

2. PROGRESS REPORTING BY ACTIVITY

2.1. OVERVIEW

This chapter describes actions MDOT completed to fulfill the Permit requirements during the reporting period. The reporting information is contained on activity sheets as originally introduced in the Storm Water Management Plan (SWMP). Each activity is described in Section 2.7 of this plan and includes the following information:

- Activity name,
- Parties affected or targeted by the activity,
- Objective/description of the activity,
- Annual report information,
- Measurable goals and interim milestones associated with the activity,
- Implementation schedule, and
- Implementation Team responsible for completing the activity.

The activities are organized into five groups; Education/Outreach (E), Training (T), Illicit Discharge Elimination Program (I), Construction, Post-Construction, and Good Housekeeping BMPs (C) and Administrative (A). The following is a list of activities by group:

Education/Outreach Activities

- E-1: Maintain and Use Lansing Information Center
- E-2: Publish Articles in MDOT Publications
- E-3: Provide Information on Watershed Stewardship on MDOT Public Web Site
- E-4: Provide Education Materials along with Discharge/Tap-In Permit Applications
- E-5: Notify and Invite Public to Review and Comment on the Storm Water Management Plan
- E-6: Determine Partnership Potential with MDEQ Statewide Public Education Program

Training Activities

- T-1: Present Applicable Training Modules to the Job-Related Public
- T-2: Certify MDOT's Staff for Pesticide/Fertilizer Application
- T-3: Train Staff Responsible for Administering Part 91 and those having Decision Making Authority for SESC Plan Development or Review, Inspections, or Enforcement; and Stormwater Operators as Required under Part 31
- T-4: Survey MDOT Staff on Storm Water Knowledge

Illicit Discharge Elimination Program Activities

- I-1: Submit and Implement Mapping Schedule for Outfalls (urbanized areas only)
- I-2: Perform Inventory and Dry Weather Screening on Outfalls
- I-3: Receiving and Notifying MDEQ of Illicit Discharges and Actions Taken
- I-4: Report Updates and Changes to Legal Authority Status
- I-5: Map Known Outfalls (statewide)

Construction, Post Construction, and Good Housekeeping BMPs

- C-1: Maintenance Requirements for MDOT Permanent Best Management Practices (BMP)s (Post-Construction)
- C-2: Identify and Coordinate with Metropolitan Planning Organizations (MPO)s having Storm Water Quality Control Programs
- C-3: Procedure to Select, Apply, and Maintain Permanent Best Management Practices (BMP)s for Storm Water Management Activities (Post-Construction)
- C-4: Procedure to Work with MDEQ for Early Coordination on Initial Design Projects
- C-5: Review Projects with Storm Water Discharges to Water Bodies with a Promulgated Total Maximum Daily Load (TMDL)
- C-6: Implement Procedures to Select, Apply, and Maintain Permanent Best Management Practices for Storm Water Management Activities (Post-Construction)
- C-7: Internal Quality Assurance/Quality Control (QA/QC) Protocol for Construction Storm Water Control
- C-8: Periodically Update Drainage Manual
- C-9: Documentation and Tracking of Road Maintenance Activities
- C-10: Procedure for Outfall Labeling
- C-11: Review Flow Control Structures
- C-12: Audit the Pollution Incident Prevention Plan (PIPP) Requirements

Administrative Activities

- A-1: Program Assessment and Reporting

2.2. IMPLEMENTED/COMPLETED ACTIVITIES

Shaded portions of the table indicate that the milestone or goal has been met while un-shaded portions of the table indicate that the milestone or goal is still active. An explanation of any changes to the activity is included in the summary.

2.3 ACTIVITIES REFERENCED IN THE SWMP

Activity E-1: Maintain and Use Lansing Information Center

Objective: To maintain a library of storm water-related materials for training and educating the job-related public, including video tapes, reference manuals and publications.

Description: A library of informational materials compiled to support activities performed for the MDOT Storm Water Management Plan. The Lansing Information Center (LIC) is open and located in the MDOT Library housed at the Murray D. Van Wagoner Building, 425 W. Ottawa Street, Lansing MI 48909. Materials can be checked out by contacting the MDOT librarian.

Progress Report: MDOT will take steps to increase usage of the LIC including more effective advertisement of available information and more effective integration of the information in the environmental clearance process. The LIC has been incorporated into the MDOT technical Library making the documents more readily available to all staff and outside individuals.

The LIC includes the following materials:

- Detention Pond Maintenance 101 (video) by Canton Township, Michigan
- National Cooperative Highway Research Program (NCHRP) Report 521 "Identification of Research Needs Related to Highway Runoff Management"
- The National Highway Runoff Data and Methodology Synthesis (vol. 1 - 3)
- EMS: A Bridge for Organizational Coordination and Communications. American Association of State Highway and Transportation Officials, 2004.
- EMS: Making the Case for an Environmental Management System. American Association of State Highway and Transportation Officials.
- Chemical Deicers and The Environment (Frank M. D'Itri)
- Rain Garden CD-ROM of Compiled Design Information
- Storm Sewer Maintenance Study for Livonia (Final Report dated December, 2001)
- Various Research Articles on Deicers/Additives (still being referenced and compiled)
- Various Research Articles on the effects of detention and thermal load (still being referenced and compiled)

Planned Activity: Books and materials on storm water management were made available to MDOT employees earlier this year. A tracking system is being developed to track checked out materials and quarterly notices will be made in the Monday Memo to advertise the storm water-related library material. In future annual progress reports, only new additions to the LIC will be listed here.

No.	Measurable Goals	Schedule	Responsible
1	The library of storm water-related materials will be updated quarterly with the most recent guidance, research, publications and training materials.	Quarterly, On-going	MDOT Sponsored Education and Outreach Team (E&O Team)
2	A list of storm water-related materials will be updated quarterly on the MDOT Storm Water Public Web Site.	Starting December 31, 2006	
3	Quarterly notices will be made in the Monday Memo to advertise the storm water-related library material.	By August 1, 2005 [On-going]	
4	The library of storm water-related materials will be moved to a more prominent location.	By August 1, 2005 [Completed]	
5	A system will be developed to track the checkout of library materials.	By August 1, 2005	
6	A general survey of storm water awareness will be conducted as described in Activity T-4. The survey will be designed to assess the educational program as a whole including the effectiveness of article publication.	Baseline Survey-2005 [Completed]	Storm Water Program Manager
7	A follow up survey will be conducted in 2008 to assess the need for program modifications.	Follow up Survey-2008	Storm Water Program Manager

Activity E-2: Publish and Distribute Educational Materials

Objective: To educate the job-related public on watershed stewardship, the MDOT storm water program, illicit discharges, construction and post-construction BMPs, and/or new program announcements.

Description: Prepare storm water program articles for publication using internal MDOT publications or other publications as applicable. The articles are to provide information about the MDOT storm water program in a manner to gain understanding and support for implementing the program by the job-related public.

Progress Report: An article about MDOT's storm water management program was published in the Michigan Infrastructure and Transportation Association (MITA) magazine "CrossSection" in the Summer 2005 edition. CrossSection reaches contractor and MDOT Staff as well as contract agencies.

Table 2-1 contains information regarding the distribution of storm water-related educational materials to the job-related public. The table defines the type or name of the educational material, the date it was distributed, and the number distributed. In addition to the material distribution noted in Table 2-1, materials were also distributed at conferences and workshops. A table of conferences and workshops is included in Appendix D.

Included in Table 2-1 is the distribution of MDOT's storm water management brochure and storm water management litterbag. These materials were originally developed as part of the Phase I storm water management program and were updated in 2005 to reflect Phase II requirements. The brochure discusses the intent of the MDOT SWMP and educates about illicit discharges. The litterbag lists several general watershed stewardship tips and can be used for automobile trash, which may otherwise be thrown out onto the highway.



A cleaner streams mascot, "DOT the Drop" is being introduced to MDOT via an animation about storm water awareness and BMPs. "DOT" is being incorporated into all storm water educational materials put out by MDOT. The Phase II educational materials that were developed in 2005 include the following:

- General Storm Water Display for Kids and the General Public
- General Storm Water Management Brochure
- General Storm Water Flyer for Kids
- Soil Erosion and Sedimentation Control Poster
- Automobile Litter Bag
- MDOT's Cleaner Streams Mascot "DOT the Drop"
- Soil Erosion and Sedimentation Control Display

These materials can be downloaded from the MDOT Storm Water Public Web Site at <http://www.michigan.gov/stormwatermgt> by clicking 'Education' and then 'Public Education'.

Planned Activity: MDOT plans to submit an article for each quarterly printing of the MITA CrossSection throughout 2006. The article for the Spring 2006 edition will target MDOT contractors and will discuss MDOT's soil erosion and sedimentation control program. MDOT will continue to distribute storm water educational materials at conferences, workshops, and other applicable events in 2006.

