

APPENDIX 2



CITY OF NOVI STORM WATER POLLUTION PREVENTION PLAN

(Also referred to as the Storm Water Pollution Prevention Initiative)

Storm Water Pollution Prevention Initiative

Michigan General Permit Number MIG61000

Certificate of Coverage Number MIG610030

Municipality/Agency: City of Novi

Address: 45175 West Ten Mile Road

Permit Coordinator: Anthony Nowicki, DPS Director Telephone: 248-347-0454

SWAG Representative: David Maurice, GIS/ES Manager Telephone: 248-347-0499

Permittee Representative: Richard Clark, Mayor Date: December 3rd, 2001

Signature of Permittee Representative: _____

1. Purpose

The purpose of this Storm Water Pollution Prevention Initiative (SWPPI) is to bring together the goals and actions from the Watershed Management Plan (WMP), Illicit Discharge Elimination Plan (IDEP), and the Public Education Plan (PEP) into a single document containing the City of Novi commitments necessary to reduce the discharge of pollutants to the maximum extent practicable. The SWPPI includes those actions to be implemented over the term of the permit, and in some cases beyond the term of the permit.

2. Annual Report to Assess Progress

In order to assess our progress, City of Novi will document the following on an annual basis:

- Changes to goals and/or actions in the WMP prior to the required permit date for biannual review and revision
- Progress with respect to specific goals and/or actions
- Actions taken to eliminate illicit discharges.
- Schedule for elimination of illicit connections identified but not eliminated.
- Documentation of the public education effort and an evaluation of its effectiveness.
- Any additional actions taken to reduce the discharge of pollutants in storm water.
- Progress on approved activities under IDEP and PEP.
- Modifications to approved IDEP and PEP, if applicable.

3. Subwatershed Plan and SWPPI Revisions

The SWPPI will be reviewed and revised as necessary every two years. Revisions to date-specific commitments listed in Table 2 can be made with approval of MDEQ. The WMP and the SWPPI can be revised at the same time, but will be due on the revision date for the WMP.

4. Retention of records

The City of Novi will retain the approved Storm Water Pollution Prevention Initiative and its associated records in-house for a minimum of three (3) years after the termination of the permit. The records will be available upon request by MDEQ and shall include, but not be limited to:

- Information regarding the effectiveness of these activities;
- Records of analyses performed;
- Calibration and maintenance of instrumentation, if used;
- Recordings from continuous monitoring instrumentation.

5. SWPPI goals and priorities of the City of Novi

The City of Novi is located in the headwaters of the Rouge River watershed, of which a majority portion lies in the Middle 1 Subwatershed and a small portion in the Upper1 Subwatershed. The western portion of the City of Novi resides mainly in the Huron River watershed. According to the City of Novi Master Plan, the city is approximately 70% developed, so there is still much the City can do in the future during the progression towards full build-out to mitigate storm water pollution.

The City of Novi SWPPI was prepared from Middle 1 Subwatershed Management Plan even though part of the City of Novi resides in the Upper 1 subwatershed. The reason for this is that the Middle 1 SWAG is the primary advisory group in which the City of Novi has participated and we feel that the comprehensiveness of the Middle 1 Plan encompasses many of the goals and objectives for both subwatershed areas.

The City of Novi SWPPI includes three tables. Table 1 titled “Goal-Specific Long Term Assessment of Progress in the Middle 1 Subwatershed”, identifies what evaluation methods will be used to determine the success of our SWPPI actions. Table 2 titled “Storm Water Pollution Prevention Initiative for the City of Novi”, identifies the specific actions that the City of Novi will undertake as part of our pollution prevention implementation. Table 3 titled “SWMP Pollution Prevention Actions not included in the City of Novi SWPPI”, identifies actions that are part of the Middle 1 Subwatershed Plan, but will not be undertaken as part of our SWPPI implementation at this time, but may be undertaken in future SWPPI revisions upon further evaluation.

The purpose behind this method is to provide an ease of understanding of the initiative and to clearly identify the actions being proposed for implementation through the SWPPI. In addition, we hope to streamline any budget approval process for actions that have yet to be implemented. By breaking out these actions the City of Novi can develop continuity between future implementation and revisions of the SWPPI, and ensure actions that are not currently being proposed can be considered in future revisions of the SWPPI if necessary.

