

STORM WATER MANAGEMENT PLAN

FOR



**PREPARED IN COMPLIANCE WITH
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY**

PHASE II STORM WATER REGULATIONS

**GENERAL STORM WATER PERMIT
MIS040000**

and

**CERTIFICATE OF COVERAGE
MIS040051**

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Section I - Introduction and Background

1.1 Purpose of the Storm Water Management Plan (SWMP)

The City of South Lyon has developed a SWMP which is designed to reduce the discharge of pollutants from the storm water drainage system to the maximum extent practicable (MEP), to protect the designated uses of the waters of the State, to protect water quality, and to satisfy the appropriate water quality requirements of the Federal and Michigan Water Pollution Control Acts. The SWMP consists of a discussion of each of the six minimum measures along with an outline of the tasks, best management practices (BMPs), and schedules that the City must fulfill for meeting the permit requirements of each measure. A summary of that information, along with measures to determine the success of the program, is presented in Section VIII of this SWMP.

The six minimum measures include a Public Education Plan (PEP), a Public Involvement/Participation Plan (PIPP), an Illicit Discharge Elimination Plan (IDEP), a Post-Construction Storm Water Management Program (P-CMP), a Construction Site Storm Water Runoff Control Program (CRCP), and a Pollution Prevention and Good Housekeeping Plan (PPGHP).

1.2 The Federal Storm Water and Phase II Regulations

In the late 1980's, the U.S. Environmental Protection Agency (EPA) promulgated regulations addressing storm water discharges. Phase I regulations took effect in 1990 and required separate storm sewer communities with populations greater than 100,000 to obtain National Pollutant Discharge Elimination System (NPDES) permits and to implement storm water control practices. On December 8, 1999, the USEPA published Phase II storm water regulations. These Phase II regulations apply to smaller communities that are part of a contiguous urban area.

The Phase II regulation specifically identifies Oakland County as one of the "Incorporated Places and Counties Proposed To Be Automatically Designated Under The Storm Water Phase II Proposed Rule." The regulation applies to the City of South Lyon as a community which is not specifically designated, but which meets the population criteria and is contiguous to an urbanized area. It is the Federal regulations which require regulated storm water communities to obtain an NPDES permit and to develop plans for implementation of the "six minimum measures" for storm water management.

1.3 The State General Storm Water Permit

To facilitate addressing nonpoint sources of pollution commonly associated with storm water runoff, the Michigan Department of Environmental Quality (MDEQ) developed a General Wastewater Discharge Permit for Storm Water Discharges from Separate Storm Water Drainage Systems (MIS040000; Jurisdictional Option). MDEQ's general permit is consistent with the Phase II federal regulations and also requires permittees to develop and implement plans for the six minimum measures. The City applied for their permit on February 26, 2003, and was issued their Certificate of Coverage (COC), No. MIS040051, on December 18, 2003, which authorized the City to discharge storm water to the separate storm sewer systems under their jurisdiction. The certificate expires on April 1, 2008, at which time the certificate may be modified, terminated, reissued or revoked as allowed for in General Permit No. MIS040000.

1.4 MDEQ Reporting

As outlined in the City's COC, the first Annual Report is due with the submittal of this SWMP on December 1, 2004. The first annual report will document the progress made towards beginning or completing the tasks outlined in this SWMP for Year 2004. The City of South Lyon will also develop a documentation and tracking system to evaluate the six (6) minimum requirements on a semi-annual basis to determine progress made towards meeting the objectives described in the following sections and to make changes in objectives as warranted. They will prepare progress reports for the MDEQ of activities completed and proposed revisions. The annual and mid-year progress reports will be submitted to the MDEQ's Water Division Southeast Michigan District Supervisor.

1.5 Review and Modification

This SWMP is a living document, meaning it will likely be modified many times as a result of public input and as program successes and failures are realized over time. Any request for modifications, additions or deletions of tasks to be completed by the City must be documented to the MDEQ. Any changes, unless noted otherwise by the Department, are approved within 60 days of request submittal to the MDEQ.

1.6 City Contact for SWMP

Staff Contact: Mr. Steve Renwick
Title: Superintendent, Department of Public Works
Telephone: 248.437.6914

1.7 Background on the City

The City of South Lyon covers approximately 3.7 square miles in southwestern Oakland County. Originally established as an agricultural center built around two railroads, the City was incorporated in 1930. The center of its business district is at Ten Mile Road and Pontiac Trail. Figure A-1 (Appendix A) is an aerial photograph of the City that shows major roads, features, nested jurisdictions and the major drains and water bodies. The City limits are shown in red. The City has a total population of 10,036 as determined in the 2000 census. The entire City falls within the "urbanized area" (Figure A-2, Appendix A) and thus the storm water regulations apply to all the public municipal separate storm sewer systems (MS4s) within the City limits. The 2000 census indicated that 97% of the population was Caucasian and that 27.1% of the population has a high school diploma and 38% have a college degree. It is interesting to note that 64% of the population has moved at least once since 1995, so many of the residents may be new to the area and unfamiliar with the water resources in the area—an ideal target group for the City's public education and involvement efforts. The City is a community that is fairly homogeneous economically, ethnically, socially and culturally.

The major employers in the City are the South Lyon Community Schools, the City, Michigan Seamless Tube, and Farmer Jack.

Some of the organizations active in the community are the South Lyon Chamber of Commerce, the South Lyon Area Recreation Council, the Center for Active Adults, Active Faith, Kiwanis, Lions Club and the Salem-South Lyon District Library.

1.8 The Nested Jurisdictions

There are three nested jurisdictions within the City of South Lyon. They are the South Lyon Community Schools, the Oakland County Drain Commissioner (OCDC) and the Road Commission of Oakland County (RCOC). All three have applied for Phase II Certificates of Coverage. The school district consists of one high school, two middle schools, seven elementary schools and an administration building. The high school, both middle schools, and two of the elementary schools, Bartlett and Sayre, as well as the administration building, are within the City limits of South Lyon. The other five elementaries are located in Lyon Township, Green Oak Township, Salem and New Hudson. The high school and middle schools have campus-type layouts with separate storm sewers that meet the criteria of a “system” as discussed in the federal and state regulations and thus are subject to the Phase II regulations. Both campuses have potential for contamination of storm water runoff from large parking lots and from maintenance operations at the facilities, grounds, and athletic fields. The high school (Eleven Mile and Lafayette) houses over 1900 ninth through twelfth grade students and the middle schools (both at Nine Mile and Pontiac Trail) serve the district’s 1,600 sixth through eighth graders.

The OCDC and the RCOC have a number of storm drains within the City and the City is committed to working with these agencies and the schools to coordinate and integrate efforts, where applicable, to implement the minimum measures.

1.9 The Storm Sewer Systems within the City

The Yerkes Drain, Sayre Drain, South Lyon Drain No. 1, Lyon No.1 Drain and the Underhill Drain are the main watercourses that flow through the City (Figure A-1, Appendix A). They are all open drains. They are part of the Huron River Watershed and are tributary to Limekiln Lake and then Strawberry Lake. Strawberry Lake has a Total Maximum Daily Load (TMDL) for phosphorus. The TMDL is currently being met as the in-lake concentration (0.025 mg/l), loading capacity (17,100 lbs/yr) and point source load (5,877 lbs/yr) are below the TMDL goals (in parentheses). The May 2000 TMDL report recommends a 15% reduction in the nonpoint source load, which is currently about 13,781 lbs/yr. The report indicates that much of the reduction will occur through activities being done by the Huron River Watershed Council (HRWC) in the Kent Lake and Limekiln Lake watersheds. The City of South Lyon’s SWMP is designed to reduce pollutants, including phosphorus, to the MEP and thus will contribute to the continued attainment of the TMDL. The Yerkes Drain is on the TMDL list (Year 2013) for water quality standard (WQS) exceedances for dissolved oxygen (DO) (WBID#: 061206V). The affected reach is 0.7 miles in length and extends from Nichwaugh Lake upstream to the South Lyon Waste Water Treatment Plant (WWTP).

The City of South Lyon has separate sanitary and storm sewer systems with less than 1% of the City’s residences being served by on-site sewage disposal systems (OSDS).

The separate storm sewer system in the City consists of storm sewers under the ownership and/or jurisdiction of several different entities, namely, the RCOC, the OCDC, private entities, the City of South Lyon, and the South Lyon Community School District. For example, approximately 2.66 miles of primary roads and 0.99 miles of secondary roads in the City, and associated right-of-way drainage systems, are under the jurisdiction of the RCOC.

Section II - Public Education Plan

2.1 Public Education Plan (PEP) Objectives

The purpose of the PEP is to inform the City residents, public employees, businesses, industries, visitors to the area, and construction contractors and developers about their water resources and instill in them a sense of stewardship concerning those resources. The primary objective of the plan is to promote, publicize, and facilitate watershed education and, in doing so, encourage the public to reduce the discharge of pollutants in storm water to the MEP.

The general objectives of the PEP are to:

1. Increase the general awareness among residents, local businesses, and agency officials of the City storm sewer system and the Huron River Watershed and how their daily activities impact this resource.
2. Inform the public and interested parties of the storm water permit, the Storm Water Management Plan, and the objectives of the program.
3. Meet the required elements of an education plan as outlined in the permit.
4. Develop and implement public involvement and education programs, materials, and activities for the citizens in the community to build awareness and foster stewardship of their water resources. The City will utilize existing programs and materials where appropriate.
5. Support the students, groups, or individuals in the community that are participating in existing educational efforts and encourage the development of and participation in additional efforts.

The land use in the City in part dictates the focus of the education program. According to the Southeast Michigan Council of Government's (SEMCOG's) 2000 land use data, the City is primarily a residential community (50%), but it does have a commercial strip along Pontiac Trail (4%) and there is some industry within the City (4%). 19% of the land use is woodland, wetland, grassland or shrub, and 4% remains as active agriculture. Sanitary sewer serves most of the City, but there are four small areas where residents are known to have septic tank/tile field systems. There is still some undeveloped land available within the City limits.

Given the land uses, the primary concerns for storm water contamination would be residential and commercial sources. Some of the residential sources of contaminants would be illicit connections, new construction or reconstruction, yard maintenance and landscaping, and household hazardous waste disposal. Commercial sources would include waste automotive fluids, restaurant waste and grease, and car wash and laundry wastes. The City's public education will be geared to address these potential sources. Below is a list of educational topics and target audiences that the City will consider addressing.

Topics	Target Audience
Yard Wastes	Residential and City staff
Landscaping	Residential, Commercial, Developers, Schools and City staff
Low-Impact Development	Residential, Commercial, Developers and City staff
Pet Wastes	Residential, Commercial and City staff
Detention/Retention Basins	Developers and City staff
Household Hazardous Waste	Residential and City staff
Restaurant Wastes	Commercial, Schools
Automotive Wastes	Commercial, Residential, and City staff
Illicit Discharges and Connections	All
Fertilizer Use	Residential, Commercial, Schools and City staff
Pollution Prevention for Business	Commercial and City staff
Pollution Prevention for Households	Residential
Septic Tank/Tile Field Maintenance	Residential
General Watershed Information	All
Information on Sewer Systems	All
Sedimentation and Erosion Control	Commercial, Developers, Schools and City staff
Wetland Protection	All

The City currently has a public education program for their Wellhead Protection program, and the City does have some existing means and avenues of providing information to the residents and business owners within the community. They are listed below. These will be utilized to the fullest extent possible when implementing this education plan.

Type	Size	Frequency	Delivery	Comments
City Newsletter	4-6 pgs	2-3 times/year	Mailed to all residents	
Utility Bills	Postcard	4/year	Mailed to homeowners	Water Bills
Well Head Protection Program flyer		As needed	Mailed to all residents	
Cable TV		Emergency		After system upgrade
City Website		Continuous updating	All internet	www.southlyonmi.org
South Lyon Herald		Weekly Publication	Mail; Purchase	
Ann Arbor News		Daily Publication	Home delivery; Purchase	
Information Shelf (City Hall)		Continuous updating	Pickup	
RRRASOC		As needed	Internet; Pickup	www.rrrasoc.org

The City will attempt to work with other organizations and agencies in the public education effort and utilize or modify existing materials where possible. Some of the potential partners and/or sources of

information include: Huron River Watershed Council (HRWC), SEMCOG, Resource Recovery and Recycling Authority of Southwest Oakland County (RRRASOC), MDEQ, Friends of the Rouge, Wayne County Rouge Program Office (RPO) and the Michigan State University-Extension Office (MSU-Ext).

2.2 Planned Efforts

South Lyon is located in the headwaters of the Huron River Watershed. Small streams and drains that are tributary to the river flow through the City. Many people may not be familiar with their connection to the watershed due to the nature and size of these tributaries. To overcome this, the City will focus education efforts on conveying basic concepts of “watershed awareness” and “individual actions affecting the watershed.” These efforts will be targeted at City staff, home and business owners, as well as commercial operations and developers.

The following are the City’s priorities:

- Meeting the required elements of the permit.
- Educating the public and City staff on the watershed and on the impacts of illicit connections.
- Develop partnerships with other community organizations, groups, or agencies involved in educating the public regarding storm water management and provide general information to the public.
- Formation of a focus group or utilization of an existing group such as the focus group for the Wellhead Protection Program to advise the City on their public education efforts and storm water management program.