Table 2-1 Educational Material Distribution

Name of Educational Material	Date of Education Material Distribution	Number Distributed
MAPA Conference Brochure	4/20/2005	200
Operation Care - Phase I Brochure	4/26/2005	750
Phase I Brochure -Grand Region	4/26/2005	100
Phase I Brochure - Shadow Day	4/26/2005	200
Operation Care - Litter Bags	4/26/2005	200
Operation Care - Litter Bags	5/4/2005	300
MITA CrossSection article	June 2005	
Litter Bags – MDOT Environmental group	5/13/2005	100
Rouge Water Festival - kids display	September 2005	100
SW Region Career Day - kids display	October 2005	200

No.	Measurable Goals	Schedule	Responsible
1	Develop and publish storm water-related articles in a Region-based newsletter, Adopt-A-Highway newsletter, Monday Memo, or other appropriate newsletters at least quarterly throughout the Permit cycle. Contract agencies will be included on the newsletter distribution list.	Quarterly beginning April 1, 2006	E&O Team and MDOT Communications Staff.
2	Provide storm water information to contract agencies through the Michigan Local Technical Assistance Program (LTAP).	By February 1, 2006	E&O Team and Maintenance Environmental Team (MET)
3	A general survey of storm water awareness will be conducted as described in Activity T-4. The survey will be designed to assess the educational program as a whole including the effectiveness of article publication.	Baseline Survey-2005 [Completed]	Storm Water Program Manager
4	A follow up survey will be conducted in 2008 to assess the need for program modifications.	Follow up Survey- 2008	Storm Water Program Manager

Activity E-3: Provide Information on Watershed Stewardship on the MDOT Public Web Site

Objective: To educate the job-related and traveling public on MDOT's watershed stewardship practices and promote these practices on all projects where feasible.

Description: MDOT developed a Storm Water Public Web Page on MDOT's Public Web Site and an internal storm water page on Connect MDOT (intranet). The Web pages are devoted to storm water management information and contain general information about watershed stewardship practices as well as links to pertinent storm water-related materials. This information is maintained and monitored to report Web site usage. The MDOT Public Storm Water Web Page is located at <http://www.michigan.gov/stormwatermgt>.

Progress Report: During this annual reporting period, the MDOT Public Storm Water Web Page received 3409 external hits. The Connect Intranet storm water page received 32 hits. In addition, the MDOT Public Storm Water Web Page was tracked for document downloads and hits to other pages originating from the main storm water page. This additional information is in Appendix A of this annual report.

A limited search was conducted of community Web sites and 17 communities, particularly in the Grand Rapids area, were found to have a link from their Web site to the MDOT Public Storm Water Web Page. These links help distribute MDOT's storm water information. MDOT's Web page also displays the storm water educational materials and invites communities to contact MDOT if they would like to use their materials.

A Web page survey form is located on the MDOT Public Storm Water Web Page so that visitors may electronically submit input about the Web page. Rather than post an additional quiz or survey on the Web site as indicated in the measurable goals for this activity, a Jeopardy-type game is being developed to post on the Web page. Visitors will be able to play the game on the Web page and learn the effects of daily activities on storm water.

Planned Activity: The MDOT Public Storm Water Web Page was updated in December of 2005 and will be routinely reviewed for updating on a quarterly basis. New articles and educational materials will be posted on the Web site throughout the year.

No.	Measurable Goals	Schedule	Responsible
1	The MDOT Storm Water Public Web Page will be updated quarterly with the most recent MDOT storm water information and news.	Quarterly	E&O Team and MDOT Information and Technology Mgr.
2	A link to the MDOT Storm Water Public Web Page will be added to the MDOT Public Web Site home page. [Modified] <i>The MDOT Storm Water Public Web Page link will be made more prominent and user friendly.</i>	By April 1, 2006	Storm Water Program Manager
3	A storm water-related quiz/comment form will be developed for inclusion on the MDOT Storm Water Public Web Page. [Modified] <i>A Jeopardy-type format has been selected for this activity.</i>	By December 31, 2005	E&O Team and MDOT Information and Technology Mgr
4	A general survey of storm water awareness will be conducted as described in Activity T-4. The survey will be designed to assess the educational program as a whole including the effectiveness of article publication.	Baseline Survey-2005 [Completed]	Storm Water Program Manager
5	A follow up survey will be conducted in 2008 to assess the need for program modifications.	Follow up Survey- 2008	Storm Water Program Manager

Activity E-4: Provide Education Materials along with Tap-In/Discharge Permit Applications

Objectives: To inform applicants of acceptable discharges into the MDOT drainage system, and also of the potential negative impacts to water quality from unacceptable or illegal discharges and ways to mitigate these impacts. To inform MDOT permitting and utilities staff statewide that this education material will be distributed with the tap-in/discharge permit and that educating applicants is important to protecting water quality.

Description: Prepared education materials for typical development activities connecting to MDOT facilities. Established and implemented procedures for distributing these materials.

Progress Report: MDOT developed educational materials in November 2004. These materials are currently being provided to applicants seeking tap-in/discharge permits for accessing MDOT’s drainage system. This material focuses on prohibiting the occurrence of illicit connections into MDOT’s system and includes information describing an illicit discharge/connection and reporting/contact information. The educational material is integrated into the application to ensure distribution. In addition, the MDOT Storm Water Management brochure is distributed with the permit application.

During this annual reporting period, 54 permit applications with educational material were distributed.

Planned Activity: MDOT will continue to distribute educational material to 100% of tap-in/discharge permit applicants.

No.	Interim Milestones	Schedule	Responsible
1	Develop educational material to be included in the tap-in/discharge permit application.	Completed in November 2004	IDEP Team
No.	Measurable Goals	Schedule	Responsible
1	Distribute education materials to 100% of tap-in/discharge permit applicants.	Ongoing beginning December 2004	MDOT Permitting Staff
2	Instruct MDOT staff to distribute materials as instructed in the revised Construction Permit Manual (CPM).	By June 1, 2005 [Completed]	
3	Review the adequacy of the procedure for distributing materials.	Every five years	

Activity E-5: Notify and Invite Public to Review and Comment on the Storm Water Management Plan (SWMP)

Objective: To obtain comments, statewide, from the public on the SWMP.

Description: MDOT followed state and federal public notice requirements when notifying the public that a storm water management plan must be implemented. MDOT specifically targeted local stream or watershed protection and environmental protection organizations and invited them to review and comment on the draft SWMP. The final SWMP is currently posted on the MDOT Public Storm Water Page.

THIS ACTIVITY IS COMPLETE AND WAS REPORTED ON IN THE ANNUAL REPORT FOR 7/1/03-12/31/04

Activity E-6: Determine Partnership Potential with MDEQ Statewide Public Education Program

Objective: To evaluate the potential for MDOT to educate the public through the MDEQ statewide public education program.

Description: As an alternative to performing a stand-alone education program for the traveling public, MDOT will evaluate providing financial support to a statewide campaign being developed by MDEQ. If MDOT decides not to support the MDEQ campaign, they would be required to perform their own program, in which case a program plan will be developed and submitted to MDEQ for approval.

Progress Report: No further information was developed during 2005 concerning this partnership. MDOT has pursued other avenues to promote storm water awareness with the traveling public including sharing educational materials with various watershed groups and municipalities.

Planned Activity: MDOT will continue to explore options for partnering with MDEQ on this public education activity. Until that issue is resolved, MDOT will develop and disseminate public education materials through channels currently available.

No.	Measurable Goals	Schedule	Responsible
1	Attend meetings with MDEQ statewide education advisory committee and MDEQ decision makers.	Once MDEQ finalizes their statewide public education program, MDOT will decide within 6 months whether or not to participate. A public education plan will be developed within 12 months if MDOT chooses not to participate.	Consultant and MDOT Storm water Program Manager
2	Obtain statewide campaign materials including cost to participate and evaluate the potential value of entering into a partnership with MDEQ.		
3	Develop participation agreement with MDEQ or develop an MDOT Public Education Plan (PEP).		

Activity T-1: Present Applicable Training to the Job-Related Public

Objective: Educate the Job-Related Public about the Storm Water Management Program.

Description: Use the four 15-minute MDOT storm water program training modules and other applicable trainings to train Lansing, Region/TSC staff, and contract agencies on storm water management.

- Module One: Introduction to Storm Water Management
- Module Two: Best Management Practices
- Module Three: Maintenance Considerations
- Module Four: Illicit Discharge & Maintenance

Progress Report: In order to assure the effectiveness of trainings given to the job-related public, planned revision of existing Phase I training modules has been replaced by a new approach to Job-Related Training.

As part of the new approach, general storm water education is being spread throughout the department by briefings and presentations at internal and external transportation-related conferences and workshops. See Appendix D for a table of training sessions, conferences, and workshops where storm water information was presented.

Other 2005 training included hazardous waste training in the University Region, statewide SESC training, and pesticide applicator training. Sensible salting training was conducted in several regions and was offered to contract counties upon request. SESC training was also offered to contract counties upon request.

In addition to training the job-related public, members of the MS4 Team participated in watershed group meetings and other relevant workshops.

Planned Activity: Training seminars are being developed as new procedures are finalized including an upcoming IDEP training in April 2006. The upcoming year will also target project design staff concerning incorporating and tracking post construction BMPs. Over the upcoming year, hazardous waste training will be provided in additional regions.

