

Appendix A

Storm Water Management Plan Activity Sheets

Appendix A contains all of the activity sheets from Chapter 3 of the Storm Water Management Plan. Each activity sheet denotes modifications to the activity’s interim milestones and measurable goals and also indicates which interim milestones and measurable goals have been completed or implemented as shown with gray shading.

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Activity E-2: Publish Articles in MDOT Publications

Affected Party: Job-Related Public

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. 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.

Annual Reporting: Track topics and number of articles circulated.

Related Activities: Activity A-1 - Program Assessment and Reporting
 Activity E-1 - Lansing Information Center
 Activity E-3 - MDOT Public Web Site
 Activity T-4 - Storm Water Knowledge Survey

Permit Requirement: Part I.B.1.a(1): Educate the job-related public of hazards associated with improper disposal of waste/illicit discharges.
 Part I.B.1.a(3): Educate the job-related public of watershed stewardship and implement program.

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 [On-going]	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 [On-going]	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

Affected Party: Job-Related Public and Traveling Public

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 public information Web site about the Phase II storm water program. The Web site provides general information about watershed stewardship practices as well as links to pertinent storm water-related materials. This information will be maintained and monitored to report Web site usage.

Annual Reporting: Track internal and external Web site hits and the number of SWMP document downloads on the MDOT Storm Water Public Web Site.

Related Activities: Activity A-1 - Program Assessment and Reporting
 Activity E-1 - Lansing Information Center
 Activity E-2 - Publish Articles in MDOT Publications
 Activity T-4 - Storm Water Knowledge Survey

Permit Requirement: Part I.B.1.a(1): Educate the job-related public of hazards associated with improper disposal of waste/illicit discharges.
 Part I.B.1.a(3): Educate the job-related public of watershed stewardship and implement program.
 Part I.B.6: Ensure MDOT employees maintain and follow proper pollution prevention controls.

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 [On-going]	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. <i>[This is turning out to be difficult as it is highly competitive to be allotted space on the homepage.]</i>	By April 1, 2006 [When possible]	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 [Completed]	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

Affected Party: Applicants obtaining a Discharge/Tap-In Permit and Region/TSC Staff involved with reviewing and approving permits.

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.

Annual Reporting: Track quantity of permit applications/educational materials distributed.

Related Activities: Activity A-1 - Program Assessment and Reporting
Activity I-4 - Updates to Legal Authority

Permit Requirement: Part I.B.1.c: Provide pollutant prevention information to applicants that apply to tap into the MDOT drainage system.
Part I.B.1.c: Train MDOT employees to provide pollution prevention education during application process.

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

- Affected Party:** Traveling Public
- 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.
- Annual Reporting:** MDOT will decide whether or not to participate in statewide program.
- Related Activities:** Activity A-1 - Program Assessment and Reporting
- Permit Requirement:** Part I.B.1.b: If the MDEQ develops a statewide public education program, MDOT may either seek a partnership agreement with the MDEQ for implementation of Part I.B.1.b. of this Permit, or develop and implement a program to increase awareness and seek positive public behavior.

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 Modules to the Job-Related Public

Target Audience:	Lansing and Region/TSC Staff and contract agencies
Objective:	Educate the Job-Related Public about the Storm Water Management Program.
Description:	Use the four 15 minute MDOT storm water program training modules to train Lansing and Region/TSC staff and contract agencies. <ul style="list-style-type: none">• Module One: Introduction to SW Management• Module Two: Best Management Practices• Module Three: Maintenance Considerations• Module Four: Illicit Discharge & Maintenance
Annual Reporting:	Track training attendance. Track contract agencies receiving modules.
Related Activities:	Activity T-4 - storm water survey; Activity I-3 - illicit discharge notification; Activity T-3 - Part 91 and Part 31 training
Permit Requirement:	Part I.B.1.a(1), Part I.B.1.a(2), Part I.B.1.a(3), Part I.B.4.b(2), Part I.B.6

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 [On-going]	E&O Team
3	Provide train-the-trainer preparation for presenters.	On-going	Implementation Teams as appropriate
4	Ensure modules are delivered during staff meetings and other meetings as warranted.	On-going	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 [On-going]	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*

Target Audience: MDOT Maintenance Staff and Contract Agencies

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.

Annual Reporting:

- Track the number of individuals attending annual pesticide training.
- Track number of MDOT personnel certified as a pesticide applicator.
- Summarize evaluation and review of programs, policies, procedures and information.
- Report changes to fertilizer specifications.