The following paragraphs summarize the seven (7) required elements of a PEP as specified in the MDEQ General Storm Water Permit and the City’s plan for addressing each element. The City is committed to completing activities in all seven of the required elements within five years of COC issuance. Possible additional tasks and future activities are listed under each element, as well. The information and actions encouraged by the PEP will be consistent with the regulations and City objectives. The tasks, measures, and implementation schedules are presented in Table 8.1 (Section VIII).

1. *Encourage the public to report illicit discharges or improper disposal of wastes into storm sewers.*

Task II-1.1: **Design and implement an education program for City field staff on illicit discharge and illicit connection elimination.**

Target Audience: Field crews and facility maintenance staff of the City

Messages: Recognition of illicit connections and discharges, methods to detect them, their impact on water bodies, and methods to eliminate them.

Description: PowerPoint and/or video training with some hands on recognition.

Responsibility: Department of Public Works

Measure: Documentation of training program and records.

Schedule: Start within 2 years of COC issuance and periodic thereafter.

Task II-1.2: Use and encourage public use of the existing OCDC complaint receipt and response system.

Target Audience: General public

Messages: How to recognize and report suspected illicit connections and discharges.

Description: The City will utilize the existing County-wide complaint hotline that is operated and maintained by OCDC. The City will advertise the complaint system telephone number (248.858.0931) and e-mail address (http://www.co.oakland.mi.us/drain/program_service/env_hotline.html) through various means such as newspapers, posters, mailings, web sites, etc. Any complaints that it receives directly will be recorded and referred or investigated as appropriate. In conjunction with IDEP and construction programs, the City will be developing an improved complaint tracking and response system for the reporting of illicit discharge complaints. They will investigate the use of a computer database system. The City staff will be trained to recognize and respond to illicit discharges and will develop a strategy for informing the public about the impact that illicit discharges have on the water resources. The City will utilize or modify existing educational information on the reporting of improper disposal from sources such as the HRWC, RPO, MSU-Ext, MDEQ, RRRASOC and the EPA. They will publicize information on illicit connections and the reporting system in the City newsletter, website, City Hall information shelf, newspaper articles, cable TV spots, flyers and posters.

Responsibility: City Administration

Measure: Tracking records. Copies of publications. Number of complaints received and their resolution.

Schedule: Develop, publicize, and utilize within 2 years of COC issuance.

Possible Additional Activities/Education Topics:

- How storm and sanitary sewers work and how they are connected to water bodies
- Definition of “illicit discharge” and “illicit connection”
- What can and can not be discharged to storm sewers
- How to recognize an illicit discharge and the impact it may have on the water body

Existing Effort: The City has an informal system of receiving complaints. Complaints are received by the various departments through telephone, walk-ins, email and in-field contacts. The complaints are forwarded to the appropriate department for follow-up.

2. *Educate the public on the availability, location, and requirements of facilities for the collection and/or disposal of household hazardous waste, travel trailer sanitary wastes, chemicals, grass clippings, leaf litter, animal wastes, and motor vehicle fluids.*

Task II-2.1: Provide the public with information on the disposal of household hazardous, travel trailer, yard, and motor vehicle wastes.

Target Audience: General public

Messages: Disposal and/or reuse of these wastes.

Description: The City will work with the HRWC, MSU-Ext, RPO, MDEQ, USEPA, RRRASOC or other existing environmental educational organizations in developing/modifying informational materials that cover the proper storage, handling and disposal of hazardous household wastes, etc. It will identify

information gaps on disposal (e.g. recreational vehicle waste, battery disposal) and investigate opportunities to provide this information. The information will be published in the City newsletter and available on the website and information shelf. Information may be sent in some type of mass mailing.

Responsibility: City Administration
Measure: Copies of publications/flyers and number distributed.
Schedule: Begin publication in 2nd year after COC issuance and periodic thereafter.

Possible Additional Activities/Education Topics:

- What are household hazardous wastes and where can they be taken for disposal
- Non-toxic alternatives to hazardous materials
- Appropriate disposal of sanitary wastes from recreational vehicles and water craft
- River-friendly landscaping
- Disposal of waste fluids from motor vehicles

Existing Efforts: The City did sponsor a household recycling drop off program; however, the site was discontinued due to the large volume of unauthorized dumping that occurred at the site and the court system throwing out any tickets issued in an attempt to stop unauthorized dumping. The City now encourages residents to utilize other sites provided by RRRASOC that are located in Wixom, Walled Lake, Farmington, Farmington Hills, Southfield, Lyon Township and Novi. The City will continue this effort by announcing the date and locations of collection in the City newsletter and website. The City has been a member of RRRASOC since the early 1990's.

RRRASOC provides information regarding household hazardous waste disposal, and data for the amount of hazardous waste generated by the residents of South Lyon. They provide the City with pamphlets regarding proper waste disposal, composting, the newsletter "The Recycling Authority", and will provide on-site presentations for responsible waste management. Off-site presentations can also be arranged for groups of various ages and settings.

The City provides leaf pick-up in the Fall and brush pick-up year round. Great Lakes Waste Services is the contractor for trash, yard waste and recyclables. Yard wastes are separated from general refuse, as are the recyclables.

3. *Public education concerning application and disposal of pesticides, herbicides, and fertilizers.*

Task II-3.1: Provide the public with information on the disposal of yard chemicals.

Target Audience: General public and City maintenance staff

Messages: Proper use, storage, and disposal of yard chemicals.

Description: The City will work with the HRWC, MSU-Ext, RPO, RRRASOC, Department of Agriculture, MDEQ, EPA or other existing environmental educational organizations in developing/modifying informational materials that cover the proper use, storage, and disposal of yard chemicals and that provide suggestions for alternatives. The City will make Oakland County MSU-Extension fact sheets on fertilizer and pesticide application available to both the general public and lawn care businesses in the area. The MSU-Extension horticulture hotline number will also be publicized. The City will use its newsletter, website, information shelf, and mailings to broadcast information.

Responsibility: City Administration
Measure: Copies of the information/publications and number distributed.
Schedule: Begin publication in 3rd year from COC issuance and periodic thereafter.

Possible Additional Activities/Education Topics:

- How to reduce usage of standard yard chemicals
- Alternatives to standard yard chemicals
- How yard chemicals reach water bodies and how they impact those water bodies

4. *Public education concerning preferred cleaning materials and procedures for non-commercial car washing.*

Task II-4.1: Provide the public with information on community fund raising or ‘school’ car washes.

Target Audience: General public, City maintenance staff and local schools.

Messages: Alternative materials and methods for residential/fund raising car washing.

Description: Promote watershed-friendly car care by obtaining and distributing information and educational materials from the RPO and other organizations. Encourage residents to utilize professional car wash facilities that are discharging waste water to the sanitary sewer. Promotion will be through the City newsletter, website, information shelf, and mailings such as billings.

Responsibility: City Administration

Measure: Copies of information and number distributed.

Schedule: Begin in 3rd year and periodically thereafter.

Possible Additional Activities/Education Topics:

- Impact of car washing on water bodies

5. *Public education concerning the ultimate discharge point and potential impacts of pollutants from the storm water drainage system serving their places of residence.*

Task II-5.1: Storm sewer awareness training for the residents, business owners, and the public.

Target Audience: Residents, business owners, and the public.

Messages: General awareness of storm sewer systems in South Lyon and how they impact the watershed.

Description: Workshop for residents. Explain how the different types of sewers work and where they discharge. Review the City storm sewer system and location of storm sewer catch basins. Explain the watershed concept and give an overview of the Huron River Watershed. Discuss what each person can do to improve the watershed.

Responsibility: City Administration

Measure: Copy of training materials and attendance sheet.

Schedule: Begin and complete in 3rd year from COC issuance.

Task II-5.2: Publish Newspaper/Newsletter Articles

Target Audience: All residents

Messages: Storm water management. “What you can do to help the watershed.”

Description: ¼ to ½ page article with clip art targeting “The Huron River and its Local Tributaries” with different actions emphasized in each article. The City will work with MSU-Ext, RPO, Department of Agriculture, MDEQ, USEPA or other existing environmental educational organizations in developing/modifying informational materials that cover drainage systems. The City will investigate showing existing videos from the HRWC and RPO on the local cable station. The City will investigate the creation of diagrams and maps to be displayed within the City and the use of tax and sewer bill stuffers to convey the message.

Responsibility: Department of Public Works

Measure: Copies of materials distributed.

Schedule: Begin in 3rd year and periodic thereafter.

Possible Additional Activities/Education Topics:

- Maps of the drainage system in the area
- Information on how storm and sanitary sewers work and where they discharge
- Information on the impacts of storm water pollutants on water bodies

6. *Public education for citizen responsibility and stewardship.*

Task II-6.1: **Form a focus group of interested groups and citizens within the City to advise and assist the City in designing and implementing public education and storm water management (See Task III-2.1).**

Target Audience: Business, industry, agencies, non-profits, schools, churches and citizens-at-large.

Messages: Community buy-in and action.

Description: A group of about 12 people will be formed to discuss the objectives of the City’s SWMP and provide input and feedback on the education program. The group will provide avenues by which the education program can reach the spectrum of interested parties.

Responsibility: City Administration

Measure: Successful formation of group. Copies of meeting minutes and attendance sheets.

Schedule: Complete in 1st year.

Task II-6.2: **Workshop on “Low-Impact Development”.**

Target Audience: Developers, trades-people, and City staff.

Messages: Low-impact development.

Description: Sponsor or co-sponsor with other communities or groups a “Low-Impact Development” Workshop utilizing existing information and materials. The City will investigate working with the HRWC on developing/modifying educational materials on the subject. The City plans to utilize its website and newsletter to disseminate information about low-impact development and the Huron River.

Responsibility: Building Department

Measure: Video of workshop and attendance list. Observed changes in development.

Schedule: Develop in the 4th year and hold the workshop in the 5th year.

Possible Additional Activities/Education Topics:

- Information on the Huron River Watershed
- Information on the impact of the City on the watershed
- Watershed-friendly home/yard maintenance
- Information on watershed groups and activities

7. *Public education concerning management of riparian lands to protect water quality.*

Task II-7.1: Provide flyers/information on watershed-friendly land management and research the feasibility of related workshop(s).

Target Audience: Riparian owners and residents.

Messages: Watershed-friendly land management for riparian owners.

Description: The City will work with HRWC, MSU-Ext, RPO, Department of Agriculture, MDEQ, USEPA, RRRASOC or other existing environmental educational organizations in developing/modifying informational materials that promote watershed-friendly land management. The City will investigate partnering with other communities and groups to put on workshops on responsible riparian land management for the range of target audiences.

Responsibility: City Administration

Measure: Copies of flyers and number distributed. Workshop feasibility report.

Schedule: Begin and complete in 5th year.

Possible Additional Activities/Education Topics:

- The impact of land use on water bodies
- Watershed-friendly landscaping

The tasks, measures, and implementation schedule of the PEP are summarized in Table 8-1 (Section VIII).

Section III - Public Involvement and Participation Plan

3.1 Public Involvement and Participation Plan (PIPP) Objectives

The purpose of the PIPP is to involve the City residents, community officials, local business representatives and other interested parties in the development and implementation of the storm water management program.

The general objectives of the PIPP are to:

1. Meet the required elements of a PIPP as outlined in the permit.
2. Involve a cross-section of the citizenry of the City in the decision-making, review and implementation of the SWMP.
3. Utilize the resources of the public, local businesses and existing community groups in the implementation of the management plan.
4. Engage local environmental groups and seek their input and support on the SWMP. In turn, encourage students, organizations, and individuals in the community to participate in existing environmental groups and programs.

The population of the City is ethnically, economically, socially, and culturally homogeneous. As such, there is no need to make special efforts to ensure the participation of various ethnic or socioeconomic groups. The City will, however, make every effort to involve all age groups and local interest groups and to get input from as diverse a cross-section of the population as possible. The City will seek out and draw on people from existing community organizations and groups to assist them in their storm water management efforts. The organizations that may be contacted include local church groups, local sporting and environmental groups including the HRWC, the Board of Education, Citizens Helping Educators Encourage Responsible Students (CHEERS), City Council, Downtown Development Authority, Parks and Recreation Commission, the Wellhead Protection Program citizen advisory group, the Chamber of Commerce, the Recreation Council, the Center for Active Adults, the District Library, the Lions Club, Kiwanis and other business and civic organizations. The City plans to utilize their existing avenues to publicize the management program and seek participation and input. Those existing avenues are tabulated below.

Type	Size	Frequency	Delivery	Comments
City Newsletter	4-6 pages	2-3 times/year	Mailed to all residents	
Utility Bills	Postcard	4/year	Mailed to homeowners	Water Bills
Wellhead Protection Committee		Quarterly		
Cable TV		Emergency		After system upgrade
City Website		Continuous updating	All internet	www.southlyonmi.org
South Lyon Herald		Weekly Publication	Mail, purchase	
Information Shelf (City Hall)		Continuous updating	Pickup	
Informational flyer		As needed	Mailed to all residents	
Notice Board		As needed		
City Council		Meets Twice/month		
Surveys			Mailed to random % of residents	

3.2 Planned Efforts

The following paragraphs summarize the three (3) required elements of a PIPP as specified in the MDEQ General Storm Water Permit (MIS040000) and the City's plan for addressing each. The City is committed to implementing activities in all three of the required elements within five years of COC issuance. Potential future efforts are listed under each element, as well. The information and actions encouraged by the PIPP will be consistent with the regulations and plan objectives. A summary of the implementation schedule and the tasks and measures for the PIPP are given in Table 8-2 (Section VIII).