No.	Interim Milestones	Schedule	Responsible
1	Determine target audiences for the storm water modules. [Modified] <i>Determine target audiences annually for new procedure training.</i>	By June 1, 2005 [Modified] <i>On-going</i>	Implementation Teams as appropriate
2	Add storm water awareness training to existing MDOT training database (On-Track) to track individual employee training. Include training modules as part of select employee performance evaluations in 2006. [Modified] <i>Incorporate routine trainings into existing MDOT training database (On-Track) to track individual employee training.</i>	During 2006	E&O Team
3	Provide train-the-trainer preparation for presenters.	Ongoing	Implementation Teams as appropriate
4	Ensure modules are delivered during staff meetings and other meetings as warranted.	Ongoing	Implementation Teams as appropriate
5	Develop training evaluation surveys.	July 1, 2005 [Modified] <i>On-going</i>	E&O Team
No.	Measurable Goals	Schedule	Responsible
1	Review and update modules. [Modified] <i>Review and update routine trainings.</i>	Annually starting October 1, 2005 [Modified] <i>On-going</i>	E&O Team and MDOT Staff
2	Train Region/TSC Staff with storm water-related responsibilities on the four storm water modules. [Modified] <i>Train Region/TSC Staff with storm water-related responsibilities on storm water issues relevant to their job.</i>	By April 1, 2009	Implementation Teams as appropriate
3	Encourage trainees to complete training evaluation at the close of each training session.	Start Aug. 1, 2005 [Modified] <i>On-going</i>	Implementation Teams as appropriate
4	Provide modules to contract agencies and contracting associations with a request to use the modules. Provide information through the Michigan Local Technical Assistance Program (LTAP). [Modified] <i>Provide training and information regarding storm water issues to contract agencies and associations. Provide information through LTAP.</i>	By February 1, 2006	Maintenance Environmental Team (MET)
5	A general survey of storm water awareness will be conducted as described in Activity T-4. The survey will be designed to assess the educational program as a whole including the effectiveness of article publication.	Baseline Survey-2005 [Completed]	Storm Water Program Manager
6	A follow up survey will be conducted in 2008 to assess the need for program modifications.	Follow up Survey-2008	Storm Water Program Manager

Activity T-2: Certify MDOT's Staff for Pesticide/Fertilizer Application

Objective: To reduce pollution entering waters of the state, statewide, that originates from pesticide/fertilizer application.

Description: The existing training and certification program for pesticide/fertilizer applications will be evaluated and tracked to document performance and to prevent storm water pollution. Results will be used to recommend changes, if appropriate.

Progress Report: Pesticides are applied on MDOT right-of-way in accordance with Public Act 451, Regulations 636 and 637 and all other applicable state and federal regulations. These regulations require all applicators to be registered or certified to apply pesticides in the State of Michigan. MDOT requires all applicators to be certified if making roadside, guardrail, and brush pesticide applications on MDOT right-of-way. These applicators consist of MDOT, County and /or contractor personnel.

Pesticide training was conducted on April 19-20, 2005 with 54 attendees. There are 54 certified pesticide applicators currently within MDOT.

MDOT conducts a two-day training session each year to keep all certified MDOT applicators up to date on new regulations, procedures, and equipment and product changes. This training is approved and sanctioned as well as attended by the Michigan Department of Agriculture (MDA). MDA also issues recertification credits for this training, which are required to maintain/renew the applicators certification every three years.

Additionally, MDOT has compiled and produced an extensive pesticide applicator manual as a reference tool. This manual lists all pertinent information as it relates to MDOT spray operations/procedures (i.e. Laws/regulations, drift control plan, calibration, mixing/loading/storage operations, application rates/timing, limitations when working in protected areas/stream crossings/wildflower preservation areas, product labels and MSDS sheets, etc). Each certified applicator has a copy of the manual.

MDOT's policy has always been to take an integrated pest management (IPM) approach by considering all available tactics or strategies to manage pests. By doing so, MDOT achieves efficient and economical results with the least disruption to the environment. MDOT certified applicators are well trained and perform their spraying duties with the utmost sensitivity to the environment.

Fertilizer application is not currently regulated by State or Federal agencies. The application of fertilizer on MDOT right-of-way is typically done on construction projects. These fertilizer applications are completed in accordance with MDOT's 2003 Standard Specifications for Construction

manual, Section 816 and Section 917. There are very limited fertilizer applications made by MDOT Maintenance staff.

Planned Activity: MDOT will continue implementing their procedures for pesticide and fertilizer application. Pesticide training is scheduled for April 25-26, 2006.

No.	Measurable Goals	Schedule	Responsible
1	MDOT Staff applying pesticides will be trained and certified annually per Michigan Department of Agriculture requirements.	Ongoing	MDOT Maintenance Staff
2	MDOT Staff or Contract Agencies will follow MDOT's Standard Specifications for Construction, Sections 816 and 917 for fertilizer application practices.	Ongoing	MDOT Maintenance Staff
3	Evaluate application practices and pollution prevention measures and recommend and formalize any changes if appropriate.	Annually starting April 1, 2006	Maintenance Environmental Team, MDOT Maintenance Staff

Activity T-3: Train Staff Responsible for Administering Part 91 and those having Decision Making Authority for SESC Plan Development or Review, Inspections, or Enforcement; and Storm Water Operators as Required under Part 31

Objective: To reduce non-storm water discharges to the MEP to receiving water bodies.

Description: The existing MDEQ sponsored Soil Erosion and Sedimentation Control (SESC) training program will be attended by appropriate MDOT staff. Successful completion of the SESC training and certification of storm water operators will be documented.

Progress Report: Pursuant to Part 91 of Act 451, MDOT has established procedures for soil erosion and sedimentation control, as detailed in the MDOT SESC Manual. Targeted MDOT staff are trained and certified as required under Part 91. MDOT utilizes Certified Storm Water Operators as required under Part 31 of Act 451. Table 2-2 lists the number of staff in each region that are SESC trained and certified. Additionally, 171 MDOT staff are certified as Storm Water Operators.

Table 2-2 MDOT Staff SESC Trained and Certified

Region	Number of Staff SESC Certified
Lansing Central Office	6
Bay	15
Grand	16
Metro	40
North	19
Southwest	40
Superior	14
University	14

No.	Measurable Goals	Schedule	Responsible
1	MDOT Staff Responsible for Administering Part 91 and those having Decision Making Authority for SESC Plan Development or Review, Inspections, or Enforcement will receive NPDES training.	Ongoing	MDOT Maintenance Supervisors and Coordinators
2	MDOT Staff Responsible for Administering Part 91 and those having Decision Making Authority for SESC Plan Development or Review, Inspections, or Enforcement will be certified as Storm Water Operators as Required under Part 31.	By April 1, 2006	
3	Add NPDES training to MDOT Performance Excellence Division tracking system (On-Track).	By April 1, 2006 [Completed]	MDOT Storm Water Program Manager

Activity T-4: Survey MDOT Staff on Storm Water Knowledge

Objective: To determine the current level of storm water knowledge for a representative mix of administrative, technical, professional, and engineering staff to evaluate the effectiveness of the education program.

Progress Report: The general storm water awareness survey is intended to measure the effectiveness of MDOT's overall job-related public education efforts. The survey contains general storm water awareness questions as well as questions specific to design, maintenance, and construction staff. At the 2005 conferences and training sessions a baseline survey on storm water knowledge was administered. This survey will be administered again during the 2008 conferences and training sessions for comparison. Table 2-3 is a list of the number of surveys distributed and the number of surveys completed at MDOT conferences and trainings. The survey is being conducted so that a representative mix of administrative, technical, professional and engineering staff are surveyed, both in the central office and in the region offices.

Planned Activity: Results from the survey will determine where additional or revised education efforts will be concentrated. See Appendix E for a copy of the baseline storm water awareness survey.

Table 2-3 Baseline Storm Water Awareness Survey Distributed and Completed

Conference/Training Name	Conference/Training Date	No. Distributed	No. Completed
Bureau of Highway Conference	Jan. 25 – Jan. 26, 2005	100	53
American Council of Engineering Companies (ACEC) Partnering Conference	March 2, 2005	200	23
Construction & Technology Conference	March 9, 2005		95
Superior Region Delivery Day	March 22, 2005	70	36
University Region Contractor Day	April 13, 2005	15	4
Pesticide Conference	April 19-20, 2005	54	34
Bridge Conference	April 20-21, 2005	96	24
Maintenance Conference	Oct. 4- Oct. 6, 2005		48
Planning, Dev., Delivery, Multi-modal, Finance & Admin.	Nov. 17- Dec. 5, 2005		36

No.	Interim Milestones	Schedule	Responsible
1	Develop and prepare baseline survey for distribution.	Completed	Consultant and MS4 Team
No.	Measurable Goals	Schedule	Responsible
1	A general survey of storm water awareness will be conducted as described in Activity T-4. The survey will be designed to assess the educational program as a whole including the effectiveness of article publication.	Baseline Survey-2005 [Completed]	Storm Water Program Manager
2	A follow up survey will be conducted in 2008 to assess the need for program modifications.	Follow up Survey-2008	Storm Water Program Manager
3	Review the 2005 survey for baseline information.	By April 1, 2006 [Completed]	Consultant and MS4 Team
4	Review the 2008 survey to determine program effectiveness.	By April 1, 2009	MDOT Storm Water Program Manager
5	Increase the number of staff who are fully aware of MDOT's storm water program by 20% from 2005 to 2008.	2005 to 2008	N/A

Activity I-1: Submit and Implement Mapping Schedule for Outfalls (urbanized areas only)

Objective: To develop a mapping schedule and complete mapping of outfalls in MDOT right-of-way in urbanized areas, including MDOT roads crossing 305(b)-listed water bodies and other non-impaired water bodies.

Progress Report: The schedule for mapping outfalls in urbanized areas is located in the Storm Water Management Plan, Table 3-3. Mapping of an outfall is completed at the time of outfall screening. See Activity I-2 for a summary of outfall screenings conducted over the reporting period. Outfall maps are provided in Appendix B displaying the 313 outfalls that were investigated in 2005.

Planned Activity: Continue mapping outfalls in urbanized areas per SWMP.