6. Storm Water Pollution Prevention Development

This SWPPI has been designed and will be implemented to reduce the discharge of pollutants to the maximum extent practicable and is consistent with the Middle 1 Subwatershed Management Plan developed under Part I.B.1 of the General Permit, and includes those actions to be implemented over the term of this permit. This SWPPI will be implemented upon approval of the District Supervisor, and includes:

1. Actions required of the City of Novi in the Middle 1 Subwatershed Management Plan as described in Table 2.
2. Evaluation and implementation of pollution prevention and good housekeeping activities, as appropriate, having considered the following practices:
 - a. Maintenance activities, maintenance schedules, and inspection procedures for storm water structural controls to reduce pollutants (including floatables) in discharges from our permitted separate storm water drainage system;
 - b. Controls for reducing or eliminating the discharges of pollutants from streets, roads, highways and parking lots;
 - c. Procedures for the proper disposal of operation and maintenance waste from the permitted separate storm water drainage system (dredge spoil, accumulated sediments, floatables, and other debris);
 - d. Ways to ensure that new flood management projects assess the impacts on the water quality of the receiving waters and, whenever possible, examine existing projects for incorporation of additional water quality protection devices or practices; and
 - e. Implementation of controls to reduce the discharge of pollutants related to application of pesticides, herbicides, and fertilizers applied in our permitted jurisdiction.
3. Evaluation and implementation of site appropriate, cost-effective structural and nonstructural best management practices (BMPs) to minimize the water quality impacts from areas of new development and significant redevelopment, with the understanding that the goal is to protect the designated uses in the receiving waters from the effects commonly associated with urbanization.
4. The methods of assessing subwatershed progress in storm water pollution prevention, as summarized for each of the Subwatershed Management Plan(s) Goals in Table 1.

Table 1 lists the WMP Goals associated with the Middle 1 and the Upper 1 subwatershed(s) and the reasons why a specific goal, if any, does not apply to the City of Novi. It is recognized by the City of Novi and the MDEQ that the subwatershed targets and schedules in Table 1 are intended to track effectiveness and progress of the SWPPI actions, and progress towards the subwatershed goals. The targets and schedules are not enforceable compliance items required by the permit, and the City of Novi will not be found in noncompliance with the permit if they are not achieved. The City of Novi actions and schedules in Table 2 are enforceable. If, during SWPPI revisions, it is determined that progress towards achieving the subwatershed targets is not being made, the City of Novi and the MDEQ will negotiate additional and/or alternative actions, schedules, or targets.

Table 2 outlines the specific activities that City of Novi has undertaken, or will undertake, with respect to each of the applicable goals and/or actions.

Table 1. Goal-Specific Long Term Assessment of Progress in the Middle 1 Subwatershed

#	SWMP Goals	N/A *	Methods for Evaluating Progress in River	Target for Evaluation in the Subwatershed	Responsible Party for Evaluating Progress
1	Reduce flow variability.		<ul style="list-style-type: none"> A. New USGS station at downstream end of M1 subwatershed. B. City of Novi and other southeast Michigan rainfall monitoring. C. Flow monitoring put in place by RPO through coordination of Middle 1 and Upper 1 subwatershed groups. D. Macroinvertebrate monitoring. 	<ul style="list-style-type: none"> • To not exceed target peak flows for more than 10% of the time at @ D02: 8 cfs; @ D03: 14 cfs.; @ D08: 22 cfs.; These targets will be reviewed with data from D02, D03, D08, and new USGS gage in 2001. New targets may be set. • Improved long-term trends in macroinvertebrate community health. 	<ul style="list-style-type: none"> A. USGS B. NOVI C. RPO D. FOTR <p>(The responsible party listed for evaluation of progress may change based on future changes in organization involvement and structure.)</p>
2	Reduce nutrient loading, especially with regard to all impoundments of the Middle Rouge River, upstream from of and including Newburgh Lake.		<ul style="list-style-type: none"> A. Dry and wet weather sampling at specific locations within the City of Novi.. B. Macroinvertebrate monitoring. 	<ul style="list-style-type: none"> • Using 0.05 mg/l TP in dry weather as a reference for systems with impoundments, study and identify sources of TP in subwatershed to determine date by which we can expect to achieve 0.05 mg/l TP (or other target shown to support fair to good aquatic diversity, if found), by 2003. • Improved long-term trends in macroinvertebrate community health. 	<ul style="list-style-type: none"> A. RPO B. FOTR
3	Reduce soil erosion and sedimentation.		<ul style="list-style-type: none"> A. Dry and wet weather sampling at specific locations within the City of Novi. B. Habitat assessment, embeddedness and bottom deposition measures. C. Macroinvertebrate monitoring. D. Biological monitoring. 	<ul style="list-style-type: none"> • Based on achieving desired aesthetic use, maintain or achieve TSS concentrations below 80 mg/l in dry weather conditions, by 2006. • Based on GLEAS habitat assessment, maintain or improve current embeddedness and bottom deposition ratings by 2006. • Improved long-term trends in macroinvertebrate community health. • Improve GLEAS 51 scores of “fair” for all sampling locations, by 2005 and increase to “good” by 2015. • Maintain GLEAS 51 scores of “good” for all sampling locations, by 2005 and increase to “good” by 2015. Review 2000 MDEQ data and revise goals to reflect changes. 	<ul style="list-style-type: none"> A. RPO C. FOTR D. FOTR E. MDEQ/GLEAS