1. *Follow local public notice requirements, as appropriate, when notifying the public that the City must implement a storm water management plan. Make copies of draft and final management plans available to the public for comment and inform them as to when and where copies are available.*

Task III-1.1: Provide copies of the draft and the final SWMP to the public and interested groups.

Target Audience: The citizens of South Lyon, City employees, and local businesses.

Description: The target audience will be advised of the significance of the SWMP and informed as to when and where they can obtain copies of the final SWMP and provide comment by the following means:

- 1) An article will be placed in the City newsletter, the South Lyon Herald, the Ann Arbor News and on the City web site that covers the highlights and tasks of the SWMP, gives the City's web address and other locations where copies can be obtained and asks for public comment;
- 2) A link to the SWMP will be placed on the website and a means of making comments via e-mail will be provided;

- 3) If possible, a notice will be included on the utility bills (4 times in Year 1) that will tell recipients about the SWMP and where to obtain copies;
- 4) A spot will be placed on the local cable TV channel that tells viewers about the SWMP and where to obtain copies;
- 5) An informational flyer will be passed out to all the local businesses;
- 6) The SWMP will be discussed at a City Council meeting and copies will be provided to the council members; and
- 7) Copies of the SWMP will be placed on the Information Shelf at City Hall, and in the local library.

Responsibility: City Administration
Measure: Completion of all sub-tasks and copies of all documents. The number of copies distributed, comments received, and hits on the web site.
Schedule: Complete within 1 year of COC issuance.

Task III-1.2: **Hold an informational meeting to discuss the draft SWMP and seek input.**

Target Audience: City administrators, DPW staff, other field staff, and the public.
Description: A public meeting will be held where an overview of the SWMP and its significance to the community will be discussed. The meeting will be announced through flyers and personal contact. PowerPoint and handouts maybe used and copies of the SWMP will be provided. Comments will be solicited.

Responsibility: City Administration
Measure: Copies of the announcement, meeting minutes and comments received.
Schedule: Complete within 1 year of COC issuance.

Possible Future Efforts:

- Meeting/workshop(s) on the final SWMP for any and all interested parties
- Follow-up (Quarterly) publications and notifications (newsletter, newspapers, etc.) telling of SWMP progress and success and soliciting volunteers for future activities
- Discussion of the SWMP at the meetings of other community groups, such as the Wellhead Protection Committee, and initiate cooperation and coordination between the groups

2. *Establish and implement a citizen advisory committee for the purpose of encouraging public involvement in all aspects of the storm water management program.*

Task III-2.1: **Form a SWMP citizen’s advisory committee of about 12 members to provide input on the specifics of the plan, provide resources for the implementation of the program, and assist in the public involvement and education efforts (See Task II-6.1).**

Target Audience: Members will represent a cross-section of the citizens and businesses in the City so all view points will be heard.

Description: An advisory group of about 12 members will be formed to guide and assist the City in the development and implementation of the SWMP. The group will meet regularly (at least quarterly) during the start-up of the program. Contacts will be made with local church groups, local sporting and environmental groups including the Huron River Watershed Council, the Board of Education, CHEERS, City Council, Downtown Development

Authority, Parks and Recreation Commission, the Wellhead Protection Program citizen advisory group, the Chamber of Commerce, the Recreation Council, the Center for Active Adults, the District Library, the Lions Club, Kiwanis, other business and citizen organizations and student organizations to recruit members. Members of the public at large will be recruited through notifications on the web page and newsletter.

Responsibility: City Administration
Measure: Meeting minutes and attendance records.
Schedule: Complete within 1 year of COC issuance.

Task III-2.2: **Develop and distribute a survey form to the citizens of South Lyon to determine their awareness and opinion of storm water and watershed issues.**

Target Audience: General public and students.

Description: A questionnaire/survey will be developed that will provide insight into:
1) the extent of the public awareness of storm water and watershed issues and their ideas on possible water quality improvements;
2) what they know about the SWMP and their opinions on the effort;
3) what they know about the water bodies in the community.
The survey content and format will be reviewed and approved by the Advisory Committee. Responses to the survey will be tabulated and the committee will use the data to help them in their oversight of the program.

Responsibility: City Administration
Measure: Copy of the survey distributed the number and type of responses, a summary of the responses and documentation of use by the committee.
Schedule: Complete in the 2nd year.

Possible Future Efforts:

- Periodic surveys of the public to determine the effectiveness of public involvement/education; determine if their awareness has grown and opinion improved
- Public meetings with the Citizens Advisory Committee as lead to provide the committee with insight as to the public concerns
- Partner with the schools to form an advisory group or club for students to involve them in local environmental issues

3. *Pursue cooperation with local stream or watershed protection organizations by informing them of the City's program, providing them with copies of draft and final plans and seeking their input on the plans and program. Solicit volunteer assistance from the groups in the implementation of the program and associated activities. Satisfy permit requirements where possible by assisting the organizations with their efforts.*

Task III-3.1: **Develop a mailing and contact list for local stream and watershed protection organizations and local sporting and environmental groups.**

Target Audience: Local stream and watershed protection groups and local sportsman and environmental groups.

Description: Develop a contact list for these organizations so they can be contacted about the SWMP. The list will be developed from the phone book, the internet and personal contacts.

Responsibility: City Administration

- Measure:** Copy of the list.
Schedule: Complete in the 1st year.
- Task III-3.2: Provide the target groups with draft copies of the SWMP using the mailing list and solicit comment on the plan.**
- Target Audience:** Local stream and watershed protection groups and local sporting and environmental groups.
- Description:** E-mail the groups copies of the draft and final approved plans and give them the City website address so they can review updates and print out additional copies. The e-mail will ask for their comments on the draft plan and will provide them an e-mail address to which to send comment. Comment can also be received via the storm water link on the City's website.
- Responsibility:** City Administration
- Measure:** Documentation of mailing. Number of comments received and volunteers recruited.
- Schedule:** Complete in 1st year.
- Task III-3.3: Contact the target groups to determine what programs they sponsor that may satisfy SWMP or permit requirements. Evaluate those qualifying programs to determine those in which the City will participate or encourage participation.**
- Target Audience:** Local stream and watershed protection groups and local sportsman and environmental groups.
- Description:** Personal contacts or mailings to determine what programs exist that the City or its citizens may participate in to satisfy requirements of the SWMP and the permit. Evaluate those programs, and if appropriate, solicit volunteers for participation.
- Responsibility:** City Administration
- Measure:** Number of programs evaluated. Number of programs in which the City or citizens participated.
- Schedule:** Complete in the 2nd year.
- Task III-3.4: Investigate the formation of a volunteer water quality monitoring program in cooperation with the Huron River Watershed Council (HRWC) or other similar group to collect and report data on the major water bodies in the area.**
- Target Audience:** Citizens, City staff, and school students.
- Description:** The City will investigate working with the School District, the HRWC or a similar group to implement a long term water quality monitoring program of the major water bodies in the area. Data may be collected on an annual basis and tabulated, interpreted and reported as part of the SWMP annual report. This program would be designed to satisfy Part I. Sections C.1.b. and d. of the permit.
- Responsibility:** City Administration
- Measure:** Documentation of feasibility investigation. Data reported. Documentation of long-term water quality improvement.
- Schedule:** Begin the investigation in the 4th year and, if feasible, begin the program in the 5th year.

Possible Future Efforts:

- Join the HRWC
- Co-sponsor a stream clean-up with one of the groups
- Co-sponsor a wetland planting or native landscape planting project on City property with one of the groups as an example/showcase for citizens and to be used in nature studies
- Actively participate in a watershed protection group such as the Upper Huron or Huron River Chain of Lakes subwatershed groups
- Co-sponsor a storm drain stenciling program with one of the groups to add to the awareness of citizens/students on local storm water drainage and to prevent locals and visitors from dumping in storm drains

A summary of the tasks, measures, and the implementation schedule for the PIPP are shown in Table 8-2 (Section VIII).

Section IV - Illicit Discharge Elimination Plan

4.1 Illicit Connection and Discharge Elimination Plan (IDEP) Objectives

The purpose of the IDEP is to develop a program to prohibit and effectively eliminate illicit discharges to the storm sewer system. The federal law defines “illicit discharge” and “illicit connection” as follows:

Illicit discharge - the discharge of untreated sanitary wastewater (including industrial and commercial wastewater) or other polluting materials into a river, stream or other water body from: improper sewage connections - such as sources of sanitary sewage which should be connected to the sanitary sewer but are inappropriately connected to the storm sewer; effluent from improperly designed and/or operated septic systems; sanitary sewer overflows; improper disposal of waste products – such as emptying a mobile home holding tank into a catch basin or pouring used motor oil into a catch basin; Other discharges not composed entirely of storm water (except as specified in the permit).

Illicit connection – an improper physical connection of illicit discharges to the storm water drainage system, or other connections not authorized by the local authority (where required), to the storm water drainage system. Examples of illicit connections are: a) a floor drain in an automobile repair shop that is connected to the storm sewer rather than the sanitary sewer; and b) a septic tank discharge line that has been connected to the storm sewer. An improper connection of a source of storm water to the sanitary sewer would also be considered an illicit connection, for example, a parking lot catch basin that is tapped into the sanitary sewer. Illicit connections refer to a physical connection to the drainage system that either: primarily conveys illicit discharges into the storm sewer system, or is not authorized or permitted by the local authority, if required.

For the purposes of this plan, “outfall” is defined as: the point at which a storm water conveyance under the jurisdiction of one entity discharges into a natural waterbody, wetland, upland, or into a conveyance or property under the jurisdiction of another entity. During visual observations or sampling, in instances where the storm water outfall is submerged or the outfall is connected to another enclosed sewer, the City will inspect the nearest upstream manhole or access point.

4.2 City of South Lyon Storm Sewer System

The City of South Lyon covers approximately 3.7 square miles. It has separate sanitary and storm sewers under its jurisdiction and less than 1.0% of the City’s residences are being served by OSDS. The separate storm sewer system in the City of South Lyon consists of storm sewers under the ownership and/or jurisdiction of several different entities, namely, the RCOC, the OCDC, private entities, the City of South Lyon, and the South Lyon Community School District. For example, approximately 2.66 miles of primary roads and 0.99 miles of secondary roads in the City, and their associated right-of-way drainage systems, are under the jurisdiction of the RCOC (data from RCOC).

The City of South Lyon’s separate storm sewer system and the locations of known storm sewer outfalls are shown in Figure B-2 (Appendix B). Table B-1 (Appendix B) lists the known storm sewer

outfalls, their locations, their sizes, the type of area they serve (i.e. residential, commercial, etc.) and their ownership. The information presented in Appendix B is based on the City’s records of as-built sewer storm system maps. This information will be verified as the illicit discharge elimination program is implemented. There are five (5) Oakland County drains within the City of South Lyon. The drains are the Lyon No. 1 Drain, South Lyon Drain No. 1, Yerkes Drain, Sayre Drain and the Underhill Drain. Maps of the drains and other water bodies are shown in Figure A-1 (Appendix A). The City currently knows of approximately 65 outfalls under their jurisdiction. They discharge to various receiving sites including the OCDC drains, land owned by the City of South Lyon, the South Lyon Community School District and other privately owned property within the City of South Lyon. All storm water from the City ultimately drains to the Huron River.

4.3 Planned Efforts

The following subsections summarize the three (3) required elements of an IDEP as specified in the MDEQ Jurisdictional General Storm Water Permit and the City’s plans for addressing each element. The City is committed to beginning the IDEP within 90 days of final submittal of the SWMP and to completing activities in each of the three required elements within 5 years of COC issuance. The actions completed will comply with the regulations and plan objectives and are summarized in Table 8-3 (Section VIII).

1. *Develop adequate legal authority and enforcement capability to implement its illicit connection and discharge elimination program within its jurisdiction.*

Task IV-1.1: Review existing City ordinances.

Description: The City of South Lyon must have adequate legal authority and enforcement capability to implement its IDEP. The City will conduct a thorough review of its existing ordinance to determine if:

- The ordinance adequately defines illicit connections and discharges;
- The ordinance prohibits illicit connections and discharges;
- The City has adequate legal authority to investigate suspected illicit connections and discharges;
- The City has adequate legal authority to require elimination of illicit connections and discharges;
- The City has adequate enforcement capability.

Responsibility: City Administration
Measure: Documentation of review.
Schedule: Review complete in 2nd year.

Task IV-1.2: Amend and adopt City ordinance as needed.

Description: If needed, the ordinance will be modified to ensure that the City has the legal authority to implement the IDEP. Model ordinances will be utilized to provide wording for any amendments that may be necessary to give the City adequate legal authority and enforcement capability.

Responsibility: City Administration
Measure: Documentation of adoption of amendments.
Schedule: Adoption complete in 3rd year.

2. *Prepare a drainage system map showing all known City-operated outfalls.*

Task IV-2.1: Update the City storm sewer maps into GIS format.
Description: The City will update their storm sewer maps from CADD format into GIS format. The City will utilize the updated GIS maps and their associated outfall coordinates during storm sewer observations and sampling.
Responsibility: City Administration
Measure: Documentation of evaluation and decision.
Schedule: Complete in 1st year.

Task IV-2.2: Field verify storm sewer outfalls.
Description: The City will complete a field verification of the storm conveyance outfalls within the City based on the existing maps. This may be completed during the initial dry weather inspection or as a separate field reconnaissance.
Responsibility: City Administration
Measure: Outfall map and table updated.
Schedule: Begin in 2nd year and complete in 4th year.