No.	Interim Milestones	Schedule	Responsible
1	Complete maps of outfalls at stream crossings over or within 300 feet of impaired waters of the state within urbanized areas based on field inspection of top priority outfalls.	By April 1, 2009	Consultant And IDEP Team
2	Complete maps of outfalls at stream crossings over waters of the state within urbanized areas that are not field screened based on a GIS analysis.	By April 1, 2006 [Completed]	Consultant And IDEP Team
3	Develop process for notifying consultant of newly constructed outfalls.	By April 1, 2009	Consultant And IDEP Team
4	Link outfall screening/investigations to the asset management team's inventory database procedure.	By April 1, 2009	Consultant And IDEP Team
No.	Measurable Goals	Schedule	Responsible
1	Map outfalls in MDOT right-of-way in urbanized areas according to the schedule posted in the SWMP.	See Table 3-3 of the SWMP	Consultant And IDEP Team

Activity I-2: Perform Inventory and Dry Weather Screening on Outfalls

Objective: To identify illicit discharges and connections from the MDOT storm sewer system within 2000 Census urbanized areas according to the MDOT Illicit Discharge Elimination Program (IDEP) Fieldwork Plan for Permit Year 1.

Progress Report: In 2005 MDOT investigated and screened 313 outfalls located within 14 Michigan urbanized areas including: Ann Arbor, Bay City, Battle Creek, Benton Harbor, Detroit, Jackson, Holland, Kalamazoo, Monroe, Muskegon, Port Huron, Saginaw, South Bend, South Lyon-Howell-Brighton.

MDOT Phase II IDEP fieldwork in Detroit, Holland, Bay City, Battle Creek, Kalamazoo, Benton Harbor-St. Joseph, Saginaw, Muskegon, Ann Arbor, Brighton/Howell, Port Huron and Grand Rapids Urbanized Areas is ahead of the SWMP schedule. Appendix B includes maps of the outfalls investigated.

- 22 Crossings with no MDOT Outfalls present
- 313 Total Outfalls Identified
 - 284 Outfalls – Illicit Connection Ruled Out
 - 29 Outfalls – Pending - Require Further Investigation
 - 27 of the 29 - need to be tracked further upstream
 - 2 of the 29 - need to be televised

Planned Activity: Continue field work per SWMP.

No.	Measurable Goals	Schedule	Responsible
1	Follow illicit discharge procedure (Section 3.3) for 100% of illicit discharges found.	Beginning April 1, 2005	Consultant, IDEP Team, And Region IDEP Coordinators
2	Update MDEQ of the areas selected for dry weather screening.	Monthly starting November 1, 2004	Consultant, IDEP Team, And Region IDEP Coordinators

Activity I-3: Receiving and Notifying MDEQ of Illicit Discharges and Actions Taken

Objective: To receive reports and notify the MDEQ of illicit discharges, statewide, to the MDOT storm sewer system. To take action toward removing these discharges.

Description: Procedure for receiving and responding to reports of illicit discharges is established as part of Section 9.13 of the Construction Permit Manual. Training to effectively implement the procedure will be conducted. Procedure for receiving reports from construction site runoff is already in place as part of the SESC Manual.

Progress Report: Appendix F contains information pertaining to the status of reported illicit discharges/connections.

An IDEP Reporting database was developed using Microsoft Access software. The database will be housed at each of the regions and updated with reported IDEP issues. The database allows the user to input pertinent information regarding illicit discharges and helps track communications concerning the discharge.

Planned Activity: Training for the use of the database will be conducted at the spring region resource specialist conference in April 2006. New training material will be distributed to take the place of the Phase I IDEP module.

No.	Interim Milestone	Schedule	Responsible
1	Add illicit discharge reporting and notification information to Training Module Four. [Modified] <i>Develop illicit discharge reporting and notification training and provide to region IDEP coordinators.</i>	By June 1, 2005 [Modified] <i>By May 1, 2006</i>	E&O Team
No.	Measurable Goals	Schedule	Responsible
1	Train Maintenance and Construction staff with storm water responsibilities to follow the illicit discharge notification procedure.	By December 1, 2005 [Modified] <i>By December 1, 2006</i>	E&O Team and Region IDEP Coordinators
2	Add Illicit Discharge Notification training to existing MDOT employee training database (On-Track).	By April 1, 2006	Storm Water Program Manager

Activity I-4: Report Updates and Changes to Legal Authority Status

Objective: To regulate discharges to MDOT’s drainage system and require compliance with its permit.

Progress Report: No changes have been made to MDOT’s legal authority to regulate and/or prohibit direct discharges as set forth in Michigan statute MCL 247.651; MSA 9.1097(1). No changes have been made to Section 9.13, *Illicit Discharges into MDOT Storm Water Drainage Systems*, or Section 14.01, *Drainage Design for Accessing State Trunklines*, of the Construction Permit Manual.

Planned Activity: In 2006, Section 9.13 will be reviewed and updated by the IDEP Team.

No.	Measurable Goal	Schedule	Responsible
1	Assess legal authority annually to determine if any updates or changes are necessary.	Annually	Permits/ Utilities [Modified] <i>IDEP</i> <i>Workgroup</i>

Activity I-5: Map Known Outfalls (statewide)

Objective: To map known outfalls statewide based on existing survey information. To develop and implement a procedure to revise the known outfall maps annually.

Progress Report: Known outfalls include those outfalls defined by design-survey through state-plane coordinates, the Phase I outfalls and the Phase II investigated outfalls. See Appendix C for copies of the MDOT outfall maps which are arranged by county. Outfalls are defined in the BOH IM for outfall labeling included in Appendix G.

Planned Activity: Outfall map development will continue according to the schedule in the SWMP, Table 3-2 (shown below for reference). In addition, various MDOT areas are collaborating on possible uses for the collected outfall data.

Known Outfall Mapping Schedule (statewide)
(from Table 3-2 in the MDOT Storm Water Management Plan)

Activity	Schedule	Responsible Party
Compile survey data.	By August 1, 2005 [Completed]	MDOT Supervising Surveyor
Develop guideline to define outfalls.	By August 1, 2005 [Completed]	Consultant, Outfall Mapping Workgroup
Develop draft known outfall maps.	By December 31, 2005 [Completed]	Consultant
Provide draft known outfall maps to region storm water coordinators.	By February 1, 2006 [Modified] <i>By May 1, 2006</i>	Consultant
Review draft maps.	By May 1, 2006	Region Storm Water Coordinators and TSC/Region Staff
Revise maps.	By August 1, 2006	Consultant
Provide final known outfall maps to MS4 Committee.	By September 1, 2006	Consultant
Review final maps.	By December 1, 2006	MS4 Committee
Finalize Maps.	By March 1, 2007	Consultant
Develop and implement an internal process for making annual map revisions.	By April 1, 2007	Outfall Mapping Workgroup, Consultant
Update known outfall maps annually and include in the annual progress reports.	Annually starting April 1, 2008	Consultant, MS4 Committee

No.	Interim Milestones	Schedule	Responsible
1	Compile survey data.	By August 1, 2005 [Completed]	MDOT Design Surveys
2	Develop guideline to define outfalls.	By August 1, 2005 [Completed]	IDEP Team
No.	Measurable Goals	Schedule	Responsible
1	Map known outfalls in MDOT right-of-way statewide according to the schedule posted in the SWMP.	Starting April 1, 2005 (See Table 3-2 in the SWMP)	Consultant and IDEP
2	Develop and implement an internal process for making annual map revisions.	By April 1, 2007	Consultant and IDEP
3	Update known outfall maps annually and include in the annual progress report.	Annually starting April 1, 2008	Consultant and IDEP

Activity C-1: Maintenance Requirements for MDOT Permanent Best Management Practices (BMPs) (Post-Construction)

Objective: To protect receiving water quality statewide by developing and implementing maintenance requirements for permanent MDOT-approved BMPs.

Progress Report: Permanent BMPs, or Post-Construction BMPs, include structural BMPs and nonstructural BMPs. Permanent structural BMPs include items such as vortex separators and sediment basins. Permanent nonstructural BMPs are further broken down to operational and vegetative BMPs; operational BMPs include tasks such as street sweeping and dust control, while vegetative BMPs include vegetative swales and buffers at watercourses. See the MDOT Drainage Manual for more BMP descriptions.

MDOT's standard practice is to choose economical yet effective BMPs, if at all possible, which tend to be nonstructural. In special cases a structural BMP may be necessary which must be evaluated for maintenance requirements prior to installation of the BMP.

The following procedure was developed by the Post-Construction Storm Water Management Team for evaluating the maintenance of permanent structural BMPs that are new to MDOT.

1. The BMP manufacturer will recommend a maintenance schedule for the installed BMP.
2. The installation will be certified installed by the contractor.
3. Performance guidelines (operational and maintenance guidelines) will be tracked using MDOT's Maintenance Activity Reporting System (MARS) on the Maintenance Web site.
4. The contractor will provide an operational video.

Planned Activity: As permanent structural BMPs are installed, a "master list" will be kept by the Hydraulics Unit of the Design Support Area in the Lansing Central Office. The effectiveness of these structural BMPs will be evaluated to determine if they should continue to be used and the criteria for their selection.

No.	Interim Milestones	Schedule	Responsible
1	Review draft procedure for maintenance of permanent BMPs with appropriate MDOT entities for approval.	By June 1, 2006	Post-Construction Storm Water Management (Post-Const.) Team
2	Document maintenance procedures and issue staff guidance.	By August 1, 2006	
3	Review Maintenance Performance Guides and update accordingly.	By October 1, 2006	
4	Notify appropriate staff of changes to manuals.	By December 31, 2006	
No.	Measurable Goals	Schedule	Responsible
1	Develop and implement procedures for maintaining permanent BMPs not already having a maintenance procedure.	By December 31, 2006	Post-Const Team
2	Develop and implement a procedure for maintaining each <u>new</u> permanent BMP within one year of formal adoption of the new permanent BMP.	As needed beginning December 31, 2006	Post-Const Team
3	Maintain existing permanent BMPs according to existing MDOT procedures.	Ongoing	
4	Evaluate ways to improve maintenance practices in urbanized areas if control measures fail to adequately reduce discharge of pollution.	As needed beginning April 1, 2006	

Activity C-2: Identify and Coordinate with Metropolitan Planning Organizations (MPOs) Having Storm Water Quality Control Programs

Objective: To identify and coordinate, statewide, with MPOs having storm water quality control programs to properly handle storm water management issues during construction and maintenance activities.

