DEQ CMI Required Elements (NPS)	EPA Minimum Elements (319)	Michigan's Phase II Minimum Requirements	Content requirements meeting all 3
1. The *geographic scope* of the watershed. • Watershed boundaries are appropriate. • Plan includes a watershed map that clearly shows the watershed boundaries and the location of surface waters. • Plan provides a description of the watershed, including such information as land use information, predominant soil types, significant natural features, and hydrology information.		*The boundaries of the watershed plan are required to be identified as an element of the Application and included in the Certificate of Coverage (the boundary must make hydrologic sense and should not be based on political boundaries).*	• Watershed boundaries must be hydrologically based and delineated on a map. • The watershed description should include such information as: o Hydrology o Geology o Ecology o Land Use.
2. The *designated uses and desired uses* of the watershed. • Plan includes the designated uses that are being met. • Plan includes a list of desired uses, including restoring and/or protecting designated uses.		• An assessment of the nature and status of the watershed ecosystem to the extent necessary to achieve the purpose of the Watershed Management Plan (WMP).	• Include designated and desired uses of the watershed.
3. The *water quality threats and/or impairments* in the watershed. • Plan identifies the water quality threats. • Plan identifies the water quality impairments, if applicable, including the designated uses that are not being met.		• *The purpose of the WMP shall be to resolve water quality concerns including those related to a TMDL, which are caused by wet-weather discharges from separate storm water drainage systems.* • *An Illicit Discharge (to storm sewers) Elimination Plan is required and*	• Include water quality impairments and threats.

4. The known or suspected cause of each threat or impaired use, including specific *pollutants*. 5. The *sources of the pollutants* causing the impairments or threats and those that are critical to control in order to meet water quality standards or other water quality goals. • The plan includes the sources of pollutants. • The method used to inventory sources is included. • An inventory has been completed to identify priority areas. • The sources have been prioritized. • The prioritization method is included.	a. An identification of the causes and sources or groups of similar sources that will need to be controlled to achieve the load reductions estimated in this watershed-based plan.	*specifically targets this source.*	• Include the sources and causes of the threats and impairments including a quantification or estimate of the magnitude of each source or cause and a prioritization of the sources and causes. • *DEQ includes designation of critical areas tied to sources – EPA includes designation of critical areas tied to BMPs. These are equivalent requirements and described below.*
6. A clear statement of the *water quality improvement or protection goals* of the watershed plan. • Plan identifies water quality improvement goals, including restoring designated uses. AND/OR • Plan identifies water quality protection goals, including protecting designated uses.	b. An estimate of the load reductions expected for the management measures described in element (c) below.	• Long-term goals for the watershed (which shall include both protection of designated uses and attaining compliance with any TMDL established within the watershed).	• Plan identifies water quality improvement goals, including restoring designated uses. AND/OR • Plan identifies water quality protection goals, including protecting designated uses. • Plan identifies an estimate of the load reduction needed to attain the water quality goal. AND/OR • Plan identifies an estimate of the maximum allowable load to protect water quality.

7. The *tasks* that need to be completed to prevent or control the critical sources of pollution or address causes of impairment, including as appropriate: • Plan identifies specific tasks to accomplish the identified goals, the responsible party and the anticipated products. • Tasks include one or more of the following: o Best management practices needed, including physical improvements. o Revisions needed or proposed to local zoning ordinances and other land use management tools. o Information and educational activities. o Activities needed to institutionalize watershed protection.	c. A description of the NPS management measures that will need to be implemented to achieve the load reductions estimated in element (b) above, and an identification (using a map or a description) of the critical areas in which those measures will be needed to implement this plan.	• Determination of the actions needed to achieve the short-term objects • Determination of the actions needed to achieve the long-term goals	A description of the tasks and activities that will need to be implemented to achieve the water quality goals and tied to the estimated loads. The description must describe the critical area for each task and activity.
8. Estimated *cost* of implementation activities, by category (such as BMP implementation, land use management activities, information/education activities, etc.).	d. An estimate of the amounts of technical and financial assistance needed, associated costs, and/or the sources and authorities that will be relied upon, to implement this plan.	• Assessment of the benefits and costs of the actions (a cost/benefit analysis is not required).	• An estimate by category of the amounts of technical and financial assistance needed, associated costs, and/or the sources and authorities that will be relied upon. • Assessment of the benefits and costs of the actions.
10. Summary of the *public participation process*: • Plan included an opportunity for public comment.	e. An information/education component that will be used to enhance public understanding of the project	• *A Public Education Plan (PEP) is required as detailed in Part I Section A.3.b. of the permit… "The*	• Phase II has specific requirements including a stormwater P2 element.

• Plan identifies how public input and comment were solicited. • Plan identifies the partners that were involved in the development of the plan, and their roles and responsibilities. • Plan involved a wide variety of agencies and interests, including those most affected by the plan and/or able to help implement the plan.	and encourage their early and continued participation in selecting, designing, and implementing the NPS management measures that will be implemented.	*PEP shall promote, publicize, and facilitate watershed education for the purpose of encouraging the public to reduce the discharge of pollutants in storm water to the maximum extent practicable… The PEP shall describe a method for determining the effectiveness of the various public education activities.* • *Watershed Partners (both permitted and voluntary must be identified in the permit application.* • *There must be a process to involve the watershed jurisdictions and the public in the development of the WMP.*	
9. The estimated period of *time needed to complete each task* and the proposed *sequence of task completion*.	f. A schedule for implementing the NPS management measures identified in this plan that is reasonably expeditious.	• Commitments, identified by specific permittee or others, to implement actions by specified dates necessary to achieve the short-term objectives *and to initiate achievement of the long term goals.*	• NPS and 319 are equivalent and do not require specific dates only a plan year or range. • Phase II requires specific dates for completion.
	g. A description of interim, measurable milestones for determining whether NPS management measures or other control actions are being implemented.	• Short-term measurable objectives	Establish measurable interim milestones for water quality improvement and progress on implementation efforts.

11. A description of the process that will be used to *evaluate the effectiveness* of implementing the plan and achieving its goals.	h. A set of criteria that can be used to determine whether loading reductions are being achieved over time and substantial progress is being made towards attaining water quality standards and, if not, the criteria for determining whether this watershed-based plan needs to be revised.	• Methods for evaluation of progress, which may include chemical or biological indicators, flow measurements, erosion indices, and public surveys.	Establish a process and criteria for evaluating the effectiveness of the plan and the resulting changes in water quality. The monitoring component should include required project specific needs, the measurable interim milestones, local monitoring efforts and it should also be tied to the State water quality monitoring efforts (i.e. environmental, social, administrative, and water quality elements).
	i. A monitoring component to evaluate the effectiveness of the implementation efforts over time, measured against the criteria established under item (h) immediately above.		

Column 1 DEQ CMI Required Elements – Excerpted from the watershed plan approval checklist.
Column 2 EPA Minimum Elements – Excerpted from the FY03 Section 319 Guidance.
Column 3 Michigan's Phase II Minimum Requirements – Excerpted from Section 1.B.1. of the "Watershed" Permit. Information in this column that is in *italics* is not a requirement for the WMP but comes from other portions of the permit or permit process.
Column 4 Elements needed for a plan to be consistent with all three programs.