Task IV-2.3: Develop procedures to identify and record outfalls from new construction.
Description: The City will develop and implement a procedure to add outfalls from new construction. The procedure will involve identifying new outfalls and receiving waters through the building permit process, adding them to the existing storm sewer catchment system map, and performing an initial dry weather inspection of the outfall.
Responsibility: City Administration
Measure: Procedure documented and implemented. New outfalls mapped and inspected.
Schedule: Complete in 3rd year.

3. *Develop and implement a program to find and eliminate illicit connections and discharges.*

Task IV-3.1: Perform visual inspections and dry weather screenings of all City operated storm sewer outfalls.
Description: A visual inspection will be conducted at each of the City-operated outfalls within the City, as shown in Figure B-2, during dry weather. In instances where the storm water outfall is submerged, or the outfall is connected to another enclosed sewer, the City will visually inspect the nearest upstream manhole.
Dry weather discharges are sometimes indicative of illicit connections. Dry weather inspections will be conducted if no rain/precipitation event has occurred for a minimum of 48 hours. If flow is observed in the sewer at that time, it may be attributed to sewage, cooling water, sump pump discharge, infiltration from ground water sources, or runoff from potable water sources such as lawn sprinklers.
The City may be able to locate the source of an illicit connection/discharge solely through visual observation of flow in the storm sewer at manholes. Odor, color, turbidity, bacteria growth, quantity of flow, etc., may lead to the source of a problem without additional sampling.

All storm outfalls that are discharging during dry weather will be investigated further by upstream visual inspection or with televising, as-built pipe schematic review, dye and/or smoke testing, sampling, or other investigation as needed to determine the nature and source of the flow.

1. Televising - The City may elect to televise those storm sewers that have suspicious flows to identify pollutant sources that cannot be located through simple visual observation and/or sampling. For example, the City may determine through visual observation and/or sampling that an illicit connection exists between two specific manholes. Video inspection of the stretch of storm sewer between these two manholes could be used to isolate the exact source of the connection/discharge.
2. As-built pipe schematic review - Where available, the City will utilize as-built pipe schematic drawings as a tool to determine the source of an illicit connection/discharge.
3. Dye or smoke testing - The City will conduct physical inspection of commercial and/or residential facilities as needed to verify suspected illicit connections that are detected through visual observations/sampling of yards, outfalls and manholes. As necessary, facility inspections will include dye or smoke testing of suspect facility plumbing fixtures to determine if the fixture discharges to the sanitary sewer or to the storm sewer. All facility inspections will be documented.
4. Sampling - Investigation of dry weather discharges will be prioritized based on the number of discharges identified as well as other factors including location, volume of flow, and suspected contaminants based on color, turbidity, or odor. If flow is observed during the dry weather outfall inspections and visual observations do not lead to a source, the City may decide to sample the flow for pollutant parameters typically found in illicit connections. Sampling can rule out some dry weather discharges such as groundwater. The sampling will typically begin at the outfall and continue upstream from manhole to manhole until a source is found. The choice of sampling parameters will depend on several factors including:
 - Location of the storm outfall (i.e., in residential or commercial area);
 - Turbidity and color of discharge which could distinguish between an illicit discharge from a commercial establishment versus a residence;
 - Odor associated with discharge such as petroleum odor, or raw sewage odor.

The City may choose to analyze the samples for some or all of the following parameters:

Parameters	Found In	Potential Source(s)
<i>Escherichia coli</i>	Sewage	Human or Animal Waste
Surfactants	Soap, Emulsifiers	Industrial/Commercial/ Residential
Ammonia	Sewage, Fertilizers, Industrial Chemicals	Industrial/Residential/ Agricultural
Nitrates	Sewage, Fertilizers, Industrial Chemicals	Fertilizers/ Industrial/ Residential/Agricultural
Nitrites	Sewage, Fertilizers, Industrial Chemicals	Fertilizers/ Industrial/ Residential/Agricultural
Conductivity	Industrial Waste, Sewage, Salt	Industrial/ Residential/ Agricultural
Total Dissolved Solids	Industrial Waste, Sewage, Salt	Industrial/Residential/ Agricultural
Temperature	Cooling Water, Sewage	Industrial/ Residential
pH	Acids and Bases	Industrial/ Residential

The City may elect to conduct wet weather observations of some outfalls to determine if runoff from certain areas is contaminated. For instance, oil sheen at the outfall may indicate illicit disposal of oils or grease upstream in the service area. All outfall inspections will be documented.

Responsibility:

Measure:

Schedule:

City Administration

Documentation of findings. Number of illicit discovered.

Begin in 2nd year, complete in 4th year and repeat visual inspections every 5 years.

Task IV-3.2:

Description:

Trace Illicits and Owner Notification.

Trace illicits to their source and notify the owner in writing and direct them to eliminate the illicit connection/discharge within a specified timeframe. The notification will require the owner to inform the City when the connection has been eliminated. The timeframe for eliminating the connection/discharge will depend on the type of illicit connection/discharge, expense, and difficulty in repair. The goal of the plan is to have most illicit connections/discharges eliminated within 60 days of notification. Illicit connections/discharges that are more complex may take longer than 60 days to eliminate.

Responsibility:

Measure:

Schedule:

City Administration

Number of illicits traced and documentation of notification and elimination.

Begin in 2nd year and continue until all illicits traced.

Task IV-3.3: Follow-up Enforcement for Non-correction
Description: The City will follow up with the owner to ensure that the connection/discharge has been eliminated. If the illicit has not been eliminated, the City will enforce its ordinances to obtain compliance.
Responsibility: City Administration
Measure: Documentation of enforcement actions. Number of illicit found vs. number eliminated.
Schedule: Begin in 4th year after ordinance is modified and continue as needed.

4. *Develop and implement a program to minimize seepage from sanitary sewers and on-site sewage disposal systems (OSDS) into the separate storm water drainage system.*

Task IV-4.1: Identify and record all OSDS within the City.
Description: The City will locate and record all OSDS within the City limits. Less than 1.0% of the City of South Lyon’s population is served by OSDS. There is only one small area within the City limits that is known to be using OSDS. The area is located on Hagadorn Court. A review of the City’s records to determine individuals that are not being billed for sewer services may locate additional OSDS. Citizen complaints and observations by City employees can also assist in locating these areas of concern and OSDS failures are expected to be identified as part of the outfall/sewer observations and sampling.
Responsibility: City Administration
Measure: A list/map of the locations of all OSDS.
Schedule: Complete in 1st year.

Task IV-4.2: Enforcement of Existing and Revised City Ordinance.
Description: Currently, the City identifies failing OSDS through complaints from residents and/or observations made by City field personnel. When failing OSDS are identified, the City notifies the Oakland County Department of Health (OCDH). A review of the City’s ordinance indicates that Section 94 of the City Code requires connection to the sanitary sewer system where the OSDS is determined to be failing if the service is available. Any OSDS found to be failing will be sent a notice to connect to the sanitary sewer, if it is available, in accordance with City Code. If the ordinance is revised, it will be enforced accordingly.
Responsibility: City Administration
Measure: Number of notice letters sent and failed OSDS connected to the sewer.
Schedule: Begin in 1st year and ongoing.

Task IV-4.3: Review OCDH Program and Ordinance.
Description: The City will review the OCDH program and evaluate for compliance with Phase II. The City of South Lyon recognizes the authority and expertise of the OCDH in overseeing issues related to failing septic systems. Currently, all new construction and repairs for OSDS are permitted through the OCDH. Oakland County is currently pursuing a county-wide OSDS inspection ordinance. If a county-wide ordinance is not enacted, the City will consider developing its own ordinance.
Responsibility: City Administration

Measure: Documentation of review of OCDH program. The adoption of a local ordinance, if needed.
Schedule: Begin review in 2nd year and complete ordinance adoption in 3rd year if needed.

Task IV-4.4: OSDS Complaint Tracking, Response, and Investigation (See Task II-1.2).

Description: Citizens and business owners are often an excellent source of information regarding illicit connections and discharges. The City currently has a complaint response system in place that forwards complaints to the OCDH. However, improvements to the system can be made. The City will establish a reliable system to receive and investigate citizen reports regarding suspicious discharges from storm sewer outfalls, failed OSDS, waste dumping, construction sites, etc. The reporting system will include:

- Telephone complaint system with emergency number for non-business hours;
- Complaint documentation and tracking system;
- Follow-up notification to reporting citizen to inform them what corrective actions have been or are being taken.

When the City of South Lyon receives complaints regarding illicit discharges, the City will investigate each suspected connection as outlined above and take appropriate action(s).

Responsibility: City Administration

Measure: Documentation of complaint receipt, response and follow-up to complaint

Schedule: Develop system in 2nd year with tracking and response ongoing thereafter

Task IV-4.5: Evaluate the integrity of the separate sanitary sewer system in the City.

Description: Evaluate the sanitary sewer system to ensure that seepage into the groundwater and surface water is minimized. The evaluation will include visual observation, flow, other record review, sewer televising, and other means as appropriate.

Responsibility: DPW

Measure: Report of evaluation and recommendations.

Schedule: Complete evaluation and report in the 5th year with periodic review.

5. Coordinate the implementation of IDEP efforts with other government agencies.

Task IV-5.1: Coordination with the OCDC and OCDH.

Description: The OCDC has developed its own illicit connection and discharge elimination program. OCDC will be inspecting and sampling its storm drain outfalls to surface waters. When County sampling and inspection results suggest that illicit connections to County storm drains exist, OCDC will investigate further to determine where the suspected illicit discharge is coming from. OCDC will notify the City of all illicit connections/discharges suspected to originate in the City of South Lyon. The City will investigate each suspected connection and take appropriate action(s) in accordance with the investigative techniques described earlier.

OCDC also maintains a 24-hour, 7-days-per-week Safety Dispatch complaint telephone “hot-line” (248-858-0931). OCDC will refer complaints to the

City of South Lyon as appropriate. The City will investigate all complaints received through the OCDC hot-line and take remedial actions as appropriate. The City will coordinate OSDS complaint response with the OCDH.

Responsibility: City Administration
Measure: Number of illicit referrals.
Schedule: 1st year and ongoing.

Task IV-5.2: Coordination with the MDEQ.

Description: The City will notify the MDEQ of illicit connections/discharges discovered and of corrective actions being taken to eliminate the connection/discharge in the annual report or immediately if appropriate. The reports will summarize the following:

- Illicit connections/discharges identified through citizen complaints, OCDC referral, inspections, sampling and/or sewer television and the corrective actions taken, including follow up inspections and sampling;
- Dry/wet weather storm water outfall inspections conducted;
- Storm sewers televised in the past year, if any, and the findings;
- Corrective actions taken as a result of storm sewer televising;
- The anticipated schedule for televising storm sewers in the upcoming year;
- Sanitary sewers televised in the past year, as well as the findings;
- Corrective actions taken as a result of sanitary sewer televising;
- The anticipated schedule for televising the sanitary sewers in the upcoming year;
- On-site sewage disposal systems found to be improperly functioning and the actions taken to correct the problems.

Responsibility: City Administration
Measure: Copy of the annual report.
Schedule: 1st year and ongoing.

The tasks, measures, and implementation schedule of the IDEP are summarized in Table 8-3 (Section VIII).

Section V - Post-Construction Storm Water Management Program

5.1 Post-Construction Storm Water Management Program (P-CMP) Objectives

The City of South Lyon will address storm water management issues for new development and redevelopment at various levels—from City mandates to specific controls for individual projects—by developing and implementing a comprehensive storm water master plan. The objectives of the P-CMP are to minimize the effects of urbanization by addressing storm water runoff from new development and redevelopment projects that disturb one acre or greater, including projects less than one acre that are part of a larger common plan of development, that discharge to the storm sewer system. The storm water master plan will be a comprehensive document which describes policies, standards, and requirements for preventing storm water impacts and protecting sensitive areas. The plan will detail methods of inspection, enforcement, and levels of responsibility for long-term maintenance.

5.2 Planned Efforts

The following subsections summarize the four (4) required elements of a P-CMP as specified in the MDEQ General Storm Water Permit and the City’s plan for addressing each requirement. The City is committed to the comprehensive management of storm water issues. The plans and actions implemented by the P-CMP will be consistent with the regulations and plan objectives. Table 8-4 in Section VIII is a summary of the tasks, measures, and the implementation schedule of the P-CMP.

1. Develop a storm water master plan for development, implementation, and enforcement of jurisdiction-wide controls to protect the designated uses of State receiving waters.

Task V-1.1: Prepare and adopt a storm water master plan

Description: Develop a comprehensive storm water master plan which emphasizes controlling impacts of storm water runoff from new construction and redevelopment sites. Adopt the plan as city-wide policy and use it to guide plan review, inspections, upgrades to infrastructure, and enforcement.

Responsibility: City administration

Measure: Documentation of adoption.

Schedule: Complete in 3rd year.

2. Develop the legal authority to address post-construction storm water runoff from new development or redevelopment to the extent allowable.

Task V-2.1: Adopt policies and ordinances or other regulatory mechanisms to require appropriate post-construction BMPs.

Description: The City will review existing regulatory mechanisms and adopt or revise policies, ordinances, and specifications that require new development or redevelopment to address urban runoff quantity and quality issues during project planning and implementation. The City will review and utilize

concepts in model Post-Construction Storm Water Management Ordinances when working on their revisions. The ordinance will require new development and redevelopment projects to:

- a. Minimize impervious surfaces
- b. Control pollutants by eliminating or reducing potential new sources
- c. Install post-construction controls, as appropriate to the site
- d. Promote Low-Impact Development approaches

Responsibility: City Administration

Measure: Updated ordinance and/or procedures to comply with the permit.