Progress Report: In December of 2005, MDEQ provided an approved watershed group contact list. The list, included in Appendix H, includes watershed groups and MPOs throughout the state. On February 2, 2006, MDOT mailed a letter to the watershed groups requesting input on storm water BMPs for sensitive streams. The letter, provided in Appendix H, presented instructions on how to download MDOT's SWMP from MDOT's storm water Web site and requested recommendations, based on watershed initiatives, regarding structural controls such as first flush basins, infiltration trenches, vegetated buffers, and discharge goals for water quality parameters. Watershed stakeholder groups will have the opportunity to comment on Environmental Assessments and Environmental Impact Statements through the project public notice process or Context Sensitive Solutions (CSS) initiative. MDOT pending projects can be reviewed in MDOT's Five Year Plan available on the public Web site. With the letter, MDOT also included information about public education materials. MPOs can use education material available on the Web site.

MDOT is currently involved with some watershed groups, including attending Rouge River Storm Water Advisory Groups and other local watershed group meetings on an as needed basis. These meetings are listed in Appendix D (same as training appendix).

In 2004 and 2005, MDOT (North Region) participated in multiple meetings regarding excessive trash emanating from M-37 to the Baldwin River in the Village of Baldwin. Meeting attendants included MDOT, MDEQ, MDNR, and the Pere Marquette Watershed Council. MDOT installed a water quality control vortex separator to treat MDOT storm water runoff. Negotiations are still ongoing with the Village of Baldwin about how their portion of the discharge will be handled.

Planned Activities: MDOT will consider watershed and environmental group input during early coordination of MDOT transportation projects.

No.	Measurable Goals	Schedule	Responsible
1	Notify recognized watershed and environmental groups that MDOT is accepting input on special BMP requirements for sensitive streams or portions of streams.	By June 1, 2005 [Letter mailed February 2006]	Consultant, Storm Water Program Manager
2	Consider watershed and environmental group input during early coordination of MDOT transportation projects.	Ongoing beginning April 1, 2006	MDOT Region Planning and Design Staff

Activity C-3: Procedure to Select, Apply, and Maintain Permanent Best Management Practices (BMPs) for Storm Water Management Activities (Post-Construction)

Objective: To develop a procedure for selecting, applying, and maintaining permanent BMPs for selected MDOT projects statewide.

Progress Report: Permanent BMPs, or Post-Construction BMPs, include structural BMPs and nonstructural BMPs. Permanent structural BMPs include items such as vortex separators and sediment basins. Permanent nonstructural BMPs are further broken down to operational and vegetative BMPs; operational BMPs include tasks such as street sweeping and dust control, while vegetative BMPs include vegetative swales and buffers at watercourses. See the MDOT Drainage Manual for more BMP descriptions.

A process for selecting, designing, and maintaining post-construction BMPs has been discussed at several implementation team meetings and has been informally drafted. As discussed in Activity C-1, MDOT routinely selects economical and effective BMPs, such as vegetative swales, in their projects whenever possible. The early coordination process with the MDEQ may trigger the need for selecting more advanced storm water BMPs in some cases. The need and funding for a permanent BMP is established in the environmental documentation for larger jobs. For smaller jobs, the BMP necessity and location will be determined in the scoping and early coordination process. The actual BMP is selected by the designer with input from construction and maintenance and funded with project funds. Non-standard BMPs will be added to the project plans by use of a special provision that outlines the structural, installation and maintenance details. Maintenance will be informed early in the process of new BMP installations so specialized maintenance can be budgeted, if necessary.

Planned Activity: Once the procedure for selecting, applying, and maintaining permanent BMPs is determined and reviewed by the MDEQ, a Bureau of Highway Instructional Memorandum (BOH IM) will be drafted to formalize the procedure. The BOH IM will then be reviewed by the regions. The final procedure will then be communicated to the MDOT designers and consultants.

The qualified product list (QPL) committee will be reestablished for review of possible BMPs for projects. This list is used by construction to determine what products can be used on MDOT projects.

No.	Interim Milestones	Schedule	Responsible
1	Evaluate procedures for selecting, applying, and maintaining permanent BMPs. Approved MDOT permanent BMPs are located in the Drainage Manual. Develop a procedure to add new BMPs to the MDOT-approved BMP list.	By December 31, 2005 [Completed]	Post-Const Team
2	Review options with appropriate MDOT entities including development of a funding source based on research from other states.		
3	Make a recommendation for approval.		
4	Lay out a detailed framework for the approved procedure.	By August 1, 2006	
5	Document procedure and issue staff guidance.		
6	Update the existing process in the Drainage Manual and tie the process into the scope verification procedure.	December 31, 2006	
7	Notify appropriate staff of changes to manuals.		
No.	Measurable Goals	Schedule	Responsible
1	Develop procedure for selecting, applying, and maintaining permanent BMPs.	By December 31, 2005 [Completed]	Post-Const Team
2	All projects will be evaluated for permanent storm water BMP inclusion during scoping/early design.	Beginning December 31, 2006	MDOT Design Staff

Activity C-4: Procedure to Work With MDEQ for Early Coordination on Initial Design Projects

Objective: To have early coordination with MDEQ for input on BMP type and placement of select projects statewide.

Progress Report: MDOT held three early coordination meetings in 2005. The MDNR and MDEQ - Land and Water Management Division were included in these discussions.

A final draft Memorandum of Understanding (MOU) was sent to the MDEQ-Water Bureau for review and approval in October of 2005. The MOU consists of two primary triggers (new outfall and/or increased discharge rate/volume) and two secondary triggers (cold water fisheries and TMDL waterbodies). About 30 projects per year are anticipated to be sent to the MDEQ based on past reviews by the Environmental Section.

MDOT also has an MOU with the MDNR which addresses early coordination triggers from multiple groups within the MDNR.

With these MOUs in place, the agreement process between MDOT, MDEQ, and MDNR would begin 2 to 5 years prior to the start of a project. A form would be included in the project application stating that environmental issues from the MDNR, MDEQ, and MDOT have been resolved. This process will allow all three parties to comment.

Issues identified during the MOU development process included:

- Regulatory agencies overlap some areas of natural resource protection, such as protection of cold water streams. Both MDNR-Fisheries and MDEQ-Water Bureau desire early input on projects, but in some cases, their recommendations are conflicting or duplicative. The Department of Information Technology and the Environmental Section at MDOT are developing a Web site to facilitate early coordination that would allow MDOT to post project information and allow the regulatory agencies to view comments. Project information will be posted and the site will track how many projects were sent for review and how many occurrences or comments were received.
- Identifying sites where structural controls are needed early enough to allocate funding is a challenge. Training for design staff and growing familiarity with the storm water regulations should address this issue over time.

MDOT invited MDEQ-Water Bureau to participate in the regulatory agency meeting in November of 2005. MDOT presented status information to state and federal regulatory agencies for “major projects” (i.e. those requiring Environmental Assessments or Environmental Impact Statements).

A list of watershed contacts has been incorporated into the MDOT document distribution list for major action documents and public notice.

MDOT held a meeting with MDNR and MDEQ Grant Funding staff in August of 2005 to discuss ways to dovetail grant funding sources. MDOT became a member of MDEQ Grant Funding Team and shared a list of water quality enhancement projects with the regulatory agencies.

MDOT has begun reviewing a broad range of enhancement projects for possible inclusion of innovative water quality BMPs. Enhancement grant applicants are encouraged to seek MDEQ input on proposed BMPs.

Five major action documents were distributed to MDEQ – Land and Water Management Division; MDNR, US Fish and Wildlife and EPA in 2005. Each document required a public hearing be held and notice of the documents availability for review be posted in local papers. Comments were received from regulatory agencies and environmental groups (no watershed groups specifically).

Planned Activity:

Steps have been initiated to share aquatic biosurvey assessment data collected by MDOT during Environmental Assessments with MDEQ-Water Bureau. The process will be discussed in more detail at future coordination meetings. MDEQ is evaluating the feasibility of updating EPA STORET database with data collected by MDOT consultants. QA/QC is an issue and the data might be better assimilated into MDEQ's volunteer monitoring database.

No.	Interim Milestones	Schedule	Responsible
1	Develop draft procedure for early coordination on initial design projects.	By April 1, 2005	Public Involvement and Participation (PIP) Team
2	Meet with MDEQ to further evaluate the early coordination procedure.	[Completed]	
3	Review options with appropriate MDOT and MDEQ entities and make a recommendation for approval. Update manuals and issue staff guidance accordingly.	By August 1, 2005 [Completed]	
No.	Measurable Goals	Schedule	Responsible
1	Develop procedure for coordinating with MDEQ on initial design projects.	By August 1, 2005 [Completed]	PIP Team
2	Train design staff with storm water responsibilities.	By April 1, 2006	Region Permitting, Planning, and TSC Design Staff
3	All projects discharging to coldwater fisheries, designated Natural Rivers, and other water bodies as identified in the early coordination Memorandum of Understanding with MDEQ Water Bureau will seek involvement from appropriate regulatory agencies in the early coordination process by April 1, 2006.	By April 1, 2006	Cost/Sched. Engineer, Region Permitting, Planning, and TSC Design Staff

Activity C-5: Review Projects with Storm Water Discharges to Water Bodies with a Promulgated Total Maximum Daily Load (TMDL)

Objective: To develop a procedure to review projects with storm water discharges to water bodies with a promulgated TMDL, and to implement storm water controls statewide to meet responsibilities established by TMDLs to the MEP.

