

Appendix A Huron-Clinton Metropolitan Authority

Phase II Storm Water Permit:

Post-Construction Storm Water Control – Alternate Approach

The Huron-Clinton Metropolitan Authority (HCMA) hereby submits to the Michigan Department of Natural Resources and Environment (MDNRE) an alternative method for meeting the post-construction requirements found in Part I.A.8 of General Permit No. MIS049000. While existing practices encourage cooperation with local communities and impacted Counties, the HCMA does not have regulatory powers to address storm water issues on properties not owned and operated by the HCMA and this approach applies only to HCMA Facilities when industry accepted standards are deemed to be impractical upon review by the HCMA Storm Water Program Manager.

Under this alternate approach, the HCMA proposes to:

1. Follow the *minimum treatment volume standard* found in Part I.A.8 of the General Permit.
2. Utilize existing impoundments, managed by the HCMA, to meet the channel protection criteria established by the general permit.

The Huron-Clinton Metropolitan Authority is a regional park authority serving Livingston, Macomb, Oakland, Washtenaw and Wayne Counties. Since its inception, the Authority has created thirteen Metroparks covering nearly 25,000 acres within the five counties. Nearly 80% of the total HCMA land holdings, or approximately 20,000 acres are left in a natural state. 3,500 acres are developed for recreation, interpretation or other public uses, and an additional 1,400 acres is open space or leased to local municipalities.

During the creation of the Metropark System, several impoundments along and within the Huron and Clinton River were created or purchased by the Authority. These impoundments include Stony Lake, Kent Lake, Washago Pond and the Flat Rock Dam impoundments. Although these impoundments are not designed as flood control structures, they serve a detention function for storm water runoff from the surrounding land owned by the HCMA. The impoundments are relatively large when compared to the adjoining improvements within the parks and can easily accommodate storm runoff from our developments with negligible effects to the peak flow and volume leaving the jurisdiction of the HCMA.

Under this alternative approach, the HCMA will contact the local unit of government(s) to evaluate the feasibility of this method on a case by case basis. After due consideration, if it is deemed that the use of this method will have negligible effects on the environment, aquatic species, wildlife and adjoining riparian owners, the HCMA will utilize this alternative approach. If the HCMA deems this approach to be detrimental to the water resources, this alternative approach will not be utilized. Failure to find a feasible alternative to this approach will result in project reevaluation.

This approach will be used during the redevelopment of existing use areas when the existing site layout would limit the use of standard BMPs. As the HCMA redevelops many of our aging and antiquated facilities, we are aiming to meet the following goals:

- Reduce the amount of impervious areas by reducing the amount of paved parking areas. Where feasible, the HCMA will eliminate parking spaces and return the area to open space or other non-developed use.
- Increase green space and natural areas to provide infiltration of water and reduce pavement maintenance.
- Treat storm water runoff to protect water quality at water-based recreation areas which are within close proximity to some outfalls.
- Construction and Renovation of buildings will be undertaken after careful consideration of how to incorporate BMP's into the facilities.

Following this procedure to achieve our goals, the HCMA will be reducing the storm water runoff from the existing sites. Water quality will not be negatively affected utilizing this method and the volume of runoff will decrease after the redevelopment ensuring that the receiving water channels are protected from increased storm runoff.