Related Activities: Activity A-1 - Program Assessment and Reporting

Permit Requirement: Part I.B.6.f: Minimize the discharge of pollutants related to storage, handling and use of herbicides/fertilizers. Provide employee training for herbicides/fertilizers to protect water quality.

No.	Measurable Goals	Schedule	Responsible
1	MDOT Staff applying pesticides will be trained and certified annually per Michigan Department of Agriculture requirements.	On-going	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.	On-going	MDOT Maintenance Staff
3	Evaluate application practices and pollution prevention measures and recommend and formalize any changes if appropriate.	Annually starting April 1, 2006 [On-going]	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

Affected Party: MDOT Maintenance Supervisors and Coordinators and Construction Supervisors

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 maintenance staff. Successful completion of the training and certification of storm water operators will be documented.

Annual Reporting: Total number of staff trained and certified for compliance with Part 31 and Part 91 requirements.

Related Activities: Activity A-1 - Program Assessment and Reporting
Activity C-7 - QA/QC Protocol for Construction Storm Water Control

Permit Requirement: Part I.B.5.a: MDOT shall meet the following requirements on MDOT construction sites statewide, but may rely on the MDOT SESC Plan and Michigan's Permit by Rule to the extent that those controls meet the requirements: 1) Implement soil erosion and sedimentation controls, 2) Control demolition and construction waste materials at construction sites, 3) Consider potential water quality impacts during road construction plan reviews, and 4) Inspect sites to assure that pollution control measures are appropriate and functional.

Part I.B.6: The program shall include employee and contractor training to prevent and reduce storm water pollution through proper implementation and maintenance of BMPs. The program may be developed and implemented using BMP guidance and training materials that are available from federal, state or local agencies.

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.	On-going	MDOT Maintenance Supervisors and Coordinators and Construction Supervisors
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 [On-going]	
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

Affected Party: Representative MDOT Staff

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

Annual Reporting:

- Report the survey results.
- Report the results of subsequent survey and compare.

Related Activities:

Activity A-1 - Program Assessment and Reporting
 Activity E-1 - Lansing Information Center
 Activity E-2 - Publish Articles in MDOT Publications
 Activity E-3 - MDOT Public Web Site
 Activity T-1 - Training Modules for Job-Related Public

Permit Requirement: Part I.B: The MAXIMUM EXTENT PRACTICABLE requirement shall be met by implementation of BMPs to comply with minimum measures for which the permittee has authority, implementation of BMPs to comply with minimum levels of storm water pollution control established in TMDLs if applicable, and a demonstration of effectiveness or environmental benefit for each BMP.

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)*

Affected Party: MDOT Staff and Contractor/Consultant

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.

Annual Reporting: Track completed maps.

Related Activities: Activity A-1 - Program Assessment and Reporting
Activity I-5 - Map Known Outfalls
Activity C-10 - Procedure for Outfall Labeling

Permit Requirement: Part I.B.3.a: Within one year, submit schedule for maps of known outfalls.
Maps shall be developed for outfalls at roadway crossings no later than expiration of Permit.

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

Affected Party: Consultant, MDOT Region Storm Water Coordinators, and Storm Water Program Manager

Objective: To identify illicit discharges and connections from the MDOT storm sewer system within 2000 Census urbanized areas as prioritized in the IDEP Plan.

Annual Reporting:

- Number and location of confirmed outfalls.
- Total number of suspected illicit connections/discharges identified.
- Number and location of manholes tested for each suspected illicit connection/discharge.
- Results of sample analysis.
- Description and number of illicit connections/discharges verified.
- Estimated amount and type of pollutant removed.

Related Activities:

Activity A-1 - Program Assessment and Reporting
 Activity I-1 - Submit and Implement Mapping Schedule for Outfalls
 Activity I-4 - Updates to Legal Authority
 Activity I-5 - Map Known Outfalls

Permit Requirement:

Part I.B.3.b: Outfalls prioritized and top priority outfalls (305(b)-listed water bodies impaired by untreated sewage, bacteria, pathogens, nutrient enrichment, nuisance plant growth, nuisance algal growth, low dissolved oxygen, sediments, oil or grease, fish kills, and fish or macroinvertebrate communities rated poor) shall be screened for dry weather discharges.

Part I.B.3.b: Use screening results to identify and eliminate illicit discharges as expeditiously as practicable.

Part I.B.3.b: Illicit connections that cannot be disconnected immediately shall be identified in annual report and eliminated as soon as possible.