Progress Report: There are two levels of environmental review conducted on MDOT projects. Major action projects are documented by Environmental Assessments or Environmental Impact Studies. Projects which do not have the potential for significant adverse impact to the environment are considered categorical exclusions. MDOT did not review any major action projects with discharge to water bodies with sediment TMDLs. MDOT reviewed five categorical exclusion projects with potential impacts (increase flow or new outfalls) to water bodies with sediment TMDLs. These projects were located in Metro and University Regions with drainage being directed to the Grand River and the Ecorse and Rouge Rivers. All projects in University Region were determined to not need structural BMPs due to the drainage course being routed through more than 200 feet of vegetative swale. Open drainage was incorporated into all but one Metro Region project, which was for a new bridge with several new site gradient outfall structures. Drainage was conveyed to the Rouge River via less than 200 feet of vegetated swale, but installation of structural control was determined to not be feasible due to lack of right-of-way and because flow rates were not increasing and conveyance was sheet flow via a very well vegetated floodplain.

In addition to TMDL water bodies, MDOT reviewed more than 500 projects specifically for potential post construction water quality impacts during its routine environmental clearance. As part of this process, MDOT has included or has plans to include the following project mitigation:

- Blue Water Bridge Plaza Study – Design of this new international crossing plaza will include provisions for addressing discharges of oily water. This study also included aquatic biosurveys of Black River and Stocks Creek. This data was sent to MDEQ-Water Bureau for their consideration.
- Fort Street Bridge (Detroit) – Plans to replace this bascule bridge include provisions for establishing vegetated buffer strips along the Detroit River.
- M-32 through Mio – Construction on the revised drainage course is due to start this summer. Drainage which was previously routed to the AuSable River will be routed through an existing wetland complex.

Planned Activity: MDOT will continue to conduct environmental reviews per their standard procedure and to track post construction storm water control installation. .

No.	Interim Milestones	Schedule	Responsible
1	Post interactive mapping system on the MDOT Storm Water Web Site showing MDOT trunklines crossing 305(b)-listed water bodies. <i>[Modified] A mapping system will be posted on the Storm Water Web site with the new maps showing outfalls investigated in 2005 as part of dry weather screening.</i>	By June 1, 2005 [Modified] By <i>June 1, 2006</i>	Consultant
2	Evaluate various options to review projects discharging to TMDL water bodies.	By October 1, 2004 [Completed]	PIP Team
3	Review options with appropriate MDOT entities.		
4	Make a recommendation for approval.		
5	Lay out a detailed framework for the approved procedure.	By June 1, 2006	
6	Document procedure and issue staff guidance.		
7	Review manuals and update accordingly.	February 1, 2007	
8	Notify appropriate staff of changes to manuals.		
No.	Measurable Goals	Schedule	Responsible
1	Review all new projects that discharge to waters of the state with a promulgated TMDL.	By April 1, 2005 [Completed]	MDOT Planning, Design, and TSC Staff

Activity C-6: Implement Procedures to Select, Apply, and Maintain Permanent Best Management Practices for Storm Water Management Activities (Post-Construction)

Objective: To protect receiving water quality by implementing post-construction BMPs statewide.

Progress Report: Permanent BMPs, or Post-Construction BMPs, include structural BMPs and nonstructural BMPs. Permanent structural BMPs include items such as vortex separators and sediment basins. Permanent nonstructural BMPs are further broken down to operational and vegetative BMPs; operational BMPs include tasks such as street sweeping and dust control, while vegetative BMPs include vegetative swales and buffers at watercourses. See the MDOT Drainage Manual for more BMP descriptions.

As discussed in Activity C-1, MDOT routinely selects economical and effective BMPs, such as vegetative swales, in their projects whenever possible. Permanent BMP selection, application, and maintenance procedures will be implemented beginning April 1, 2007 following procedural development as a result of Activity C-3. The Post Construction Storm Water Management Practices Team is working towards training the Region's Transportation Service Center engineers to track constructed permanent BMPs such as detention basins. Permanent BMPs selected for earth-disturbing projects will be tracked in a database, and pollutant discharge reductions based on theoretical BMP performance will be reported.

Although procedures are still being developed, BMPs are selected, applied, and maintained when possible. The following projects include permanent structural BMPs:

- Discharge from M-37 to the Baldwin River (MDOT North Region) - The drainage system conveys both MDOT and Baldwin Village water. The Pere Marquette Watershed Council, MDNR, MDEQ, MDOT TSC staff were involved in this project. In 2004, MDOT installed a vortex separator as a water quality control measure to treat MDOT storm water runoff. Negotiations are still ongoing with the Village of Baldwin about how their portion of the discharge will be handled.
- Ford Dam, Alberta Pond at US-41, in Covington Township, Baraga County – The Ford Dam has a drainage area of 1.9 square miles. The dam has two culverts serving as an outlet for the Alberta Pond. One of these culverts is not functioning. MDOT has abandoning both culverts, adding a riser with a drop inlet, and placing a 72-inch corrugated steel pipe. With the proposed improvements to the dam, the MDEQ has estimated the flood frequency discharges to be 220 cubic feet per second for the 100 year flood and 240 cubic feet per second for the 200 year flood. Analyses show that the dam will pass both flood frequency discharges with four foot freeboard in the 100 year flood and three foot freeboard in the 200 year flood.

- Water quality basin in Grand Rapids at the corner of 36 Street and Interstate Highway I-96 – The basin is designed to capture the first flush, or 1/2 inch of rainfall over the impervious area that drains to the basin.

Planned Activity: MDOT will continue developing the procedure for selecting, applying, and maintaining permanent best management practices for storm water management activities.

No.	Interim Milestones	Schedule	Responsible
1	Upon having a BMP selection, application, and maintenance procedure in place (see Activity C-3), add procedural information to training modules.	By August 1, 2007	MDOT Planning, Design Staff
No.	Measurable Goals	Schedule	Responsible
1	Train design staff with storm water responsibilities on applying the permanent BMP procedure.	By April 1, 2007	MDOT Planning, Design Staff
2	Implement procedure to select, apply, and maintain permanent BMPs.	Ongoing beginning April 1, 2007	MDOT Planning, Design, and Maintenance Staff
3	Develop a procedure to estimate pollutant discharge reduction based on theoretical BMP performance.	By December 1, 2007	Post-Const. Team
4	BMPs will be modified, replaced, or enhanced if they are not properly installed, maintained, and/or applied for pollutant control.	As needed beginning April 1, 2007	MDOT Planning, Design, and Maintenance Staff

Activity C-7: Internal Quality Assurance/Quality Control (QA/QC) Protocol for Construction Storm Water Control

Objective: To improve the effectiveness of temporary BMPs statewide through internal QA/QC for construction storm water control.

Description: Development of the QA/QC protocol is underway and will be submitted to EC for approval.

Progress Report: The Revised Soil Erosion and Sedimentation Control (SESC) Manual is being reviewed by MDEQ.

Resident engineers at the region level are reviewing the Draft QA/QC Plan for SESC (known as the “SESC Program Review”). Following the region review, the draft plan will go to the Environmental Committee (EC) and/or the Engineering Operations Committee (EOC) for approval. The SESC Program Review will be distributed as a Bureau of Highway Instructional Memorandum (BOH IM). The program reviews will be conducted annually in each region and semi-annually at each Transportation Service Center. A review checklist form has been drafted.

Planned Activity: A new special provision has been drafted concerning contractor penalties during construction activities. The special provision is to be discussed at the Construction Conference scheduled March 7-9, 2006 and will be piloted in 20 projects statewide. Also at the Construction Conference, MDOT will discuss storm water management updates. MDOT’s consultant team, Tetra Tech, will prepare a draft SESC Presentation for the Construction Conference.

No.	Interim Milestones	Schedule	Responsible
1	Develop draft QA/QC protocol.	By December 31, 2005 [Completed]	SESC Team, Design, Planning and Maintenance
No.	Measurable Goals	Schedule	Responsible
1	Develop a QA/QC protocol for construction storm water control.	May 1, 2006	SESC Team
2	Inspect all sites disturbing at least one acre.	Per the SESC Manual	Part 91 Inspector
3	Follow up on all deficiencies noted in site inspections within the specified time frame.		Part 91 Inspector and Project Engineer

Activity C-8: Periodically Update Drainage Manual

Objective: To update MDOT’s policies and procedures for the design of drainage facilities by reviewing and revising MDOT’s Drainage Manual as needed to include the latest details of the storm water management program.

Progress Report: The MDOT Drainage Manual was updated within the last year. The MDOT Drainage Manual describes policies and procedures that apply to the design of drainage facilities and storm water management plan BMPs. The manual provides a tool for MDOT designers and is a required resource for design consultants and contractors. The BMPs referenced in the Drainage Manual provide guidance on the design and implementation of the BMPs.

Planned Activity: Copies of all revisions will be sent to people on the distribution list, including MDEQ, in the spring of 2006.

No.	Measurable Goals	Schedule	Responsible
1	Assess the need to update the Drainage Manual.	Annually beginning April 1, 2005	MDOT Design (Hydraulics) Staff
2	Update the Drainage Manual. Changes to manual must be approved by the Engineering Operations Committee (EOC).	As needed.	
3	Notify appropriate staff of changes to the manual.		

Activity C-9: Documentation and Tracking of Road Maintenance Activities

Objective: MDOT roadways will be operated and maintained, and storage facilities will be constructed to reduce pollutants washing into surface waters statewide.