4	Protect and mitigate the loss of natural features.		<p>A. Evaluate frog and toad population trends.</p> <p>B. Biological monitoring.</p> <p>C. GIS analysis involving wetlands, woodlands, parks areas and other green space within the City of Novi.</p>	<ul style="list-style-type: none"> Track and report frog and toad populations to detect trends in decline or increase over time and relate to land use changes, habitat protection. Improve GLEAS 51 scores of “fair” for all sampling locations, by 2005 and increase to “good” by 2015. Maintain GLEAS 51 scores of “good” for all sampling locations, by 2005 and increase to “good” by 2015. Review 2000 MDEQ data and revise goals to reflect changes. 	<p>A. FOTR</p> <p>B. MDEQ/GLEAS</p> <p>C. NOVI</p>
5	Increase opportunities for passive and active recreational uses.		<p>A. Recreational use and monitoring and surveys.</p> <p>B. Dry and wet weather sampling at specific locations within the City of Novi.</p>	<ul style="list-style-type: none"> Increase in passive and active recreational uses reflected in monitoring and surveys. Based on achieving desired aesthetic use, maintain or achieve TSS concentrations below 80 mg/l in dry weather conditions, by 2006. 	<p>A. RPO</p> <p>B. NOVI</p>
6	Improve water quality, water quantity and biological monitoring in the subwatershed to measure progress.		<p>A. Long-term in-stream monitoring plan implemented by the RPO for the Middle 1 and Lower 1 communities in 2001.</p> <p>B. Work with FOTR to implement volunteer monitoring programs.</p>	<ul style="list-style-type: none"> Evaluation method(s) provided in Table 2. 	<p>A. RPO</p> <p>B. MDEQ/GLEAS</p>
7	Increase public understanding of their role in protecting water quality.		<p>A. Reporting on activities performed and evaluating success.</p> <p>B. Evaluate monitoring results at a regular interval.</p>	<ul style="list-style-type: none"> Evaluation method(s) provided in Table 2. 	<p>A. NOVI</p> <p>B. RPO</p>
8	Integrate storm water management in planning and land use approval process.		<p>A. Reporting on activities performed and evaluating success.</p>	<ul style="list-style-type: none"> Evaluation method(s) provided in Table 2. 	<p>A. NOVI</p>
9	Establish financial and institutional arrangements for the fulfillment of the SWPPI.		<p>A. Reporting on activities performed and evaluating success</p>	<ul style="list-style-type: none"> Evaluation method(s) provided in Table 2. 	<p>A. NOVI</p>
10	Enforce action plans and increase accountability for storm water management.		<p>A. Reporting on activities performed and evaluating success.</p>	<ul style="list-style-type: none"> Evaluation method(s) provided in Table 2. 	<p>A. NOVI</p>