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

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

Affected Party: MDOT Region Storm Water Coordinators, TSC Managers, and Storm Water Program Manager

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.

Annual Reporting:

- Track the number of reports received and the follow-up actions taken.
- Track the number of illicit connections/discharges identified and removed.

Related Activities: Activity A-1 - Program Assessment and Reporting
 Activity T-1 - Present Training Modules to Region/TSC staff
 Activity I-4 - Updates to Legal Authority

Permit Requirement: Part I.B.3.c: Provide a system to accept and respond statewide to reports of illicit discharges received from job-related public.

No.	Interim Milestone	Schedule	Responsible
1	Develop illicit discharge reporting and notification training and provide to region IDEP coordinators.	By May 1, 2006 [Completed]	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 [On-going]	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 [Completed]	Storm Water Program Manager

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

- Affected Parties:** Landowners discharging or planning to discharge to MDOT's drainage system, MDOT Permit & Utilities Staff
- Objective:** To regulate discharges to MDOT's drainage system and require compliance with its permit.
- Annual Reporting:** Report changes to legal authority by revising Sections 9.13 and 14.01 of the Construction Permit Manual.
- Related Activities:** Activity A-1 - Program Assessment and Reporting
Activity I-2 - Perform Inventory and Dry Weather Screening on Outfalls
Activity I-3 - Receiving and Notifying MDEQ of Illicit Discharges and Actions Taken
- Permit Requirement:** Part 1.B.3.d(1): Legal authority to regulate the contribution of pollutants to the drainage system.
Part 1.B.3.d(2): Legal authority to regulate the rate of water inflow.
Part 1.B.3.d(3): Legal authority to prohibit illicit connections/discharges into drainage system.
Part 1.B.3.d(4): Legal authority requiring compliance with conditions in Permit.

No.	Measurable Goal	Schedule	Responsible
1	Assess legal authority annually to determine if any updates or changes are necessary.	Annually [On-going]	IDEP Team

Activity I-5: Map Known Outfalls (statewide)

- Affected Parties:** MDOT Region Storm Water Coordinators, Planning and Design, Construction & Technology Staff, and Asset Management
- Objective:** To map known outfalls statewide based on existing survey information. To develop and implement a procedure to revise the known outfall maps annually.
- Annual Reporting:** Document the procedure for making annual map revisions, and track updated outfalls.
- Related Activities:** Activity A-1 - Program Assessment and Reporting
Activity I-2 - Perform Inventory and Dry Weather Screening on Outfalls
Activity C-10 - Procedure for Outfall Labeling
- Permit Requirement:** Part 1.B.3.a: Within one year following the effective date of this Permit, the permittee shall submit a schedule for providing maps showing the location of known outfalls.

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> [Completed]	Consultant
Review draft maps.	By May 1, 2006 [Completed]	Region Storm Water Coordinators and TSC/Region Staff
Revise maps.	By August 1, 2006 [Completed]	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 [Completed]	Consultant
Develop and implement an internal process for making annual map revisions.	<i>By April 1, 2009</i> [Modified]	IDEP Team, Consultant
Update known outfall maps annually and include in the annual progress reports.	Annually starting April 1, 2008 [On-going]	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) [Completed]	Consultant and IDEP
2	Develop and implement an internal process for making annual map revisions. [<i>Working on various avenues of tracking and reporting which requires more time.</i>]	<i>By April 1, 2009</i> [Modified]	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)

Affected Party: MDOT Maintenance, Maintenance Activity Reporting System (MARS) Team, Delivery, and Design Staff

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

Annual Reporting: Track BMP maintenance activities using MARS.

Related Activities: Activity A-1 - Program Assessment and Reporting
Activity C-6: Implement Procedures to Select and Apply Best Management Practices for Storm Water Management Activities (Post-Construction)

Permit Requirement: Part I.B.4.b(2): Requirements for long-term operation and maintenance of BMPs.
Part I.B.6.a(1): Statewide routine maintenance for structural controls.
Part I.B.6.a(2): In urbanized areas, cleaning schedules may need to be enhanced if control measures fail to adequately reduce the discharge of pollutants to or from the drainage system.

