

Responses to February 16, 2006 MDEQ Comments
The Ecorse Creek Watershed Management Plan
May, 2006

On February 16, 2006, MDEQ provided comments on the Ecorse Creek Watershed Management Plan (ECWMP) as submitted to MDEQ on October 31, 2005. The ECWMP has been revised in response to those comments. The MDEQ comments, followed by notes on how they have been addressed, are listed herein. (Enclosed with this letter is one copy of the ECWMP with MS Word "Track Edits" turned on for most of the changes made, to assist in the MDEQ review.)

- Executive Summary – Consider adding page numbers.
 - **Page numbering has been added.**
- Executive Summary – Desired Use Table: Please clarify why you do not know if aesthetics and recreational areas are threatened or impaired. Should the uses that are marked "unknown" be marked "Not Applicable" instead?
 - **Revised Desired Use Table to list Aesthetics and Recreational Area as "Threatened".**
- Map 1-1: Map that shows watershed boundaries should also contain the location of surface waters. If no other surface waters exist, please ignore this comment.
 - **Map 1-1 shows the location of streams, and watercourses, based on currently available GIS data.**
- Pg. 2-2: Clarify what the reference "Ibid" is referring too.
 - **"Ibid" is a term used in footnoting, which refers to "the previous footnote". Where a series of "Ibids" follow each other, each refers back to the "prior" footnote – hence back to the first preceding complete reference footnote.**
- Map 2-4: Include legend for colors.
 - **Color key has been added.**
- Pg 4-4, Section 4.2: The 2nd paragraph states "Uses were determined to be impaired or threatened based on previously written reports and field observations". Please indicate what reports this reference is referring too.
 - **Clarification and footnotes have been added.**
- Pg. 4-4, Table 4-2: Recreational Areas is listed as "unknown" in the table, but the description on page 4-5 indicates that listing it as unknown is possibly not the best option. Please re-evaluate this desired use ranking.
 - **Revised table to list Recreational Areas as "Threatened".**
- Table 6-1: Table should only include the "Currently Doing", "Short-Term", "Intermediate-term", and "Long-Term" actions that the municipalities have committed too, or the table

should clearly indicate which actions are the commitments. Having “Desired Projects” and “Additional Actions” in the table makes it look like they are commitments.

- ***Prior Table 6-1 has been broken into two tables: Table 6-1 – containing Phase II “required” activities (commitments); and, Table 6-2 – containing non-Phase II additional actions (non-commitments). Wording in Section 6-1 also modified.***
- Table 6-1 and Action Items Summary: Because of their approved IDEP and permit requirements, commitments made in each permittees IDEP and PEP, if included in the WMP, should also be commitments. Communities should either be “currently doing” or have “planned for short term” the following actions (please list NA if a Management Alternative is not applicable for a permittee):
 - Outfall screening program
 - Develop a reporting system/follow-up plan for illicit connections
 - Staff training to identify illicit discharges
 - Minimize seepage from sanitary sewers
 - Minimize seepage from on-site sewage disposal systems (unless N/A because there are no OSDS)
 - Update outfall and/or drainage system map based on field observations (annually)
- ***Additional information solicited from entities, and Tables and Action Items Summary (Entity specific pages) have been updated as much as possible based upon information provided. Any “information” still missing will need to be addressed by the individual entities as part of their SWPPI submittals.***
- Table 6-1: Include estimated costs for the following activities or indicate why it is not applicable:
 - Bank stabilization/restoration: S. side of North Branch Melvindale – owned property
 - Improve Hydraulic capacity: Sexton-Kilfoil at Emmons Street bridge
 - All “Additional” activities
 - Managerial – Ordinances & Policies: Review/revise septic siting and spacing requirements
- ***Responses (either cost information, or other notations) added in Tables 6-1 and 6-2.***
- Table 7-2: Numbering of watershed goals is incorrect. The number 3 is skipped.
 - ***Table 7-2 modified. Goal #3 added.***
- Table 7-2: For Goals 4 and 5, we would like to see you add "Instream habitat score" to the Parameter Measured column. For the Measurable Goal/Target column you could either use "Good scores > 105 in two or more consecutive years of monitoring" or "Marginal scores > 80 in two or more consecutive years of monitoring". For the Evaluation Method column, add "MDEQ Procedure 51" (since you are already using Procedure 51 for Macroinvertebrates, you can easily do habitat evaluation also).
 - ***Table 7-2 modified. Additional information also added.***
- Section 8.4.1, Page 8-4: This section reads “A number of possible opportunities/models exist that could be implemented. Some of these are summarized in the following material.”