Progress Report: MDOT's Maintenance Environmental Team is involved with maintenance activities that help prevent storm water pollution, such as street sweeping, catch basin maintenance, ditch clean out, culvert and underdrain maintenance, Adopt-a-Highway litter collection, mowing, brush control, and bank stabilization. MDOT also tracks salt usage. Depending on the location, local public transportation agencies working under contract for MDOT around the state will inspect BMPs on a regular basis.

Street sweeping is conducted 1 to 3 times per year depending on the area (urban, rural). There is an emphasis on conducting street sweeping in the spring following the snow melt. Catch basin cleaning, approach sweeping, and curb sweeping conducted by MDOT crews is tracked using the Maintenance Activity Reporting System (MARS). The Program Cost Accounting (PCA) details and costs are tabulated below. Street sweeping and flushing and culvert/underdrain maintenance activities for the counties are tracked using Local Agency Payment System (LAPS) and is tabulated below.

The culvert/underdrain maintenance activities include repair, removal, or replacement of catch basins, pipe culverts, pipe boxes, pipe headwalls, and underdrain tiles to culverts in a clean and serviceable condition. \$1,907,522 was spent for 9,544 hours of roadside and general maintenance activities conducted by MDOT, including cleaning 10,316 catch basins, sweeping 7,112 approaches, and sweeping 898 curb miles. \$6,184,129 was spent for approximately 82,750 hours of activities conducted by local agencies, including street sweeping and flushing of approximately 21,387 lane miles and maintaining approximately 8,273 miles of culverts and underdrains. See Table 2-4 and Table 2-5 for MDOT and Local Agency summaries for street sweeping and catch basin cleaning, respectively.

Table 2-4 MDOT Roadside and General Maintenance Activity PCA Report Summary

Region	Activity		# Hours	Cost	# Units	Cost/unit
Superior	Roadside Maintenance	Catch Basin Cleanout	1,947	\$94,094	7,362	\$13
	General Maintenance	Approach Sweeping	80	\$8,612	175	\$49
		Curb Sweeping	1,006	\$50,064	195 curb miles	\$257
		Total	3,033	\$152,770	-	-
North	Roadside Maintenance	Catch Basin Cleanout	1,009	\$77,327	2,223	\$35
	General Maintenance	Approach Sweeping	399	\$31,667	751	\$42
		Curb Sweeping	19	\$8,858	Not available	Not available
		Total	1,427	\$117,852	-	-
Grand	This region does not have any direct forces garages. Maintenance is done by local agencies.					
Bay	Roadside Maintenance	Catch Basin Cleanout	16	\$1,425	Not available	Not available
	General Maintenance	Approach Sweeping	285	\$17,339	40	\$433
		Curb Sweeping	1,785	\$162,243	490.5 curb miles	\$331
		Total	2,086	\$181,007	-	-
Southwest	Roadside Maintenance	Catch Basin Cleanout	300	\$1,130,409	730	\$1,549
	General Maintenance	Approach Sweeping	803	\$32,819	2,507	\$13
		Curb Sweeping	26	\$81,974	204 curb miles	\$402
		Total	1,129	\$1,245,202	-	-
University	Roadside Maintenance	Catch Basin Cleanout	8	\$1,413	1	\$1,413
	General Maintenance	Approach Sweeping	1,517	\$56,482	3,639	\$16
		Curb Sweeping	51	\$45,159	8 curb miles	\$5,645
		Total	1,576	\$103,054	-	-
Metro	Roadside Maintenance	Catch Basin Cleanout	51	\$97,530	Not available	Not available
	General Maintenance	Approach Sweeping	0	\$0	0	-
		Curb Sweeping	243	\$10,106	Not available	Not available
		Total	294	\$107,636	-	-
Total	Roadside Maintenance	Catch Basin Cleanout	3,331	\$1,402,199	10,316	\$136
	General Maintenance	Approach Sweeping	3,084	\$146,919	7,112	\$21
		Curb Sweeping	3,129	\$358,404	897.5 curb miles	\$399
		Total	9,544	\$1,907,522	-	-

Table 2-5 Local Agency Payment System (LAPS) Report Summary for Sweeping and Flushing and Culvert/Underdrain Maintenance Activities

Region	Activity	Cost	Miles	<i>Approximate Total Hours*</i>
Superior	Street Sweeping and Flushing	\$250,388	-	-
	Culvert/Underdrain Maintenance	\$145,758	-	-
	Total	\$396,144	3,500	4,700
North	Street Sweeping and Flushing	\$190,062	-	-
	Culvert/Underdrain Maintenance	\$117,027	-	-
	Total	\$307,087	4,200	4,050
Grand	Street Sweeping and Flushing	\$397,410	-	-
	Culvert/Underdrain Maintenance	\$19,241	-	-
	Total	\$416,653	3,370	1,250
Bay	Street Sweeping and Flushing	\$389,876	-	-
	Culvert/Underdrain Maintenance	\$71,791	-	-
	Total	\$461,667	3,580	4,400
Southwest	Street Sweeping and Flushing	\$142,330	-	-
	Culvert/Underdrain Maintenance	\$55,556	-	-
	Total	\$197,886	1,050	2,000
University	Street Sweeping and Flushing	\$406,987	-	-
	Culvert/Underdrain Maintenance	\$51,147	-	-
	Total	\$458,134	2,880	5,150
Metro	Street Sweeping and Flushing	\$3,946,558	-	-
	Culvert/Underdrain Maintenance	\$0	-	-
	Total	\$3,946,558	4,260	61,200
Total	Street Sweeping and Flushing	\$5,703,274	-	-
	Culvert/Underdrain Maintenance	\$480,855	-	-
	Total	\$6,184,129	22,840	82,750

*Wayne County and many cities do not report labor hours in LAPS. The number of hours listed in italics is based on the average "cost per hour" obtained from local agencies which had reported the number of their hours spent on the activity.

Groups involved in the Adopt-A-Highway Program strive to conduct 3 pick-ups per year. Other groups involved in litter pick-up include Youth Corp, prison inmates and MDOT maintenance crews. Additionally, mowing contracts require contractors to pick-up litter before mowing. It is difficult to get an accurate quantity of trash pick-up as landfill receipts are not necessary for the Adopt-A-Highway program.

MDOT tracks biweekly salt and sand usage from MDOT crews and the counties. A salt storage program is also in affect to assist contract agencies in updating their salt sheds. Salt and sand usage on state trunklines from October 2004 through April 2005 are show in Table 2-6. MDOT applied 699,795 tons of salt and 122,778 tons of sand over 30,268 lane miles. These numbers are tracked over time but it is difficult to determine a maximum allowable usage due to varied weather conditions and road conditions. MDOT is however concerned about salt and sand usage and does test new de-icing technologies to reduce salt usage such as pre-wetting, and infrared sensors.

Planned Activity: MDOT will continue to investigate methods of incorporating more tracking mechanisms, such as estimated solids removal, into contracts for county and municipal agencies. In the interim, MDOT will track labor hours and expenditures.

Table 2-6 MDOT Salt and Sand Usage

Region	Lane Miles	Salt Tonnage	Salt Tonnage per Mile	Sand Tonnage	Sand Tonnage per Mile
Superior	4,206	102,565	24.4	55,359	13.2
North	4,966	114,206	23.0	40,605	8.2
Grand	3,426	82,360	24.0	12,834	3.7
Bay	4,344	82,477	19.0	58	0.01
Southwest	4,011	69,417	17.3	461	0.1
University	4,682	84,084	18.0	13,461	2.9
Metro	4,634	164,684	35.5	0	0
Total	30,268	699,795	23.1	122,778	4.1

No.	Measurable Goals	Schedule	Responsible
1	Investigate how to track contracted road maintenance activities using a pilot-study with a county. In the interim, discuss maintenance activities in terms of hours of labor.	By April 1, 2007	Pollution Prevention & Good Housekeeping (PP&GH) Team, Maintenance Staff, Contract Agency
2	20,000 hours of street sweeping will be completed annually.	Annually	Maintenance Staff, Contract Agency
3	23,000 hours of catch basin cleaning will be completed annually.	Annually	Maintenance Staff, Contract Agency

Activity C-10: Procedure for Outfall Labeling

Objective: MDOT will provide permanent identification for all outfall structures installed after April 1, 2006 statewide.

Progress Report: In March of 2005, MDOT issued a Bureau of Highways Instructional Memorandum (BOH IM) and Special Provision for Labeling Storm Water Outfalls. A copy of the memorandum is provided in Appendix G. The memorandum included a special provision to be incorporated into all proposals that include items of work for culvert end sections, headwalls or other locations such as wing walls, retaining walls, etc. where storm water will discharge directly from the MDOT drainage system to the waters of the state.

Over 30 outfalls installed in 2005 were labeled as shown in Table 2-7. This represents all of the outfalls that were required to be labeled according to the BOH IM.

Planned Activity: MDOT plans to field review the outfall marking to ensure the method is adequate to provide permanent identification. The special provision will be revised if necessary. MDOT will continue labeling new outfalls as defined in the BOH IM.