Schedule: Begin review in 3rd year and complete revisions in the 4th year.

Task V-2.2: Provide training for City field staff.

Description: The P-CMP will be assigned to the City's Department of Public Works and Engineering Department, as they issue the general permits for sites. The personnel needed to implement this program include plan review staff that are knowledgeable of the permitting process, and site inspectors that are trained in overseeing the implementation and maintenance of BMPs during and after construction. The following types of training are essential to the success of the post-construction program:

- Recommended Best Management Practices (BMPs);
- Training of staff responsible for plan reviews and permit issuance in the design and application of BMPs and post-construction controls;
- Training of inspection staff in the proper methods and installation techniques of BMPs and post-construction controls.

Responsibility: City Administration

Measure: Copy of the training program and employee attendance records.

Schedule: Begin in 2nd year and repeat periodically.

Task V-2.3 Prepare informational materials and conduct outreach for the development community.

Description: In conjunction with its PEP and Construction Site Runoff Control Program, the City will provide informational and educational materials to the construction/development community for both structural and non-structural BMPs. The materials will be in the form of brochures/handouts that will be provided to developers at the time of construction permit application. The informational brochures/handouts will cover subjects such as:

- Low-impact development/Landscaping for storm water control
- Minimization of impervious surfaces
- Maximization of infiltration
- On-site storm water detention
- On-going inspection and maintenance
- Site planning measures that avoid or reduce disturbance of sensitive areas and limit addition of impervious surfaces
- Pollution prevention/source control measures that reduce or eliminate potential future sources of pollutants
- Treatment control measures that treat polluted runoff from new development/redevelopment sites
- Capturing sediment
- Good housekeeping

In addition, the City will investigate the feasibility of providing or co-sponsoring a workshop for developers and contractors that will cover construction and post-construction site controls. The workshop may be conducted in partnership with other communities, groups, or agencies.

Responsibility:

City Administration

Measure:

Copies of the information and numbers distributed. Documented improvement in the use of post-construction controls.

Schedule:

Begin in the 4th year and complete in the 5th.

Task V-2.4:

Inspection Program.

Description:

From construction drawings submitted by the developer and site inspections, the City's engineering and building departments will determine the proper installation of post-construction controls and BMPs implemented on the project. The checklist will be developed to reflect the proper implementation of post-construction controls and BMPs.

Responsibility:

City Administration

Measure:

Inspection records.

Schedule:

Begin in 4th year and complete in the 5th.

Task V-2.5

Develop documentation and reporting procedures.

Description:

The City will develop forms for record keeping and reporting on this program. Information that will be reported will include progress made relative to the measurable goals. The City will document the appropriate BMPs used by the City and its measurable goals. The City will also set into place appropriate reporting mechanisms to assess the program at specified time intervals.

Responsibility:

City Administration

Measure:

Copy of the procedures.

Schedule:

Complete in the 3rd year.

Task V-2.6

Long-Term Maintenance and Operations Program.

Description:

A major problem with many new development and redevelopment runoff controls is the proper long-term maintenance and operations of post-construction controls. The problem has many facets:

- Post-construction runoff controls require proper maintenance and become less effective or fail when maintenance is inadequate;
- Projects are often built by one entity and then occupied/owned by another entity. Several ownership changes make it difficult to delegate maintenance procedures and responsibilities to subsequent owners;
- Occupants/owners may not wish to take on maintenance responsibilities or costs or may be ignorant of such responsibilities or costs.

To avoid these problems, the City will have mechanisms in place to ensure that the controls are properly maintained. At the time of the permit issuance, the City will require the applicant to provide a clear explanation of who is to maintain the controls, the frequency at which the maintenance is to be conducted, and who is liable if maintenance is not completed.

Some of the avenues the City may use to ensure that controls are maintained include:

- For single-family residential developments where homes or lots are sold by the developer to individuals, and maintenance functions cannot be assigned to any one entity, the City will consider taking upon itself the maintenance of post-construction runoff controls. The City would then charge the property owners for the service provided through a user fee or an assessment;
- For projects involving multi-family residential units, the maintenance of the controls can be ensured through covenants, conditions, and restrictions adopted for the development. The City will inform the developer that this requirement must be conveyed to the Homeowners Association/property owner when the project is handed over;
- For commercial/industrial developments, the maintenance aspects can be ensured through conditions in lease agreements. The City will inform the developer that the lease agreements must note the maintenance requirements for post-construction runoff controls at the site.
- For public projects, maintenance of post-construction controls will be ensured by: (1) establishing a maintenance and monitoring plan for each City project, (2) assigning the task to the department responsible for the general maintenance of the site, and (3) providing adequate funding.

Responsibility: City Administration
Measure: A copy of the program.
Schedule: Begin in the 4th year and complete in the 5th.

3. Review and revise plan review procedures and requirements.

TaskV-3.1: Revise plan review procedures for new development or redevelopment to ensure the appropriate installation of BMPs, minimize illicit discharges, and ensure adequate long-term maintenance.

Description: Prior to receiving a construction permit from the City for a new development or redevelopment project, the applicant or developer must secure and submit all required approvals and permits from State and County agencies (MDNR, MDEQ, MDOT, OCDC, RCOC) and others as required. This process provides the City the opportunity to review the project during the planning stage and to direct its design and development in regards to storm water runoff issues through the City’s engineering department.

The City may, at this stage, require a developer to have in place a particular structural and/or non-structural BMP(s) that would reduce the potential for discharge of pollutants into the storm sewer system and the appropriate long-term maintenance of such controls. Upon ordinance review, the City may choose to revise current procedures and specifications to the City’s Standard Engineering Specifications Manual or to adopt an ordinance that will allow for the proper implementation of post-construction controls and BMPs.

The City will also ensure that spills and illicit discharges are minimized by reviewing the location of drainage inlets in relation to pollutant sources for commercial sites.

Responsibility: City Administration
Measure: Documentation of review and a copy of the review procedure.
Schedule: Begin review in the 3rd year and complete revisions in 4th year.

4. Coordinate the implementation of P-CMP efforts with other government agencies.

Task V-4.1: Coordinate with other government agencies.

Description: The City will coordinate with OCDC regarding jurisdictional issues and ensure that the County will accept responsibility for long-term maintenance of their BMPs associated with County drains.

The City will review cases that are referred to them by the MDEQ. The City will update MDEQ on the status of the cases that were referred in addition to the routine annual and semi-annual progress reports.

Responsibility: City Administration

Measure: Documentation of coordination efforts.

Schedule: Begin in 2nd year and ongoing.

The tasks, measures, and implementation schedule of the P-CMP are summarized in Table 8-4 (Section VIII).

Section VI - Construction Site Storm Water Runoff Control Program

6.1 Construction Site Storm Water Runoff Control Program (CRCP) Objectives

Storm water runoff from construction sites is currently regulated by the OCDC and the MDEQ. OCDC reviews site plans, inspects sites, and enforces the Part 91 regulations within the City limits. The City wishes to continue this arrangement and will request documentation from the County stating that it will provide these services to the City in a manner that will comply with the MS4 Phase II requirements.

At this time, the City's CRCP will mainly involve ordinance and plan review policy revision, contractor and City staff training, and ensure that the above regulatory programs meet the MS4 Phase II Permit requirements. If neither of these programs proves to be adequate, the City will research additional regulatory mechanisms that will enable Phase II Permit compliance. This may include becoming a Municipal Enforcing Agency (MEA) for Part 91 of Public Act 451 in order to regulate construction site storm water runoff at the local level.

6.2 Planned Efforts

The following subsections summarize the required elements of a CRCP as specified in the MDEQ Jurisdictional General Storm Water Permit and the City's plans for addressing each element. The City is committed to ensuring that the activities of each of the required elements are properly implemented. The plans and actions completed by the CRCP will comply with the regulations and plan objectives. The implementation schedule, tasks, and measures for the CRCP are outlined in Table 8-5 (Section VIII).

- 1. Notify the appropriate regulatory agency if a construction activity results in the deposition of solids or illicit substances into the separate storm sewer drainage system.***

Task VI-1.1: Coordinate with OCDC.

Description: OCDC presently is the County Enforcing Agent (CEA) for the City under Part 91 of Public Act 451, as such it issues soil erosion and sedimentation control (SESC) permits, reviews site plans, inspects sites, and enforces the County ordinance within the corporate limits of the City.

The City inspects construction activities to ensure compliance with the local building and grading permits. Current City policy is to report SESC violations to the County that are observed during City inspection activities or as a result of citizen complaints. The City will work with OCDC to implement the City's new complaint tracking system and will refer complaints to the OCDC when appropriate.

Responsibility: City Administration

Measure: Documentation of referrals and other issues.

Schedule: Begin in 2nd year and ongoing.

Task VI-1.2:
Description:

Coordinate with MDEQ.

If the MDEQ is the enforcing agency for a particular site under Part 91, then the City will report SESC violations and citizen complaints to the appropriate MDEQ personnel. The contact information for the appropriate MDEQ staff in charge of the regional SESC Program will be updated as part of the City's complaint tracking system.

MDEQ currently regulates storm water discharge from construction activities greater than one (1) acre or which directly discharge to waters of the State (including separate storm sewers) under NPDES permits through a Permit-by-Rule. Although it is the responsibility of the permittee to notify MDEQ within 5 days of becoming aware of an NPDES permit violation, the City may also notify the appropriate MDEQ personnel of such a violation. The City will also review and follow-up on any cases referred to them by MDEQ and update MDEQ on the status of these cases during regular progress reports.

Responsibility:

City Administration

Measure:

Documentation of referrals and other issues.

Schedule:

Begin in 2nd year and ongoing.

2. *Develop and implement a procedure to receive complaints and other information submitted by the public regarding construction site storm water runoff.*

Task VI-2.1:

Complaint response and investigation (See Task II-1.2).

Description:

Citizens and business owners are often an excellent source of information regarding runoff from construction sites. The City currently does not have a formal complaint response system in place; however, the City does take calls from citizens concerning the conditions of construction sites. These calls are then further investigated by the City staff. The City will establish a reliable system to receive and investigate citizen reports regarding complaints of storm water runoff from construction activities, and the other concerns addressed by the six minimum measures. The reporting system will include a telephone complaint system and documentation tracking system.

When the City receives complaints regarding runoff from construction activities, the City will investigate each site and take appropriate action.

Responsibility:

City Administration

Measure:

Documentation of complaint receipt and response.

Schedule:

Develop system in 2nd year and ongoing tracking and response.

3. *Review preliminary construction site plans to ensure adequate soil erosion and sediment controls.*

Task VI-3.1:

Review the existing SESC Program administered by OCDC.

Description:

OCDC presently is the County Enforcing Agent (CEA) for the City under Part 91 of Public Act 451, as such it issues SESC permits, reviews site plans, inspects sites, and enforces the County ordinance within the corporate limits of the City.

The City wishes to continue this arrangement as long as the OCDC program meets the construction requirements of the general permit and the objectives of the SWMP. The City of South Lyon will obtain a letter of commitment

from the County stating that it intends to continue to provide this service to the City in a manner that will comply with the MS4 Phase II Permit.

Responsibility: City Administration
Measure: Documentation of review of the OCDC's SESC.
Schedule: Begin in 1st year and complete in 2nd year.

Task VI-3.2: Review and revise existing City ordinances as necessary to implement the CRCP.

Description: The City of South Lyon's CRCP consists predominantly of documenting that the County and State regulatory programs for construction activities meet the City's MS4 Phase II Permit requirements in order to avoid duplicate permitting. Storm water, grading, and other related ordinances will be reviewed to allow tracking of the CRCP and adequate plan review to meet the MS4 Phase II Permit requirements.

MDEQ currently regulates storm water discharge from NPDES permitted construction activities through its Permit-By-Rule. If the State's NPDES Program for construction sites does not meet the Federal requirements, then the City will consider becoming an MEA. The NPDES regulations for construction sites necessitate the permittee to comply with following:

- Requirements for construction site operators to implement appropriate SESC BMPs;
- Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste that may cause adverse impacts to water quality;
- Requirements for construction site operators to develop and implement storm water pollution prevention plans;
- Requirements to submit a site plan for review that incorporates consideration of potential water quality impacts and ensures that the site is adequately sized for the placement of appropriate SESC BMPs.

Responsibility: City Administration
Measure: Documentation of review of and changes to ordinance.
Schedule: Begin review in 2nd year and complete any changes in the 3rd year.

Task VI-3.3: Review and revise the City's plan review process.

Description: The City's site plan review process will be revised to ensure that construction site runoff issues are addressed. As the County Enforcing Agency, OCDC provides plan review for adequate construction site controls under Part 91. Although SESC plan review is the responsibility of the County, the City will review preliminary site plans on a case-by-case basis to ensure that SESC's are appropriate. The City may elect to review plans for adequate controls based on site location, size, proximity to waterways and sensitive areas, steep slopes, erosive soils, or randomly.

Responsibility: City Administration
Measure: Documentation of site plan reviews.
Schedule: Begin review in 2nd year and have review process implemented in 3rd year.

4. *Provide appropriate BMPs to address storm water runoff from construction areas and measurable goals for each BMP.*

Task VI-4.1: Provide appropriate BMPs.