No.	Interim Milestones	Schedule	Responsible
1	Review draft procedure for maintenance of permanent BMPs with appropriate MDOT entities for approval.	By July 1, 2007 [Completed]	Post-Construction Storm Water Management (Post-Const.) Team And Maintenance Environmental Team (MET)
2	Document maintenance procedures and issue staff guidance.	By Sept. 1, 2007 [Completed]	
3	Review Maintenance Performance Guides and update accordingly.	By October 1, 2006 [Modified] <i>By Dec. 31, 2008</i>	
4	Notify appropriate staff of changes to manuals.	By December 31, 2006 [Modified] <i>By Feb. 1, 2009</i>	
No.	Measurable Goals	Schedule	Responsible
1	Develop and implement procedures for maintaining permanent BMPs not already having a maintenance procedure.	By Feb. 1, 2008 [Completed]	Post-Const Team And MET
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 Feb. 1, 2008 On-going	
3	Maintain existing permanent BMPs according to existing MDOT procedures.	On-going	
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.*

Affected Parties: MDOT Staff and MPOs

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.

Annual Reporting:

- Track letters distributed to the planning organizations.
- Track letters distributed to watershed and environmental groups soliciting area of concern comments.
- Track the major action environmental documents (environmental assessments and environmental impact statements) distributed to watershed groups for their comments.
- Track responses from watershed and environmental groups concerning areas of concern.
- Track any early coordination meetings held with watershed and environmental groups including whether groups attend a public meeting or comment on one of the major action documents.

Related Activities: Activity A-1 - Program Assessment and Reporting
 Activity C-4 - MDEQ Early Coordination
 Activity C-5 - Storm Water Discharges to TMDL Water Bodies

Permit Requirement: Part I.B: Within areas with watershed management plans, reducing discharge to the maximum extent practicable shall include implementation of BMPs to comply with watershed goals.
 Part I.B.2.c: Where MPOs exist, MDOT shall identify and cooperate with local storm water master planning processes and the MPO. MDOT shall implement storm water controls as necessary to cooperate with local storm water master plans.
 Part I.B.4.a: Program to coordinate with local planning efforts that conform with the cooperative planning requirements of 23 CFR 450.210 and 23 CFR 450.312 and which considers potential environmental effects of impervious surfaces.
 Part I.B.4.a: MDOT shall make information available to local planning efforts.

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.	Letter mailed February 2006	Consultant, Storm Water Program Manager
2	Consider watershed and environmental group input during early coordination of MDOT transportation projects through Context Sensitive Solutions.	On-going 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)

Affected Party: MDOT Maintenance, Planning and Design, Traffic & Safety, Maintenance Environmental Team (MET), and MS4 Team

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

Annual Reporting: Track permanent BMP installation and maintenance.

Related Activities: Activity A-1 - Program Assessment and Reporting
 Activity C-4 - MDEQ Early Coordination
 Activity C-5 - Storm Water Discharges to TMDL Water Bodies
 Activity C-6 - Select, Apply, Maintain Permanent BMPs
 Activity C-8 - Update Drainage Manual

Permit Requirement: Part I.B.4.b(1): Requirements for implementation of BMPs.
 PartI.B.4.b(2): Requirements for long-term operation and maintenance of BMPs.

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 July 1, 2007 [Completed]	
5	Document procedure and issue staff guidance.	By Dec. 31, 2007 [Completed]	
6	Update the existing process in the Drainage Manual and tie the process into the scope verification procedure.		
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.	By Dec. 31, 2007 [Completed]	MDOT Design Staff

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

Affected Parties: MDOT Development, Design, Real Estate, Environmental, and Maintenance Staff and MDEQ Staff

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

Annual Reporting:

- Track projects where early coordination was sought with MDEQ and other regulatory agencies.
- Track projects where MDEQ provided timely recommendations.
- Document actions taken based on comments received from MDEQ.
- Document the results of the annual meeting with MDEQ Water Bureau on early coordination issues.

Related Activities: Activity A-1 - Program Assessment and Reporting; Activity C-2 - Coordinate with MPOs; Activity C-5 - Storm Water Discharges to TMDL Water Bodies; Activity C-8 - Update Drainage Manual

Permit Requirement: Part I.B.4.c: Allow MDEQ review of preliminary construction plans and provide input on placement of drainage and BMPs.