Table 2-7 List of Outfalls Labeled During 2005 Construction Season

Project	Outfall Location
1. I-96 under Beck Road (new SPUI interchange in west Oakland County) [CS 63022/JN 60082A]	East Shaw Creek. Redirected outfall. New 60-inch located at Beck Road. Station 172+85, left side
	West Shaw Creek. Redirected outfall. Extended 36-inch cross culvert. Station 444+00, left side
	North side of freeway drainage toward existing wetland with outfall of new 18-inch culvert in close proximity at Station 55+90, left side, Relocated 12-Mile Road
2.M-203 [CS 31031/JN 81340A]	Station 163+00, offset 57 feet right
3. Near B05 of 09033 [CS 09033/JN 53356]	Station 422+95, offset 69 feet right, 24-inch RCP
	Station 421+95, offset 50 feet right, 30-inch RCP
4. M-33 from north of M-72 north to north of McKinley Road [CS 68012/JN 59634A]	M-33, Station 19+75, offset 65 feet right, 30-inch Class A
	AuSable River Access Road, Station 502+90, offset 40 feet right, 30-inch Class A
5. US-24 [CS 58052/JN 53210A]	US-24 over the Wenrick & Cousino Drain: 4-foot by 6-foot box culvert
	US-24 over Muddy Creek: 6-foot by 8-foot box culvert
	US-24 over N. Branch of Muddy Creek: 4-foot by 6-foot box culvert
	US-24 over Pike Swale: 4-foot by 6-foot box culvert
6. M-40 from Hamilton to Holland [CS 03072/JN 53362A]	Station 936+35.5, 59.3 feet right 42-inch RCP
	Station 999+85.63, 110.98 feet left, 48-inch RCP
7. M-82 at 64th Street [CS 62022 JN 78471A]	57 feet north of 64th Street centerline, 42-inch RCP
8. M-29 in Marine City [CS 77052/JN 50531A]	Station 84+96, 26 feet right, 24-inch RCP

Project	Outfall Location
9. I-96 from M-11 (28 th Street) east to east of Thornapple River Drive [CS 41024/JN 45271A]	Station 743+97, eastbound, right, headwall
	Station 753+50, eastbound, right, 18 inch
	Station 756+40, eastbound, right, 15-inch
	Station 759+00, eastbound, right, 24-inch
	Station 762+25, eastbound, right side, 15-inch
	Station 766+75, eastbound, right side, 18-inch
	Station 769+10, eastbound, right side, 48-inch
	Station 772+00, eastbound, right side, 24-inch
	Station 777+75, eastbound, right side, 24-inch
	Station 791+75, eastbound, right side, 36-inch
	Station 791+70, eastbound, right side, headwall
	Station 791+80, eastbound, right side, headwall
	Station 799+05, eastbound, left side, headwall
	Station 799+50, eastbound, left side, headwall
	Station 799+60, eastbound, left side, headwall
	Station 801+90, eastbound, left side, 24-inch
	Station 802+05, eastbound, left side, headwall
	Station 803+35, eastbound, left side, headwall
	Station 802+55, eastbound, left side, headwall
	Station 820+20, eastbound, right side, headwall
	Station 822+00, eastbound, right side, headwall
	Station 305+10, 36 th Street ramp c right side, headwall
	Station 416+10, 36 th Street ramp d right side, headwall
Station 417+75, 36 th Street ramp d right side, headwall	
Station 24+75, southbound 36 th Street connector right side, 24-inch	
10. M-37, north of 76 th Street, Village of Caledonia South to 222 feet south of Kent/Barry County line [Contract 41031-75083, Projects 75083A and 79568A]	Emmons Lake Drain. Station 286+85, left, 60-inch RCP along south side of 100 th Street
	Emmons Lake Drain. Station 295+90, left, 60-inch +/- 850 feet north of 100 th Street
	Unnamed watercourse. Station 454+10, left, 6-foot by 6-foot box culvert +/- 75 feet north of 76 th Street

No.	Interim Milestones	Schedule	Responsible
1	Assess various procedures for labeling outfalls.	By January 31, 2005 [Completed]	SESC Team
2	Review procedures with appropriate MDOT entities and make a recommendation for approval.		
3	Develop a special provision for labeling.	By April 1, 2005 [Completed]	
4	Document procedure and issue staff guidance.		
5	Review and update manuals accordingly.		
6	Notify appropriate staff of changes to manuals.		
No.	Measurable Goals	Schedule	Responsible
1	Develop procedure for labeling all new outfall structures statewide.	By April 1, 2005 [Completed]	SESC Team
2	All new outfall structures will be labeled and maintained statewide.	Starting April 1, 2006 [Completed]	MDOT C & T and Maintenance Staff

Activity C-11: Review Flow Control Structures

Objective: MDOT will ensure that new flow control structures in urbanized areas assess impacts on water quality and whenever possible will examine existing flow control structures for inclusion of water quality BMPs to the MEP.

Progress Report: All new flow control structures are being reviewed for inclusion of water quality BMPs on a project by project basis as part of environmental clearance. Maintenance requirements for existing water quality controls having a water quality benefit will be developed to the maximum extent practicable. A database is being created of existing permanent storm water BMPs located across the state. It is planned that this database be updated as new BMPs are installed.

Planned Activity: With development of the procedure to select, apply, and maintain best management practices for storm water management activities (Activity C-3), design staff will be trained to track these structures and evaluate them for water quality benefit.

No.	Measurable Goals	Schedule	Responsible
1	All new flow control structures will be reviewed for inclusion of water quality BMPs.	Beginning August 1, 2005	MDOT Planning Specialists and Post- Const team
2	All new flow control structures will be evaluated for water quality benefit based on the theoretical pollutant removal rate.	Beginning April 1, 2006	
3	Maintenance requirements for existing water quality controls having a water quality benefit will be developed to the maximum extent practicable.	By December 31, 2006	
4	Applicable MDOT Staff will be trained to review new and existing flow control structures.	By April 1, 2007	

Activity C-12: Audit the Pollution Incident Prevention Plan (PIPP) Requirements

Objective: To assure that vehicle maintenance activities statewide do not pollute storm water runoff to the maximum extent practicable.

Progress Report: MDOT ensures that proper precautions are taken so that vehicle maintenance activities do not impact storm water runoff quality. PIPPs have been prepared and implemented for all MDOT facilities that conduct vehicle maintenance activities and/or provide storage.

Level 1 PIPP audits at maintenance facilities are completed every year. PIPP audits were conducted during the summer of 2005 within each MDOT region. Phase I, II, and III PIPP audits were previously conducted throughout the regions. Facility environmental reviews are conducted annually by several regions during the annual “Pumpkin Parade”. These reviews focus on general housekeeping items. Most counties have PIPPs on file as they are required to have one to qualify for environmental funds.

No major spills at MDOT facilities occurred during this reporting period. MDOT will look at pollution prevention practices on construction sites such as project clean-up and bridge painting solvents. The charge of reviewing pollution prevention at construction sites will likely be handled by the Maintenance Environmental Team (MET) or the Construction Environmental Team (CET).

Planned Activity: The Pollution Prevention and Good Housekeeping Team will review PIPP audit comments and determine how to best address any problems. MDOT will begin conducting more in-depth PIPP audits every three years beginning April 1, 2006. PIPP audits will assist in determining where training should be focused and if revisions to the PIPP are needed.

No.	Measurable Goals	Schedule	Responsible
1	Conduct an audit of the PIPP requirements every three years.	Beginning April 1, 2006	Region Resource Analyst/Specialist, Region /TSC Storm Water Coordinator, or Safety & Homeland Security, PP&GH Team
2	Follow-up on any delinquent plan requirements and revise appropriately.	As needed.	
3	Formally accept the changes made to the PIPP.		

Activity A-1: Program Assessment and Reporting

- Objective:** To assess and report on the status of the MDOT Storm Water Management Plan (SWMP) on an annual basis through compiling measurable goal data, perform program assessment, review auditing activities, and prepare annual report.
- Description:** Conduct a yearly program assessment of the MDOT Storm Water Program and conduct annual reporting.
- Progress Report:** MDOT is reviewing and revising their current activity tracking systems so that information is more accessible for the SWMP reporting process. Tracking systems for various activities are described as follows.
- The Illicit Discharge Elimination Program (IDEP) database will be housed at each region. Each region will be responsible for tracking illicit discharge issues and sending the report to MDOT's consultant, Tetra Tech, each January to be included in the annual report.
- Tap-in/discharge permits that are part of a construction permit are now being tracked. Previously, only individual tap-in/discharge permits were tracked.
- A BMP Database has been created that helps track information and maintenance pertaining to MDOT's permanent flow control structures, such as detention ponds.
- Catch basin cleaning, approach sweeping, and curb sweeping conducted by MDOT crews is tracked using the Maintenance Activity Reporting System (MARS). Associated costs are tracked with MDOT's Program Cost Accounting (PCA).
- Sweeping and flushing and culvert/underdrain maintenance activities for the counties are tracked using Local Agency Payment System (LAPS)
- Planned Activity:** An early coordination tracking system is being developed for better coordination between MDOT, the MDEQ, and the MDNR. Methods and opportunities for better tracking are continually being discussed.

No.	Interim Milestones	Schedule	Responsible
1	Develop tracking protocol for entire plan to combine tracking and reporting for each activity. Coordinate with existing databases.	By April 1, 2006	Implementation Teams as appropriate
2	Review and test tracking program.	By April 1, 2007	
3	Compile data and draft the annual report.	Annually beginning February 1, 2005.	Consultant
4	Review the overall status of implementation of the SWMP to assure compliance with its requirements.		MDOT Storm Water Program Manager
5	Review interim milestones and measurable goals for applicability. Revise measurable goals and milestones as needed.		Implementation Teams, Storm Water Program Manager
6	Review annual budget and revise fiscal analysis if necessary.		
7	Review the annual progress report. Provide comments and assure its accuracy.		Implementation Teams. Storm Water Program Manager
8	Conduct the final review of the annual report and issue approval for submitting to MDEQ		MDOT EC
No.	Measurable Goals	Schedule	Responsible
1	Submit annual reports to MDEQ.	By April 1 of each year	Storm Water Program Mgr.
2	All tracking information for the previous year will be complete and accessible for inclusion in the annual report.	By January 2 of each year.	Consultant, Storm Water Program Mgr.