* Explanation required in Section 5



Table 2: Storm Water Pollution Prevention Initiative for the City of Novi

Action	WMP Goals Addressed	Permit Required Activities	Current Status, Method of Implementation, and Schedule	Estimated Cost for Implementation, or to Document, or allocate resources for, and Department Assignment	Methods of measuring progress (to be documented in SWPPI annual report)
<p>Approved Illicit Discharge Elimination Plan (IDEP) projects/programs as per current General Permit (in italicized type) and any additional related projects/programs since the approval of the IDEP. Note: ALL approved IDEP items must be transferred into this summary SWPPI.</p>					
<i>Regular inspection and visual screening of the network infrastructure</i>	2, 5	IDEP	<p>Status: Currently Implemented Method of Implementation and Schedule: As part of their regular responsibilities, the Department of Public Works (DPW) Drain staff allocates one day per week to direct their attention toward inspection of the storm drain system to ensure proper function and to detect and locate any illicit discharges or connections. DPW staff will continue this effort on a regular basis to ensure that 20% of all network screening of the network is done annually.</p>	<p>Estimated Cost: \$15,000 annually (20% of storm drain network inspected every year, with features being inspected every 5 years or on an as required basis.) Department Assignment: Department of Public Works</p>	Reporting by the DPW in document or spreadsheet format on a monthly basis, to be included in the annual report to the MDEQ. The report will also include a summary of the monthly activities and will identify the number of outfalls, drains and sewers inspected.
<i>Coordinate existing tracking and document system with the various departments</i>	2,5	IDEP	<p>Status: Not Currently Implemented Method of Implementation and Schedule: The City of Novi receives complaints in various departments including the Fire, Police, and Public Works. Departments that receive complaints currently use their own software system to log complaints. The City will implement one complaint tracking system for all departments.</p>	<p>Estimated Cost: \$2,000 software acquisition and implementation cost, \$500 annual maintenance. Department Assignment: Information Technology</p>	Reporting by the IT Department in document or spreadsheet on a quarterly or annual basis, to be included in the annual report to the MDEQ until a system has been implemented across department.
<p><i>Catch Basin Cleaning (18*)</i></p> <p><small>*Note-Numbers seen next to the action item refer to the SWMP action #, and are listed for City of Novi tracking purposes only.</small></p>	2, 5	IDEP 2a	<p>Status: Currently Implemented Method of Implementation and Schedule: As part of their responsibilities, the DPW Drain staff has allocated one day per week to direct their attention toward inspection of the storm drain system to ensure proper function of the system and to detect and locate any illicit discharges or connections. DPW staff will continue this effort to ensure that 20% of all network screening of the network is done annually or on an as required basis.</p>	<p>Estimated Cost: \$15,000 annually (20% of catch basins cleaned annually or when necessary.) Department Assignment: Department of Public Works</p>	Reporting by the DPW in document or spreadsheet on a monthly basis, to be included in the annual report to the MDEQ. The report will include the number of catch basins cleaned.