No.	Interim Milestones	Schedule	Responsible
1	Develop draft procedure for early coordination on initial design projects.	By April 1, 2005 [Completed]	Public Involvement and Participation (PIP) Implementation Team
2	Meet with MDEQ to further evaluate the early coordination procedure.		
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 August 1, 2007 [Completed]	Region Permitting, Planning, and TSC Design Staff
3	All projects triggering early coordination with the MDEQ-Water Bureau as described in the Early Coordination for Post-Construction BMPs Procedure will seek involvement from appropriate regulatory agencies.	By 2007 Scoping Process [On-going]	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)*

- Affected Party:** MDOT Maintenance, Planning and Design, Traffic & Safety, Maintenance Environmental Team (MET), MS4 Team and TSC Staff
- 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.
- Annual Reporting:** Track location of projects, location of TMDL waters and how MDOT complied with TMDL requirements.
- Related Activities:** Activity A-1 - Program Assessment and Reporting; Activity C-2 - Coordinate with MPOs; Activity C-4 - MDEQ Early Coordination; Activity C-8 - Update Drainage Manual
- Permit Requirement:** Part I.B. paragraph 2: If a water body has a TMDL, the appropriate water quality requirements for that pollutant may be defined in the TMDL. In that event, MEP includes, but is not limited to, the development, implementation and enforcement of storm water controls designed to meet the permittee's responsibilities established by the TMDL. Any reduction achieved through implementation of controls in accordance with Part I.B. of this permit shall count toward compliance with the waste load allocation of the TMDL.

No.	Interim Milestones	Schedule	Responsible
1	A mapping system will be posted on the Storm Water Web site with the new maps showing outfalls investigated as part of dry weather screening.	By June 1, 2006 [Completed]	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)*

Affected Parties: MDOT Maintenance, Traffic & Safety, Planning, Design, and Construction Staff and Contractors

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

Annual Reporting: Track the permanent BMPs selected for earth-disturbing projects using existing databases. Report pollutant discharge reduction based on theoretical BMP performance.

Related Activities: Activity A-1 - Program Assessment and Reporting
 Activity T-1 - Present Training Modules to Region/TSC Staff
 Activity C-1 - Maintenance Requirements for MDOT Permanent Best Management Practices (BMPs)
 Activity C-3 - Select, Apply, and Maintain Permanent BMPs
 Activity C-8 - Update Drainage Manual

Permit Requirement: Part I.B.4.b(1): Requirements for implementation of BMPs.
 Part I.B.4.b(2): Requirements for long-term operation and maintenance of BMPs.
 Part I.B.6.a(2): In urbanized areas, structural controls may need to be enhanced if control measures fail to adequately reduce the discharge of pollutants to or from the drainage system.

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 [Modified] By August 1, 2008	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 [Modified] By December 1, 2008	MDOT Planning, Design Staff
2	Implement procedure to select, apply, and maintain permanent BMPs.	On-going beginning April 1, 2007 [Modified] By Jan. 1, 2009	MDOT Planning, Design, and Maintenance Staff
3	Develop a procedure to estimate pollutant discharge reduction based on theoretical BMP performance. [<i>This is to be implemented as part of the Post Construction BMP Base-Line Inspections.</i>]	By December 1, 2007 On-going	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 Jan. 1, 2008 On-going	MDOT Planning, Design, and Maintenance Staff

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

Affected Parties: MDOT Construction & Technology (C&T), Planning, Design, and Maintenance Supervisors

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.

Annual Reporting: Track number and result of internal reviews and actions taken per procedure.

Related Activities: Activity A-1 - Program Assessment and Reporting
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

Permit Requirement: Part I.B.5.a: MDOT shall meet the following requirements on MDOT construction sites statewide, but may rely on their SESC Plan and the State of Michigan's Permit by Rule to the extent that those controls meet the requirements: 1) Implement soil erosion and sedimentation controls. 2) Control demolition and construction waste materials, concrete truck washout, chemicals, litter, and sanitary waste at construction sites that may cause adverse impacts to water quality. 3) Consider potential water quality impacts during road construction plan reviews. 4) Inspect sites to assure pollution control measures are appropriate.

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 [Completed]	SESC Team
2	Inspect all sites disturbing at least one acre.	Per the SESC Manual [On-going]	Part 91 Inspector
3	Follow up on all deficiencies noted in site inspections within the specified time frame.	[On-going]	Part 91 Inspector and Engineer

Activity C-8: Periodically Update Drainage Manual

Affected Party: MDOT Design, Construction & Technology and Region/TSC Staff

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.

Annual Reporting: Track changes made to the Drainage Manual

Related Activity: Activity A-1 - Program Assessment and Reporting
 Activity C-4 - MDEQ Early Coordination
 Activity C-5 - Storm Water Discharges to TMDL Water Bodies
 Activity C-6 - Implement Procedures to Select, Apply, Maintain Permanent BMPs
 Activity C-3 - Procedure to Select, Apply, Maintain Permanent BMPs

Permit Requirement: Part I.B.6.a(1): Routine maintenance on structural controls.
 Part I.B.5.a(2): Control demolition and construction waste materials, concrete truck washout, chemicals, litter, and sanitary waste at construction sites that may cause adverse impacts to water quality.
 Part I.B.4.c: Develop and implement a process for review of BMPs.