There needs to be an indication as to what method(s) mentioned will be used to institutionalize watershed protection in the Ecorse Creek.

- ***“Update Comments” section added at end of Chapter 8 to indicate that ECIC is considering possible formation of Watershed Alliance Organization.***

The following Short-Term Objectives should be more “measurable”:

- Preserve and restore wetlands and open space
- Construct storm water basins
- Improve drain capacity in streams
- Preserve and enhance native vegetation/naturalization
- Improve media coverage
- Reduce directly connected storm water discharges to sanitary systems
- Improve education and awareness of watershed successes and failures
- Reduce secondary health concerns related to flooding

- ***Table 7-2 modified. Additional information also added.***

If a Short-Term Objective is applicable throughout the entire watershed, every permittee having an impact on that objective will need to commit to a relevant action(s). In our review process it was sometimes difficult to tell if an action met an objective, therefore we recommend including the objectives that are met (possibly by using a numbering system) next to each action on the Action Items Summary sheets for each permittee. This will help with the re-review process and also make it clear to the permittees and the public as to which objective(s) are being met by each action. Making the connection from actions to short-term measurable objectives is an important aspect of meeting permit requirements.

- ***New Table 6-3 “Summary of Phase II Management Alternatives By Objective” added.***

All permittees need to include actions (commitments) to address the Short-Term Objectives for:

- Goal 3: Watershed Management Sustainability
 - Establish institutional relationships to ensure plan implementation
 - Develop adaptive and iterative management
 - Develop long-term funding methodologies
- Goal 6: Preserve, Increase, and Enhance Recreational Opportunities
 - Encourage recreation and open space planning in site plan/land use approval process
 - Protect and improve riparian corridor aesthetics
 - Obtain land for wetlands and passive parks
 - Increase public access to stream corridors

- ***New Table 6-3 “Summary of Phase II Management Alternatives By Objective” added. Any “information” still missing will need to be addressed by the individual entities (as applicable) as part of their SWPPI submittals.***

Permittee Specific Comments

It is not clear if Allen Park, Dearborn Heights, Inkster, Lincoln Park, Melvindale, Romulus, Southgate, Taylor, Westland, Wyandotte and Wayne County have actions (commitments) to meet the following short-term objectives:

- Improve understanding of stream flow volumes and distribution

- Preserve and restore wetlands and open space
- Improve drain capacity in streams (Romulus and Taylor meet this objective)
- Preserve and enhance native vegetation/naturalization
- Establish institutional relationships to ensure plan implementation
- Develop adaptive and iterative management
- Protect, expand, and restore the riparian corridor
- Encourage recreation and open space planning in site plan/land use approval process
- Protect and improve riparian corridor aesthetics

➤ ***New Table 6-3 “Summary of Phase II Management Alternatives By Objective” added. Any “information” still missing will need to be addressed by the individual entities (as applicable) as part of their SWPPI submittals.***

It is not clear if Inkster, Lincoln Park, Melvindale and Wyandotte have actions (commitments) to meet the following short-term objective:

- Improve erosion and sedimentation controls

➤ ***New Table 6-3 “Summary of Phase II Management Alternatives By Objective” added. Any “information” still missing will need to be addressed by the individual entities (as applicable) as part of their SWPPI submittals.***

It is not clear if the Wayne County Airport Authority has actions (commitments) to meet the following short-term objectives:

- Preserve and enhance native vegetation/naturalization
- Establish institutional relationships to ensure plan implementation
- Develop adaptive and iterative management
- Protect, expand, and restore the riparian corridor
- Improve erosion and sedimentation controls
- Protect and improve riparian corridor aesthetics

