identified as a source in “all communities with septic systems.” Have these areas been identified? If so, please include at least a list, if not a prioritized list.*

- » A list of communities with septic systems has been included in Chapter 2 and is now referenced in Table 4-2.

d) *The BMP associated with Failing OSDS, SSOs, and cross connections is “Discharge Prevention Practices (ARC IDEP/TMDL Plan).” It would be more useful to list specific BMPs, please revise.*

- » This phrase was removed and the following BMPs were added, as appropriate:
 - Wet Weather Storage
 - Downspout Disconnection
 - Inflow and Infiltration Management
 - OSDS Ordinance Updates (Oakland County)
 - Intensive Sampling
 - Dye Testing
 - Sewer Inspections
 - Funding Mechanisms for System Replacement or Sewer Tap-in to aid homeowners

e) *“Unsatisfactory infrastructure maintenance” is identified as a cause of pathogens. There are no critical areas identified and the BMPs don’t seem to make sense for this cause. Please revise.*

- » This cause was associated with the source: resuspended sediment. The source and impacted area (which were not viewable in the table) were added to the table. The BMPs are appropriate for this source. Critical areas were addressed in Chapter 6.

f) *“Lack of Buffer strips” is identified as a BMP for water volume and rate and sediment. Please delete “lack of.” “Poor tilling practices” is identified as a BMP for sediment. Please delete “poor.”*

- » This has been corrected.

g) *“Lack of a viable soil erosion & sedimentation control program” is identified in the table as cause of sediment watershed wide. The narrative of Chapter 4 elaborates on certain sources of identified pollutants, but does not include a discussion on this item. If this is an issue watershed wide, it warrants discussion and a plan for correction. If there are particular programs that need improvement, they should be identified.*

- » This is identified as a potential cause. We are unaware of specific areas with deficient SESC programs. A footnote has been added to the table to clarify this.

4) P. 6-3: *What is the specific plan for the 1st, 2nd and CSO/SSO pathogen priority areas? The WMP states that the “Action Strategies section of the Plan outlines in more detail the activities that will be performed.” Is this a reference to the collaborative IDEP? If so, it should be included in the appendix. Also, please review this section to determine if the timeframe associated with the activities needs to be revised.*

- » This statement was removed and the following detail was added: *The IDEP activities include intensive sampling to narrow down areas with elevated E. coli, then smoke testing, dye testing and/or storm sewer inspections to narrow down sources of human sewage. PEP*

activities include advertising the pollution hotline numbers and distributing storm sewer awareness information. In addition, the timeframe was extended to 2015 for 1st priority areas and 2020 for 2nd priority areas.

5) Please confirm that Table 6-1 applies to non-priority pathogen areas. How does this table differ from Table 4-2? More specificity is needed in regards to: "all communities with septic systems"; "SSO communities"; and "areas with high impervious levels and stream bank erosion sites." Also, education is not the only appropriate BMP for agricultural sources; the list should include some physical BMPs as well.

- » This Table refers to the critical areas for pathogens. See response from item 3 above. Specific communities are listed for each source where information is available. Ag BMPs were added to the table.

6) Table 3-10, p. 3-39, and similar tables for other sub-watersheds: Remove the fecal coliform data; bacteria "loads" are nonsensical. Also remove the figures of these data; 3-18, etc.

- » As difficult as it is to make sense of bacteria loads, these loads are specified in the E. coli TMDL for the Rouge; therefore, we left the tables in the Plan.

7) Volume of water is identified as significant in the plan yet critical areas for water volume are not identified. If possible, please identify critical areas for volume reduction.

- » Critical SWMA areas were added based on backfull frequency and amount of volume reduction needed in each SWMA.

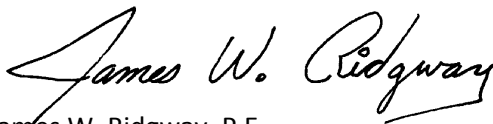
8 - 11) BST Comments: certain data was missing from the figures depicting the BST results.

- » These figures were previously updated, but failed to be added to the plan. They are now included to the plan.

If you have any questions, please feel free to contact me at 313-963-6600.

Sincerely,

ALLIANCE OF ROUGE COMMUNITIES



James W. Ridgway, P.E.
Executive Director