Description: When the City reviews plans for adequate controls, they will reference appropriate BMPs from the OCDC *Erosion Control Manual* and the MDEQ *Guidebook of Best Management Practices for Michigan Watersheds*.

Responsibility: City Administration

Measure: Documentation that appropriate BMPs are provided.

Schedule: Begin development in 3rd year and complete in 5th year.

Task VI-4.2: Provide measurable goals for each BMP.

Description: The OCDC presently is the County Enforcing Agent (CEA) for the City and monitors and enforces SESC on construction sites within the City. The County will be responsible for submitting measurable goals for each BMP that they require under their program as part of their Phase II requirements. If the County does not adequately measure and track BMP goals, then the City will develop a plan for measuring BMP implementation and effectiveness. This may include:

- Tracking citizen complaints;
- Monitoring sediment accumulation in catch basin sumps, streets, basins, or drains;
- Modeling or implementing a study of BMP effectiveness;
- Tracking field observations of City inspectors;
- Surveying contractors, developers, storm water operators, or BMP suppliers of BMP effectiveness and ease of installation and maintenance.

Responsibility: City Administration

Measure: Documented performance of BMPs.

Schedule: Begin in 3rd year and complete in 5th year.

5. *Provide education materials and outreach.*

Task VI-5.1: Provide outreach and distribute educational materials to the construction community.

Description: In conjunction with its PEP, the City will provide informational and educational materials to the construction/development community to consider when planning projects or filing for permits. This will include guiding principles along with cost-effective measures that can be implemented into projects to reduce the potential of urban storm water runoff impacts.

The following materials will be developed and used in the construction site permit process:

- Handout/brochure explaining the permitting process for Part 91 and the NPDES Permit-By-Rule;
- Handout/brochure explaining the guiding principles for controlling runoff from construction sites (site planning, minimize soil movement, capture of sediment, good housekeeping practices, and minimization of post-construction activities); and,

	<ul style="list-style-type: none"> • Handout/brochure on BMPs for smaller, un-permitted sites providing information on good housekeeping and storm drain protection to minimize the entrance of construction site pollutants into storm drains.
Responsibility:	City Administration
Measure:	Copies and numbers of materials distributed. Improved SESC compliance.
Schedule:	Begin development in 4 th year and distribute in 5 th year.
Task VI-5.2:	Provide training to City staff on SESC and the CRCP.
Description:	<p>Adequate training of City staff will be necessary initially to educate personnel about appropriate BMPs and new procedures and then periodically to provide updates and ongoing training. Training of City personnel may take the form of short courses, workshops, certifications, in-house training, or supplying videos and reference manuals.</p> <p>Training of the following City personnel is essential to the success of the program:</p> <ul style="list-style-type: none"> • Staff that review construction plans • City site inspectors • Other City staff (i.e. construction division) that work on City projects
Responsibility:	City Administration
Measure:	Copy of training program and records.
Schedule:	Begin training in 2 nd year and provide periodically.

Table 8-5 (Section VIII) summarizes the implementation schedule, the tasks, and measures of the CRCP.

Section VII - Pollution Prevention and Good Housekeeping Plan

7.1 Pollution Prevention and Good Housekeeping Plan (PPGHP) Objectives

The purpose of the PPGHP is to monitor, evaluate, and improve pollution prevention measures at municipal and municipally-owned facilities. The evaluation will include, but is not limited to, the use and maintenance of: structural controls, roadways, vehicles, storm sewers, flood control mechanisms, road salt, pesticides and fertilizers.

The general objectives of the PPGHP are to:

1. Meet the required elements of a PPGHP as outlined in the permit;
2. Involve the municipal operations personnel in the decision-making, review, and implementation of the management plan;
3. Educate the municipal operations personnel in pollution prevention and good housekeeping and in the implementation of the management plan.

7.2 Current and Planned Efforts

The following paragraphs summarize the six (6) required elements of a PPGHP as specified in the MDEQ General Storm Water Permit (MIS040000) and the City's plan for addressing each. The City is committed to implementing activities in all six of the required elements in the first year of program implementation. Future scheduled activities and potential activities are listed under each element, as well. The information and actions encouraged by the PPGHP will be consistent with the regulations and plan objectives. Table 8-6 is a summary of the tasks, measures, and implementation schedule of the PPGHP.

Currently, the City performs several general maintenance activities to address storm water management and safety procedures. In the implementation of this plan, these activities will either be continued or augmented to correlate with Phase II regulations to ensure compliance.

Current Activities

Street Sweeping:	Major Streets – weekly Local Streets – twice or more annually
Leaf Pickup:	Performed September through December Advertised through the local newspaper and City website
Brush Pickup:	The City receives complaints from residents All brush is piled and chipped

Tree Removal:	Performed on an as-needed basis The City receives complaints, and/or acts upon storm damage Work is performed either by a contractor, or in-house
Tree Trimming:	Performed on an as-needed basis The City receives complaints, and/or acts upon storm damage Work is performed either by a contractor, or in-house
Sanitary Sewer Cleaning:	The City televises sanitary sewers and service leads on an as-needed basis. If damage is found, (within City easement), repairs are made. All sanitary mains are cleaned once per year. All work is contracted.
Storm Sewer Cleaning:	Complaints are received by the City for maintenance issues All work is performed in-house
Street Maintenance:	Annual reviews of potential resurfacing & upgrades of roads Work is performed if City budget and Council have approved
Snow Removal:	Removal done on an as-needed basis Police & staff monitor snow. It is removed at once, if necessary. All work is performed in-house

Planned Activities

1. Routine maintenance, maintenance schedules, and long-term inspection procedures of structural controls (i.e. storm drain catch basins, vegetated swales, infiltration basins, sedimentation basins, etc.).

Task VII-1.1:	Inventory of all storm water basins owned by the City.
Description:	Inventory of all storm water basins owned by the City to determine their location, design criteria, effectiveness and condition.
Responsibility:	City Administration/Facilities Management
Measure:	Map with locations of all basins, an indication of the estimated size, condition of inlets and/or outlets, condition of basin, and photos of basins.
Schedule:	Complete in the 4th year.
Task VII-1.2:	Develop inspection/cleanout program for all City storm water catch basins and manholes.
Description:	Develop an inspection and clean-out program for City storm water catch basins and manholes including a schedule protocol.
Responsibility:	City Administration/Facilities Management
Measure:	Copy of the program. Clean-out records of catch basins. Location of disposed material (i.e. landfill, etc.). Documentation of all complaints and reports of damaged catch basins. Documented corrective action for any complaints. Updated map.
Schedule:	Develop program in the 3 rd year, then inspection and cleaning to be ongoing.

Task VII-1.3: **Televising portions of storm water system that is underground as appropriate.**
Description: Video inspection of underground storm sewers where problems are suspected.
Responsibility: City Administration/Facilities Management
Measure: Video records of sewers.
Schedule: Complete in the 5th year.

Task VII-1.4: **Evaluate the use of vegetated swales and infiltration islands in new construction by the City.**
Description: Evaluate the feasibility of the use of vegetated swales, infiltration islands and other innovations to control storm water in new construction by the City.
Responsibility: City Administration/Facilities Management
Measure: Documentation of evaluation and conclusions and recommendations.
Schedule: Complete evaluation in the 2nd year.

2. *Municipal and municipally-owned roadway management to prevent pollution. This includes street sweeping, catch basin maintenance, and salt and sand management. In addition, concrete and asphalt wastewater cannot be discharged to the storm water system.*

Task VII-2.1: **Review, update, and implement a street sweeping program.**
Description: Review existing program, update as appropriate and implement changes.
Responsibility: Department of Public Works
Measure: Documentation of review and implementation. Sweeping records.
Schedule: Complete in the 2nd year.

Task VII-2.2: **Evaluate storage and containment of materials (sand, gravel, salt, oil, etc.) at the DPW Yard.**
Description: Evaluate storage and containment materials (i.e. sand, gravel, salt, oil, etc.) storage at the DPW. Ensure that runoff from these areas is handled and treated appropriately to reduce soil erosion, sedimentation and contamination.
Responsibility: Department of Public Works
Measure: Documentation of evaluation and plan for improvements.
Schedule: Begin evaluation in 3rd year and complete plan for improvements in 5th year.

Task VII-2.3: **Implement a catch basin cleaning program (See Task VII-1.2)**

3. *Ensure that all vehicle maintenance procedures do not impact storm water runoff. This includes attention paid to fuel handling, parts lubrication, parts degreasers, repairs and vehicle washing.*

Task VII-3.1: **Evaluation and correction of maintenance procedures and wash water management, including the use of floor drains, at all City facilities.**
Description: Evaluation of the vehicle maintenance procedures and wash water management, including the use of floor drains, at all City facilities. Correction or revision of policies and procedures as needed to protect surface and ground waters.
Responsibility: City Administration/Facilities Management
Measure: Documentation of evaluations and corrections,

Schedule: Begin evaluation in 3rd year and complete correction in the 4th year,

Task VII-3.2: Train DPW staff in pollution prevention, good housekeeping, and storm water management.

Description: Develop and provide training to DPW staff on pollution prevention and good housekeeping at City facilities, the PPGHP and storm water management in general.

Responsibility: City Administration/DPW

Measure: A copy of the training manual and attendance records.

Schedule: Develop and provide in 2nd year and periodically thereafter.

4. Locate and label all storm sewers within the City properties.

Task VII-4.1: Inventory of all catch basins and manholes in the City's storm conveyance system (See Task VII-1.1).

Task VII-4.2: Label existing manholes and catch basins.

Description: Label the existing manholes and catch basins in the City storm conveyance system to increase citizen awareness of the system and to minimize improper disposal.

Responsibility: City Administration/DPW

Measure: Documentation of labeling.

Schedule: Complete in the 3rd year.

Task VII-4.3: Labeling of catch basin and manhole covers in new construction.

Description: Catch basin and manhole cover labeling in accordance with OCDC's Office, utilizing imprinting and raised lettering on all new construction.

Responsibility: DPW/City Administration

Measure: Documentation of labeling.

Schedule: Begin in 4th year and on going thereafter.

5. Assess the impacts on water quality of any new construction and flood management projects within the City Properties.

Task VII-5.1: Evaluate the feasibility of reducing impervious surfaces in new construction by the City.

Description: Evaluate the feasibility of reducing impervious surfaces in new construction by the City including the use of pervious paving, green roofs, etc.

Responsibility: City Administration

Measure: Records of the evaluation, conclusions, and recommendations.

Schedule: Complete in the 2nd year

VII-Task 5.2: Encourage the use of vegetated swales and infiltration islands in all new construction by the City (See Task VII-1.4).

Task VII-5.3: Update building/construction project design procedures to consider innovative storm water design in new construction by the City.
Description: Modify the City’s procedures for building/construction project design to ensure that innovative storm water controls are considered for every new project.
Responsibility: City Administration
Measure: Copy of new procedures and documentation of considerations.
Schedule: Complete in the 2nd year.

Task VII-5.4: Evaluate all City ordinances for their impact in protecting water quality.
Description: Evaluate all City ordinances for their impact in protecting water quality with the aid of the SEMCOG handbook, “Opportunities for Water Resource Protection in Local Plans, Ordinances, and Programs.” 2002.
Responsibility: City Administration
Measure: Records of the evaluations, reviews and changes.
Schedule: Complete in the 2nd year.

6. Minimize the discharge of pollutants related to the storage, handling and use of pesticides and fertilizers. This includes employee training and soil testing for the proper application of any soil amendments.

Task VII-6.1: Employee training regarding the storage, handling, use and disposal of fertilizers and pesticides.
Description: Train DPW employees on the storage, handling, use and disposal of fertilizers and pesticides.
Responsibility: DPW
Measure: Copy of training manual and employee attendance records.
Schedule: Develop and provide training in the 2nd year and periodically thereafter.

Task VII-6.2: Require the use of low-phosphorus fertilizers on all City property.
Description: The City will require the use of low-phosphorus fertilizers on all properties owned or managed by the City.
Responsibility: City Administration/Facilities Management
Measure: Documented purchase and use of low-phosphorus fertilizer.
Schedule: Complete in the 5th year.

Task VII-6.3: Require soil testing of all City-owned or managed properties prior to the application of any fertilizer.
Description: The City will perform soil testing of all City-owned or managed properties prior to the application of any fertilizer.
Responsibility: DPW
Measure: Records of all tests and applications.
Schedule: Complete in the 5th year and ongoing thereafter.

Task VII-6.4:	Evaluate the implementation of Integrated Pest Management (IPM) on City-owned or operated property.
Description:	Evaluate the implementation of IPM, as tested and proven by the Michigan State University Turfgrass Management Program, to reduce the use of pesticides on City properties.
Responsibility:	DPW
Measure:	Feasibility report and recommendations.
Schedule:	5 th year then ongoing.

Table 8-6 (Section VIII) summarizes the implementation schedule, the tasks, and measures of the PPGHP.

Section VIII - Summary Tables

The City of South Lyon's comprehensive SWMP compiles the aspects of each of the six (6) minimum measures of MDEQ's Jurisdictional MS4 Phase II Permit as described in Sections II through VII. The following tables summarize the tasks, measurable goals, and implementation schedules of each of the six (6) minimum measure programs.