➤ ***New Table 6-3 “Summary of Phase II Management Alternatives By Objective” added. New Table 6-3 “Summary of Phase II Management Alternatives By Objective” added. Any “information” still missing will need to be addressed by Wayne County (as applicable) as part of their SWPPI submittals.***

Ecorse

- There is currently no information for Ecorse throughout the plan (including Table 6-1 and on the Phase II activity pages for each community. The City of Ecorse submitted their IDEP and PEP in January 06 for review. The plans have not yet been reviewed or approved. Information and commitments for Ecorse will need to be added to the plan.

➤ ***Information was added for Ecorse, to the extent provided by Ecorse. Any additional missing information will need to be address by Ecorse with their SWPPI submittal.***

Federal 9 Minimum Elements of Watershed Planning
Watershed: Ecorse Creek
Plan(s): Ecorse Creek WMP
Reviewed by: Bob Sweet & Peter Vincent 2/14/06

a. An identification of the causes and sources or groups of similar sources that will need to be controlled to achieve the load reductions estimated in this watershed-based plan (and to achieve any other watershed goals identified in the watershed-based plan). Sources that need to be controlled should be identified at the significant subcategory level with estimates of the extent to which they are present in the watershed.

X Plan(s) meets requirement as demonstrated: **sources & causes described in section 4.4 pg 4-6 table 4-3 & pg 4-10-4-12 table 4-4. Quantification found in chapter 2 & 5 and Appendix G.**

➤ ***Plan meets requirement – no changes required.***

b. An estimate of the load reductions expected for the management measures described under paragraph (c) below. Estimates should be provided at the same level as in item (a) above.

Plan(s) meets requirement as demonstrated: **pg 5-36 section 5.6, TSS- pg 5-37 table 5-9**

X Plan(s) Does Not meet requirement. The following addition information is required. **Load reductions do not meet TMDL required reductions. There are no reductions for many BMPs and no reduction are associated with the following identified known or suspected pollutants- unstable hydrology, nutrients, pathogens, and low DO.**

➤ ***Chapter 5 expanded to include additional information (starting on page 5-31): TMDL load reductions was addressed; Maps 5-6 and 5-7 and associated discussion added to address other pollutants; Discussion was added relative to hydrology issue.***

c. A description of the NPS management measures that will need to be implemented to achieve the load reductions estimated under paragraph (b) above (as well as to achieve other watershed goals identified in this watershed-based plan), and an identification (using a map or a description) of the critical areas in which those measures will be needed to implement this plan.

Plan(s) meets requirement as demonstrated: **Chapter 5 pg 5-4 - 5-5-25 identify management measure to be employed. Preventative practices, LID, and ordinances are identified in this section. Critical areas for erosion, flooding, algae and debris are identified pg-5-32 map pg 5-33. TSS critical areas are identified on page 5-44- 5-45 and Figure 5-5 (pg 5-46)**

X Plan(s) Does Not meet requirement. The following addition information is required. **no critical area identified for pathogens DO or unstable hydrology (areas that flood do not necessarily indicate unstable hydrology). Debris build up critical area is identified but it is not identified as a pollutants.**

➤ ***Chapter 5 expanded to include additional information (starting on page 5-31): TMDL load reductions was addressed; Maps 5-6 and 5-7 and associated***

discussion added to address other pollutants; Discussion was added relative to hydrology issue.

d. An estimate of the amounts of technical and financial assistance needed, associated costs, and/or the sources and authorities that will be relied upon, to implement this plan.

X Plan(s) meets requirement as demonstrated **pg-6-4 thru 6-11 table 6-1.**

Plan(s) Does Not meet requirement. The following addition information is required. **It would be beneficial to have estimates of total cost per item. For example on page 1 of 7 of table 6-1 brochures are listed a costing \$0.5 but there is no indication as to the number to be printed and distributed. It also be desirable to have an estimate of the total cost.**

➤ ***Responses (either cost information or other notation) added to all items in Tables 6-1 and 6-2. In some cases, “n/a” is listed – since information is currently unavailable on potential quantities that may be used across the Watershed, and hence the estimated annual costs cannot be projected.***

e. An information/education component that will be used to enhance public understanding of the project and encourage their early and continued participation in selecting, designing, and implementing the NPS management measures that will be implemented.