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

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

Affected Party: MDOT Maintenance Staff, MARS Team, Maintenance Environmental Team (MET), and Contract Agencies

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

Annual Reporting:

- Estimate actual quantity of salt used for de-icing versus maximum calculated amount based on Maintenance Performance Guide 14100.
- Track hours of street sweeping and catch basin cleaning conducted.

Related Activity: Activity A-1 - Program Assessment and Reporting
Activity C-1 - Maintenance Requirements for MDOT Permanent BMPs

Permit Requirement: Part I.B.6: Ensure MDOT employees maintain and follow proper pollution prevention controls.
Part I.B.6.a(1): Describe and implement procedures for proper disposal of operation and maintenance waste.
Part I.B.6.b(1): Construct, operate, and maintain surfaces statewide to reduce discharge of pollutants into system. Salt and sand applied for improved traction shall be prevented from entering receiving streams to the maximum extent practicable.
Part I.B.6.b(1) Good Housekeeping implemented at salt and sand storage facilities.
Part I.B.6.b(2): Maintain existing street cleaning and catch basin maintenance activities.

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 [Modified] By Dec. 1, 2008	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

Affected Parties: MDOT Construction & Technology and Maintenance Staff

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

Annual Reporting:

- Track the location and size of outfalls not labeled between April 1, 2005 and April 1, 2006.
- Track the location and size of outfalls labeled.

Related Activity: Activity A-1 - Program Assessment and Reporting
 Activity T-1 - Training Modules to the Job-Related Public
 Activity I-5 - Map Known Outfalls
 Activity C-8 - Update Drainage Manual

Permit Requirement: Part I.B.6.c: Provide permanent identification of outfalls installed after April 1, 2005 that discharge directly into waters of the state. The primary operator of the drainage system shall be readily identifiable by observation of the outfall.

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

Affected Party: MDOT Design and Planning Staff

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.

Description: MDOT is currently reviewing all new flow control structures as part of environmental clearance and will continue to do so. Existing flow control structures will be examined whenever possible.

Annual Reporting: Number of flow control structures reviewed and water quality benefits gained based on the theoretical pollutant removal rates.

Related Activity: Activity A-1 - Program Assessment and Reporting
Activity C-3 - Procedure to Select, Apply, and Maintain Permanent BMPs for Storm Water Management Activities (Post-Construction)

Permit Requirement: Part I.B.4.c: Develop and implement a process for review of BMPs.
Part I.B.6.d: Ensure new storm water flow management projects assess impacts of water quality on the receiving water and, whenever possible, examine existing projects for incorporation of water quality protection.

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 [Modified] <i>December 31, 2008</i>	
3	Maintenance requirements for existing water quality controls having a water quality benefit will be developed to the maximum extent practicable.	December 31, 2007 [On-going]	
4	Applicable MDOT Staff will be trained to review new and existing flow control structures.	By April 1, 2007 [Modified] <i>December 31, 2008</i>	

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

Affected Party: MDOT Maintenance Staff, Region Resource Analyst/Specialist, Region/TSC Storm Water Coordinator, and Safety & Homeland Security

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

Description: Internal auditing of the PIPP is already conducted and implemented.

Annual Reporting:

- Summary of PIPP audits
- Document new programs, policies, procedures and information.

Related Activity: Activity A-1 - Program Assessment and Reporting
Activity T-1 - Training Modules to the Job-Related Public
Activity C-1 - Maintenance Requirements for MDOT Permanent BMPs

Permit Requirement: Part 1.B.6.: Ensure MDOT employees maintain and follow proper pollution prevention controls.
Part 1.B.6.a(1): Routine maintenance on structural controls.
Part 1.B.6.a(2): If necessary, enhance structural controls and cleaning schedules for adequate pollutant control.
Part 1.B.6.e.: Assure vehicle maintenance activities do not pollute storm water runoff.

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

Activity A-1: Program Assessment and Reporting

Affected Party: MDOT employees involved with the storm water program.

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.

Annual Reporting:

- Track and document SWMP activities.
- Complete annual progress report.
- Conduct evaluation of program and make changes as needed.

Related Activities: All Activities

Permit Requirement: Part I.C: Program Assessment and Reporting

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 [On-going]	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 [On-going]	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 [On-going]	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. [On-going]	Consultant, Storm Water Program Mgr.