Table 8-1: Summary of Public Education Plan

REQUIREMENT	SCHEDULE Yr. After COC Issued	TASK	MEASURE
Encourage the public to report illicit discharges or improper disposal into storm sewers.	2 nd yr – ongoing	II-1.1 Design and implement a training program for City field staff on illicit discharge and illicit connection elimination.	Documentation of content of program. Training records.
	Complete in 2 nd yr	II-1.2 Use and encourage public use of the existing OCDC complaint receipt and response system.	Implementation of complaint system. Number of complaints received.
Educate the public on the availability, location, and requirements of facilities for the collection and/or disposal of household hazardous waste, travel trailer sanitary wastes, chemicals, grass clippings, leaf litter, animal wastes, and motor vehicle fluids.	2 nd yr – ongoing	II-2.1 Provide the public with information on household hazardous wastes and yard, travel trailer and vehicle maintenance wastes.	Copies of flyers and number distributed.
Public education concerning application and disposal of pesticides, herbicides, and fertilizers.	3 rd yr – ongoing	II-3.1 Provide the public with information on the proper use and disposal of yard chemicals.	Copies of flyers and number distributed.
Public education concerning preferred cleaning materials and procedures for non-commercial car washing.	3 rd yr – ongoing	II-4.1 Provide the public with information on community or ‘school’ car washes.	Copies of flyers and number distributed.
Public education concerning the ultimate discharge point and potential impacts of pollutants from the drainage system serving their places of residence. Public education concerning application and disposal of pesticides, herbicides, and fertilizers.	Complete in 3 rd yr	II-5.1 Storm sewer awareness training for residents.	Copy of training material. Attendance records.
	3 rd yr – ongoing	II-5.2 Create and publish news articles on the watershed.	Copies of published articles.
Public education for citizen responsibility and stewardship.	Complete in 1 st yr	II-6.1 Form a focus group of interested groups and citizens to advise and assist the City in implementing public education and storm water management	Successful formation of group. Meeting minutes. Attendance lists.
	4 th yr – complete in 5 th yr	II-6.2 Sponsor a workshop on ‘Low Impact Development’ for developers.	Video of workshop held. Attendance list. Response forms. Changes in development.
Public education concerning management of riparian lands to protect water quality.	Complete in 5 th yr	II-7.1 Provide the public with information on riparian land management and research the feasibility of related workshops.	Copies of flyers and number distributed. Workshop feasibility report.

Table 8-2: Summary of Public Involvement and Participation Plan

REQUIREMENT	SCHEDULE Yr. After COC Issued	TASK	MEASURE
Follow local public notice requirements, as appropriate, when notifying the public that the City must implement a storm water management plan. Make copies of draft and final management plans available to the public for comment and inform them as to when and where copies are available.	Complete in 1 st yr	III-1.1 Provide copies of the draft and the final SWMP to the public and interested groups.	Completion of all subtasks. Copies of all delivered documents. Number of copies distributed. Number of comments received. Number of hits on website.
	Complete in 1 st yr	III-1.2 Hold an informational meeting to discuss the draft SWMP and seek input.	Copies of announcement. Meeting held. Number of attendees. Comments received.
Establish and implement a citizen advisory committee for the purpose of encouraging public involvement in all aspects of the storm water management program.	Complete in 1 st yr	III-2.1 Form a SWMP citizen’s advisory committee of about 12 members to provide input on the specifics of the plan, etc., (See Task II-6.1).	Creation and implementation of the committee. Meeting minutes and attendance sheets.
	Complete in 2 nd yr	III-2.2 Develop and distribute a survey form to the citizens of South Lyon to determine the awareness and opinion of storm water and watershed issues. The survey content and format will be reviewed and approved by the Citizens Advisory Committee. Responses to the survey will be tabulated and the Advisory Committee will use the data to help them in their oversight of the program.	Distribution of the survey. Number and quality of the responses. Summary of responses. Documentation of use by Advisory Committee.

Table 8-2 (cont.): Summary of Public Involvement and Participation Plan

REQUIREMENT	SCHEDULE Yr. After COC Issued	TASK	MEASURE
Pursue cooperation with local stream or watershed protection organizations by informing them of the City’s program, providing them with copies of draft and final plans and seeking their input on the plans and program. Solicit volunteer assistance from the groups in the implementation of the program and associated activities. Satisfy permit requirements were possible by assisting the organizations with their efforts.	Complete in 1 st yr	III-3.1 Develop a mailing and contact list for local stream and watershed protection organizations and local sporting and environmental groups.	Creation of list.
	Complete in 1 st yr	III-3.2 Provide the target groups with draft copies of the SWMP using the mailing list and solicit comments on the Plan. Evaluate any comments received and incorporate as appropriate. Provide them with the final MDEQ approved version of the SWMP and solicit their participation in the future tasks and activities.	Completion of the mailing of the plans. Number of copies sent. Number of comments received. Number of volunteers recruited.
	Complete in 2 nd yr	III-3.3 Contact the target groups to determine what programs they sponsor that may satisfy SWMP or permit requirements. Evaluate qualifying programs to determine those in which the City will participate or encourage participation.	Number of programs evaluated. Number of programs in which the City participated. Number of citizens of South Lyon that participated.
	4 th yr, complete in 5 th yr	III-3.4 Investigate forming a volunteer water quality monitoring program to be initiated in cooperation with the Huron River Watershed Council or other similar group to collect and report data on the major water bodies in the area	Documentation of feasibility investigation. Data reported with annual submittal. Documentation of long-term improvement of water quality.

Table 8-3: Summary of Illicit Discharge Elimination Plan

REQUIREMENT	SCHEDULE Yr. After COC Issued	TASK	MEASURE
Develop the legal authority to allow monitoring and inspections, prohibit illicit connections and discharges, and require compliance.	Complete in 2 nd yr	IV-1.1 Review City's legal authority to implement IDEP program.	Documentation of ordinance review.
	Complete in 3 rd yr	IV-1.2 Amend and adopt ordinance.	Documentation of adoption. Copy of ordinance.
Prepare a drainage system map of all known City outfalls.	Complete in 1 st yr	IV-2.1 Update the City storm sewer maps into GIS format.	Documentation of updated maps and summary tables.
	2 nd yr – complete in 4 th yr	IV-2.2 Field verification of known outfalls and update maps and outfall table.	Map & table updated.
	Complete in 3 rd yr	IV-2.3 Develop procedure to identify and record outfalls from new construction.	Procedure documented and implemented. New outfalls identified & mapped.
Develop a program to identify and eliminate illicit connections and discharges.	2 nd yr – complete in 4 th yr repeat visual every 5 yrs	IV-3.1 Perform visual inspection and dry weather screening of all City storm outfalls.	Documentation of findings. Number of illicit found.
	2 nd yr – ongoing	IV-3.2 Trace illicit discharges and notify responsible party to correct.	Number of illicit traced. Documentation of notification and elimination.
	4 th yr – ongoing	IV-3.3 Follow-up enforcement action for non-correction.	Number of illicit found vs. eliminated. Documentation of actions.
Develop a program to minimize seepage from sanitary sewers and OSDS into the MS4.	Complete in 1 st yr	IV-4.1 Identify and record all OSDS sites.	List/map of location of all OSDS sites.
	1 st yr – ongoing	IV-4.2 Enforce existing sewer connection ordinance and any new ordinances.	Number of OSDS sites connected to the sanitary sewer.
	2 nd yr – complete 3 rd yr	IV-4.3 Review OCDH OSDS program. Amend and adopt a local ordinance, if necessary.	Documentation of County program/ordinance review. Local ordinance revised and adopted, if needed
	2 nd yr – ongoing	IV-4.4 Establish OSDS complaint reporting and tracking system for suspicious discharges. (See Task II-1.2)	Documentation of complaints, investigation, resolution and follow-up to reporting citizen.
	Report in 5 th year, on going	IV-4.5 Evaluate the integrity of the sanitary sewers in the City.	Report of evaluation and recommendations.
Coordinate program.	1 st yr – ongoing	IV-5.1 Coordinate with OCDC and OCDH to address complaint response, etc.	Implement procedure. Number of illicit referred.
	1 st yr – ongoing	IV-5.2 Coordinate with MDEQ to meet regulatory requirements.	Annual report and documentation of other referrals.

Table 8-4: Summary of Post-Construction Storm Water Management Program

REQUIREMENT	SCHEDULE Yr. After COC Issued	TASK	MEASURE
Develop a storm water master plan.	Complete in 3 rd yr	V-1.1 Prepare and adopt a storm water master plan.	Documentation of adoption.
Develop legal authority to address post-construction storm water runoff.	3 rd yr – complete in 4 th yr	V-2.1 Review City's legal authority to implement program and amend and adopt ordinances or procedures.	Updated ordinance/procedure to comply with permit needs.
	2 nd yr – ongoing	V-2.2 Provide training for City field staff on P-CMP	Copy of training program. Training records.
	4 th yr – complete 5 th yr	V-2.3 Provide information on P-CMP to the development community.	Copies of information. Number distributed. Documented changes in construction.
	4 th yr – complete in 5 th yr	V-2.4 Implement a post-construction inspection program	Inspection records.
	Complete in 3 rd yr	V-2.5 Develop documentation and reporting procedures.	Copy of the procedures.
	4 th yr – complete in 5 th yr	V-2.6 Develop a Long-Term Maintenance and Operations program.	Copy of the program.
Review and revise plan review procedures and requirements.	3 rd yr – complete in 4 th yr	V-3.1 Revise plan review procedures to include P-CMP for new development and redevelopment.	Documentation of review and copy of review procedure.
Coordinate the implementation of P-CMP efforts with other governmental agencies.	2 nd yr – ongoing	V-4.1 Coordinate P-CMP with other agencies.	Documentation of efforts.

Table 8-5: Summary of Construction Storm Water Runoff Control Program

REQUIREMENT	SCHEDULE Yr. After COC Issued	TASK	MEASURE
Notify appropriate regulatory agency if construction results in the deposition of solids, etc. into MS4.	2 nd yr – ongoing	VI-1.1 Coordinate SESC with the OCDC.	Documentation of referrals and other issues.
	2 nd yr – ongoing	VI-1.2 Coordinate SESC with the MDEQ	Documentation of contacts with the MDEQ.
Develop and implement a procedure to receive complaints regarding construction.	2 nd yr – ongoing	VI-2.1 Establish and use a complaint tracking, response and investigation system (See Task II-1.2)	Documentation of complaint receipt and response.
Review preliminary construction plans to ensure adequate SESC.	1 st yr – complete in 2 nd yr	VI-3.1 Review the OCDC SESC program.	Documentation of review and compliance with Phase II.
	2 nd yr – complete in 3 rd yr	VI-3.2 Review and revise City ordinances as needed to implement the CRCP.	Documentation of review and changes.
	2 nd yr – complete in 3 rd yr	VI-3.3 Review and revise the City’s site plan review to include CRCP.	Documentation of site plan reviews.
Provide appropriate BMPs and measures for those BMPs to address storm water runoff from construction areas.	3 rd yr – complete in 5 th yr	VI-4.1 Provide appropriate BMPs for SESC.	Document that appropriate BMPs were used at sites.
	3 rd yr – complete in 5 th yr	VI-4.2 Provide measurable goals for each BMP.	Document performance of BMPs.
Provide educational materials and outreach.	4 th yr – complete 5 th yr	VI-5.1 Provide outreach and education to the construction community on SESC and CRCP.	Copies of materials distributed. Number distributed. Improved SESC compliance.
	2 nd yr – ongoing	VI-5.2 Provide training to City field staff on SESC and the CRCP.	Copy of training provided. Training records.

Table 8-6: Summary of Pollution Prevention and Good Housekeeping Plan

REQUIREMENT	SCHEDULE Yr. After COC Issued	TASK	MEASURE
Routine maintenance, maintenance schedules, and long-term inspection procedures of structural controls.	Complete in 4 th yr	VII-1.1 Inventory of all storm water basins within the City properties.	Map showing location of basins.
	Complete in 3 rd yr	VII-1.2 Develop a catch basin and manhole inventory and cleanout program.	Copy of program. Clean-out records.
	Complete in 5 th yr	VII-1.3 Televising underground storm sewer system as appropriate.	Video records.
	Complete in 2 nd yr	VII-1.4 Evaluate the use of vegetated swales, etc., in new construction by the City.	Documentation of evaluation.
Municipal and municipally-owned roadway management to prevent pollution.	Complete in 2 nd yr	VII-2.1 Update street sweeping program.	Sweeping records. Spoils testing results.
	3 rd yr – complete in 5 th yr	VII-2.2 Evaluation of storage and containment of materials at City DPW yard.	Records of evaluations and planned changes.
	Complete in 3 rd yr	VII-2.3 Implement a catch basin cleaning program (See Task VII-1.2).	Copy of program. Clean-out records.
Ensure that all vehicle maintenance procedures do not impact storm water runoff.	3 rd yr – complete in 4 th yr	VII-3.1 Evaluation and correction of maintenance procedures and wash water management at all City facilities.	Documentation of evaluations and corrective actions.
	2 nd yr – ongoing	VII-3.2 Employee training on PPGH	Copy of training manual. Training records.
Locate and label all storm sewers within the City properties.	Complete in 3 rd yr	VII-4.1 Catch Basin and manhole inventory (See Task VII-1.2).	Documented records of labeling. Photo-documentation.
	Complete in 3 rd yr	VII-4.2 Label existing manholes and catch basins.	Documentation of labeling.
	4 th yr – ongoing	VII-4.3 Imprinted labeling on new catch basins and curb stops.	Documentation of labeling.