X Plan(s) meets requirement as demonstrated: **Chapter 9 & See PPP as referenced in section 9.2.**

➤ ***Plan meets requirement – no changes required.***

f. A schedule for implementing the NPS management measures identified in this plan that is reasonably expeditious.

X Plan(s) meets requirement as demonstrated: **pg 6-5 - 6-39 & pg 6-4 table 6.1 identifies management measure to be employed by jurisdiction and the time frame they are to be incorporated.**

➤ ***Plan meets requirement – no changes required.***

g. A description of interim, measurable milestones for determining whether NPS management measures or other control actions are being implemented.

Plan(s) meets requirement as demonstrated: **Quantitative measures-pg 3-4 table 3-1 establishes baseline conditions and pg 7-6 table 7-2 establishes measurable goals. Qualitative measure- pg-7-3 table 7-1.**

X Plan(s) Does Not meet requirement. The following addition information is required. **Quantitative/Qualitative measures do not have interim goals or interim time frames establish to evaluate progress. This should be the administrative bean count of what is happening for example: X stream banks fixed by year 5.**

➤ ***Revisions were made to Chapter 7, starting in Section 7.2.3 (page 7-5). Table 7-2 revised and expanded. A new Table 7-3 was added to provide an indication of entities indicating a particular action is projected as current, short-term (0-3 years), intermediate-term (0-5 years) or long-term (greater than 5 years). The number of entities doing the action(s) provides the currently best available method for “administrative bean counting”.***

h. A set of criteria that can be used to determine whether loading reductions are being achieved over time and substantial progress is being made towards attaining water quality standards and, if not, the criteria for determining whether this watershed-based plan needs to be revised or, if a NPS TMDL has been established, whether the NPS TMDL needs to be revised.

X Plan(s) meets requirement as demonstrated: **pg 7-6 table 7-2 outlines targets to evaluate reductions of NPS pollutants. Table could include a column with current levels.**

➤ **Table 7-2 revised and expanded – a “Current Condition” column was added, along with other additional information.**

i. A monitoring component to evaluate the effectiveness of the implementation efforts over time, measured against the criteria established under item (h) immediately above.

X Plan(s) meets requirement as demonstrated: **pg 7-6 table 7-2 it is thin but meets the criteria.**

Plan(s) Does Not meet requirement. The following addition information is required.

1) **No monitoring activity for nutrients is identified but it is identified as impairment for aquatic life/wildlife and a threat to warm water fishery.**

➤ **Table 7-2 revised to include additional information, including reference to Total Phosphorus monitoring. Also, additional verbiage was added regarding available Downriver Stream Team monitoring capabilities (see Pg 6-47).**

2) **What methods will the stream team use, when and where will they be monitoring? Will they monitor specific sites or will their monitoring be watershed wide?**

➤ **Table 7-2 provides some details on monitoring. Specific locations and frequency, along with details of the potential Downriver Stream Team participation on behalf of the Watershed, are one of the details being addressed during discussion precedent to formation of the proposed Watershed Alliance Organization for the Downriver Watersheds (see discussion in Chapter 8, page 8-9). Specific sites will most likely be selected as indicators of watershed wide conditions.**

3) **Will indicators or segregates be used?**

➤ **Table 7-2 summarizes probable parameters to be used. In some cases, direct measurements of the specific parameter will be used. In others, “indicator parameters” will be utilized.**

General Comments

Figure numbers or page numbers are included on maps.

➤ **“Figure No.” or “Map No.” have been added to all figures and maps.**

Title of maps should be at the top of page not the name of WMP.

➤ **The Map Title locations have not been changed. Each Map has “Map No.”, “Map Title” and the “Watershed Name” included on it.**