Table 8-6 (cont.): Summary of Pollution Prevention and Good Housekeeping Plan

REQUIREMENT	SCHEDULE Yr. After COC Issued	TASK	MEASURE
Assess the impacts on water quality of any new construction and flood management projects within the City properties.	Complete in 2 nd yr	VII-5.1 Evaluate the reduction of impervious surfaces in all new City construction.	Documentation of evaluation.
	Complete in 2 nd yr	VII-5.2 Evaluate the use of vegetated swales and infiltration islands in all new City construction (See Task VII-1.4).	Documentation of evaluation.
	Complete in 2 nd yr	VII-5.3 Update City building design procedures to consider innovative storm water controls.	Copy of new procedures. Documentation of considerations.
	Complete in 2 nd yr	VII-5.4 Evaluate City procedures and ordinances utilizing the SEMCOG handbook.	Documentation of review and changes.
Minimize the discharge of pollutants related to the storage, handling, and use of pesticides and fertilizers.	2 nd yr – ongoing	VII-6.1 Training of City field staff that addresses fertilizers and pesticides.	Copy of training materials. Training records.
	Complete in 5 th yr	VII-6.2 Require the use of low-phosphorus fertilizers on all City properties.	Documented purchase and use.
	5 th yr – ongoing	VII-6.3 Require soil testing of all City properties before fertilizer application.	Records of all tests and applications.
	5 th yr – ongoing	VII-6.4 Evaluate use of Integrated Pest Management on City properties.	Feasibility report.

Table 8-7: SWMP Implementation Schedule by Minimum Measure Plan

Task #	Plan/Task	Time to Start & Completion Following COC Issuance (yrs.)					
		0 to 1	1 to 2	2 to 3	3 to 4	4 to 5	5 +
	SWMP						
	Review the minimum measure plans and report progress and changes semi-annually and annually.						
	PEP						
II-1.1	Design and implement a training program for City field staff on IDEP.						
II-1.2	Use and encourage public use of the existing OCDC complaint receipt and response system.						
II-2.1	Provide the public with information on household, yard, travel trailer and vehicle maintenance wastes.						
II-3.1	Provide the public with information on the disposal of yard chemicals.						
II-4.1	Provide the public with information on community or ‘school’ car washes.						
II-5.1	Storm sewer awareness training for residents, business owners and the public.						
II-5.2	Newspaper/Newsletter articles on the watershed.						
II-6.1	Form a focus group of interested groups and citizens to advise and assist the City.						
II-6.2	Sponsor a workshop on “Low-Impact Development”.						
II-7.1	Public education concerning management of riparian lands to protect water quality.						
	PIPP						
III-1.1	Provide copies of the draft and the final SWMP to the public and interested groups.						
III-1.2	Hold an informational meeting to discuss the draft SWMP and seek input.						
III-2.1	Form a SWMP citizen’s advisory committee to provide input and assist (See Task II-6.1).						
III-2.2	Develop and distribute an awareness survey form to the citizens of South Lyon.						
III-3.1	Develop a mailing and contact list for local stream and watershed protection organizations, etc.						
III-3.2	Provide the target groups with draft and final copies of the SWMP and solicit and evaluate comment on the plan.						
III-3.3	Contact the target groups to review and evaluate programs they sponsor that may satisfy SWMP requirements.						
III-3.4	Investigate a volunteer water quality monitoring program to report data on the water bodies in the area.						

Table 8-7 (cont.): SWMP Implementation Schedule by Minimum Measure Plan

Task #	Plan/Task	Time to Start & Completion Following COC Issuance (yrs.)					
		0 to 1	1 to 2	2 to 3	3 to 4	4 to 5	5 +
	IDEP						
IV-1.1	Review existing City ordinances to ensure adequate legal authority.						
IV-1.2	Amend and adopt new ordinances as necessary.						
IV-2.1	Update the City storm sewer maps into GIS format.						
IV-2.2	Field verify all City storm conveyance outfalls and update maps and tables.						
IV-2.3	Develop procedures to identify and record outfalls from new construction.						
IV-3.1	Perform visual inspections and dry weather screenings of all City operated storm sewer outfalls.						
IV-3.2	Trace illicit discharges/connections and notify responsible party to correct.						
IV-3.3	Follow-up enforcement for non-correction.						
IV-4.1	Identify and record all OSDS within the City.						
IV-4.2	Continue enforcement of City sewer connection ordinance.						
IV-4.3	Review Oakland County Department of Public Health (OCDH) OSDS program and ordinance.						
IV-4.4	Develop and utilize OSDS complaint tracking, response and investigation system (see Task II-1.2).						
IV-4.5	Evaluate the integrity of the sanitary sewers in the City.						
IV-5.1	Coordination with OCDC and OCDH.						
IV-5.2	Coordination with MDEQ.						
	P-CMP						
V-1.1	Prepare and adopt a storm water master plan.						
V-2.1	Adopt policies, ordinances or other regulatory mechanisms to require appropriate BMPs.						
V-2.2	Provide training for City field staff.						
V-2.3	Prepare informational materials and conduct outreach for the development community.						
V-2.4	Implement an inspection program for post-construction BMPs.						
V-2.5	Develop documentation and reporting procedures for program..						
V-2.6	Develop and implement a Long-Term Maintenance and Operations Program for post-construction.						
V-3.1	Revise plan review procedures for new development/redevelopment to ensure post-construction control.						
V-4.1	Coordinate with other government agencies.						

Table 8-7 (cont.): SWMP Implementation Schedule by Minimum Measure Plan

Task #	Plan/Task	Time to Start & Completion Following COC Issuance (yrs.)					
		0 to 1	1 to 2	2 to 3	3 to 4	4 to 5	5 +
	CRCP						
V1-1.1	Coordinate with the OCDC.						
V1-1.2	Coordinate with MDEQ.						
V1-2.1	Develop and utilize a complaint tracking, response and investigation system (see Task II-1.2).						
V1-3.1	Review the existing Soil Erosion and Sedimentation Control Program administered by OCDC.						
V1-3.2	Review and revise existing City ordinances as necessary to implement the CRCP.						
V1-3.3	Review and revise the City's plan review process.						
V1-4.1	Provide appropriate BMPs.						
V1-4.2	Provide measurable goals for each BMP.						
V1-5.1	Provide outreach and distribute educational materials to the construction community.						
V1-5.2	Provide training to City field staff on SESC and the CRCP.						
	PPGH						
VII-1.1	Conduct an inventory of all City storm water basins.						
VII-1.2	Develop inspection/cleanout program for all City storm water catch basins and manholes.						
VII-1.3	Televise City underground storm sewer conveyance system as appropriate.						
VII-1.4	Evaluate the use of vegetated swales in new construction by the City.						
VII-2.1	Review and update the City street sweeping program.						
VII-2.2	Evaluate the storage and containment of materials (sand, gravel, salt, oils, etc.) at the DPW yard.						
VII-2.3	Implement a catch basin cleaning program (see Task VII-1.2).						
VII-3.1	Evaluate and correct as necessary storm water drainage including floor drains at City facilities.						
VII-3.2	Storm water management training for City field staff.						
VII-4.1	Conduct and inventory of all City storm water catch basins and manholes (see Task VII-1.2).						
VII-4.2	Label existing storm water system catch basins and manholes.						
VII-4.3	Label new storm water system catch basins and manholes using imprinting and raised lettering.						
VII-5.1	Evaluate means to reduce impervious surfaces in new construction by the City.						
VII-5.2	Evaluate the use of vegetated swales and infiltration islands in new construction by the City.						
VII-5.3	Update City building design procedures to consider innovative storm water design.						
VII-5.4	Evaluate City procedures and ordinances utilizing the SEMCOG handbook.						
VII-6.1	Provide training to City field and facility staff on the handling and storage of fertilizers and pesticides.						
VII-6.2	Require the use of low-phosphorus fertilizers on all City owned or managed properties.						
VII-6.3	Require soil testing on all City owned or managed properties prior to application of fertilizers.						
VII-6.4	Evaluate the use of Integrated Pest Management.						

Table 8-8: SWMP Implementation Schedule by Year

Task#	Year/tasks
1st year (12/03-12/04)	
II-6.1	Form a focus group of interested groups and citizens to advise and assist the City.
III-1.1	Provide copies of the draft and the final SWMP to the public and interested groups.
III-1.2	Hold an informational meeting to discuss the draft SWMP and seek input.
III-2.1	Form a SWMP citizen’s advisory committee to provide input and assist (See Task II--6.1).
III-3.1	Develop a mailing and contact list for local stream and watershed protection organizations, etc.
III-3.2	Provide the target groups with draft copies of the SWMP and solicit and evaluate comment on the plan.
IV-2.1	Update the City storm sewer maps into GIS format.
IV-4.1	Identify and record all OSDS within the City.
IV-4.2	Continue enforcement of City sewer connection ordinance.
IV-5.1	Coordination with OCDC and OCDH.
IV-5.2	Coordination with MDEQ.
V1-3.1	Review the existing Soil Erosion and Sedimentation Control Program administered by OCDC.
2nd Year (2005)	
	Review the minimum measure plans and report progress and changes semi-annually and annually.
II-1.1	Design and implement a training program for City field staff on IDEP.
II-1.2	Use and encourage public use of the existing OCDC complaint receipt and response system.
III-2.2	Develop and distribute an awareness survey form to the citizens of South Lyon.
III-3.3	Contact the target groups to review and evaluate programs they sponsor that may satisfy SWMP.
IV-1.1	Review existing City ordinances to ensure adequate legal authority.
IV-2.2	Field verify all City storm conveyance outfalls and update maps and tables.
IV-3.1	Perform visual inspections and dry weather screenings of all City operated storm sewer outfalls.
IV-3.2	Trace illicit discharges/connections and notify responsible party to correct.
IV-4.3	Review Oakland County Department of Public Health (OCDH) OSDS program and ordinance.
IV-4.4	Develop and utilize OSDS complaint tracking, response and investigation system (see II-1.2).
V-2.2	Provide training for City field staff.
V-4.1	Coordinate with other government agencies.
V1-1.1	Coordinate with the OCDC.
V1-1.2	Coordinate with MDEQ.
V1-2.1	Develop and utilize a complaint tracking, response and investigation system (see II-1.2).
V1-3.2	Review and revise existing City ordinances as necessary to implement the CRCP.
V1-3.3	Review and revise the City’s plan review process.
V1-5.2	Provide training to City field staff on SESC and the CRCP.
VII-1.4	Evaluate the use of vegetated swales in new construction by the City.
VII-2.1	Review and update the City street sweeping program.
VII-3.2	Storm water management training for City field staff.
VII-5.1	Evaluate means to reduce impervious surfaces in new construction by the City.
VII-5.2	Evaluate the use of vegetated swales and infiltration islands in new construction by the City.
VII-5.3	Update City building design procedures to consider innovative storm water design.
VII-5.4	Evaluate City procedures and ordinances utilizing the SEMCOG handbook.
VII-6.1	Provide training to City field and facility staff on the handling and storage of fertilizers and pesticides.

Table 8-8 (cont.): SWMP Implementation Schedule by Year

Task#	Year/tasks
3rd Year (2006)	
II-2.1	Provide the public with information on household, yard, travel trailer and vehicle maintenance wastes.
II-3.1	Provide the public with information on the disposal of yard chemicals.
II-4.1	Provide the public with information on community or 'school' car washes.
II-5.1	Storm sewer awareness training for residents.
II-5.2	Newspaper/Newsletter articles on the watershed.
IV-1.2	Amend and adopt new ordinances as necessary.
IV-2.3	Develop procedures to identify and record outfalls from new construction.
V-1.1	Prepare and adopt a storm water master plan.
V-2.1	Adopt policies, ordinances or other regulatory mechanisms to require appropriate BMPs.
V-2.5	Develop documentation and reporting procedures for program.
V-3.1	Revise plan review procedures for new development/redevelopment to ensure post-construction control.
V1-4.1	Provide appropriate BMPs.
V1-4.2	Provide measurable goals for each BMP.
VII-1.2	Develop a catch basin and manhole clean-out program.
VII-2.2	Evaluate the storage and containment of materials (sand, gravel, salt, oils, etc.) at the DPW yard.
VII-2.3	Implement a catch basin cleaning program (see VII-1.2).
VII-3.1	Evaluate and correct as necessary storm water drainage including floor drains at City facilities.
VII-4.1	Conduct an inventory of all City storm water catch basins and manholes (see VII-1.2).
VII-4.2	Label existing storm water system catch basins and manholes.
4th Year (2007)	
II-6.2	Sponsor a workshop on "Low-Impact Development".
III-3.4	Investigate a volunteer water quality monitoring program to report data on the water bodies in the area.
IV-3.3	Follow-up enforcement for non-correction.
V-2.3	Prepare informational materials and conduct outreach for the development community.
V-2.4	Implement an inspection program for post-construction BMPs.
V-2.6	Develop and implement a Long-Term Maintenance and Operations Program for post-construction.
V1-5.1	Provide outreach and distribute educational materials to the construction community.
VII-1.1	Conduct an inventory of all City storm water basins.
VII-4.3	Label new storm water system catch basins and manholes using imprinting and raised lettering.
5th Year (2008)	
II-7.1	Public education concerning management of riparian lands to protect water quality.
IV-4.5	Evaluate the integrity of the sanitary sewers in the City.
VII-1.3	Televise City underground storm sewer conveyance system as appropriate.
VII-6.2	Require the use of low-phosphorus fertilizers on all City owned or managed properties.
VII-6.3	Require soil testing on all City owned or managed properties prior to application of fertilizers.
VII-6.4	Evaluate the use of Integrated Pest Management.