Street Sweeping (18)	2, 3	2b	Status: Currently Implemented Method and Implementation and Schedule: The City of Novi has one street sweeper as part of its equipment line-up and the DPW Street staff conducts street sweeping in the City on a regular basis. An area of focus is the developments under construction where sweeping may be required more frequently.	Estimated Cost: \$150 per curb mile for sweeping and disposal. Department Assignment: Department of Public Works	Reporting by the DPW in document or spreadsheet on a quarterly or annual basis, to be included in the annual report to the MDEQ.
Approved Public Education Plan (PEP) projects/programs as per current General Permit (in italicized type) and any additional related projects/programs since the approval of the PEP. Note: ALL approved PEP items must be transferred into this summary SWPPI.					
<i>Education for Land Use Decision Makers/staff (3)</i>	7, 8, 10	PEP	Status: Currently Implemented Method and Implementation and Schedule: The City of Novi DPW staff has attended educational seminars put on by Wayne County over the past couple of years. The City of Novi will have additional staff attend educational seminars and will also consider hiring an outside firm to have training on site for certain staff and decision-makers.	Estimated Cost: \$2000 annually for 2002 and 2003 Department Assignment: All	Evaluating the number of staff and decision makers that attend education sessions and reporting this in the City of Novi's annual report in 2003.
Septic System Maintenance Programs (14)	1, 7	2a	Status: Not Currently Implemented Method and Implementation and Schedule: The City of Novi has submitted a schedule to the MDEQ on this issue to determine the exact number of septic systems in the City of Novi in the first quarter of 2002, and will mail out informational pieces to those residents in April, 2002. Septic priority zones will be established and inspected every 2 years.	Estimated Cost: \$4,000 annually for 2002-2003 Department Assignment: Department of Public Services – Geographic Information System, Neighborhood Services, Public Information Department	Determination of the number of septic systems in the City of Novi using the GIS, and the number of mailings to be sent out to those residents. Reporting in the City of Novi' Annual Report. The report will also include the number of failures and corrections.
<i>Developing and Disseminating written materials and utilizing other media (38)</i>	7, 8, 9, 10	PEP	Status: Currently Implemented Method of Implementation and Schedule: The DPW staff, Neighborhood Services Department, and the Water and Sewer Department all distribute information at their front counters, and have information available to distribute to the public if necessary. The City of Novi has also placed information on the web site, the Kiosk in the Atrium, and other locations in the Civic Center for distribution. As part of their efforts DPW staff may distribute informational pieces to residents they come in contact with to inform them about drainage and septic issues.	Estimated Cost: \$15,000 annually for 2002-2003 Department Assignment: Public Information Department, Neighborhood Services, Water and Sewer Department, Department of Public Works, Department of Public Services	Reporting will include copies of the materials created and disseminated and a summary of the number of mailings sent out.
Storm Water Pollution Prevention Awareness signs in parks and at river crossings (No action #)	7	NA	Status: Currently Implemented Method of Implementation and Schedule: The Parks and Rec. Dept will use the model for placing signage in the parks that was incorporated by Plymouth Twp as part of an RPO grant project. Further, the DPW Sign Department will complete the installation of signs at river crossings not completed in the first phase of the sign installation project.	Estimated Cost: \$20,000 for the project over calendar years 2002-2003 Department Assignment: Parks and Recreation Dept, DPW Sign Department	Noticeable placement of signs in community parks

Other Best Management Practice project/programs that do not necessarily fall under the categories of the IDEP or PEP.

Storm Water Management Ordinance (1)	1-3, 8, 10	2c, 2d	<p>Status: Currently Implemented Method of Implementation and Schedule: The City of Novi Storm Water and Watershed Stewardship Committee, the Ordinance Review Committee, and currently in the process of developing a Storm Water Ordinance. The ordinance is currently in review and expected to be adopted pending further discussion in the fourth quarter of 2001.</p>	<p>Estimated Cost: \$10,000 for development and implementation, \$5,000 annually for ordinance coordination Department Assignment: Department of Public Services, Storm Water and Watershed Stewardship Committee, Ordinance review Committee</p>	Submit a copy of ordinance with 2002 annual report.
Construction of New Detention Basins; Dredging, or Retrofitting of existing basins(4)	1-3, 7	2b, 2c, 2e	<p>Status: Currently Implemented (Partially) Method of Implementation and Schedule: The City of Novi will conduct an analysis during the fiscal 2002-2003 budget year to determine what detention basins can be retrofitted to improve storm water quantity and quality. If it determined that there are basins that can be improved, then the City of Novi will propose budget funding in fiscal year 2003-2004. In addition detention basins and projects are currently on-going in the City of Novi Dunbarton, Haggerty and Ingersol detention basin projects</p>	<p>Estimated Cost: Retrofit Study: To be Determined \$1,500,000 in detention basin construction through 2003 including the Haggerty, Ingersol, and Dunbarton detention basin projects Department Assignment: Department of Public Services</p>	Report on status of detention basin construction progress and dredging, and retrofitting basin candidates in annual reports in 2002and 2003.
Streambank Stabilization Projects (6)	2-3, 4	3	<p>Status: Currently Implemented Method of Implementation and Schedule: The City of Novi Department of Public Services currently has one RPO grant project underway and the Engineering staff is also in the process of preparing a RFP for a streambank stabilization work to be done on a stretch of Bishop Creek from 10 Mile to Meadowbrook Road sometime during the 2nd or 3rd quarter of 2002.</p>	<p>Estimated Cost: \$2,000 per lineal feet of streambank. A stream bank stabilization site evaluation project is currently underway with a maximum project budget of \$72,000. Department Assignment: Department of Public Services</p>	The number of streambank projects implemented and the total number of stream bank stabilized in feet. Reduction in the amount of suspended solids contained in future water samples.
Detention Basin Maintenance Programs and Implementation of tracking work (16)	1-4, 7	2a	<p>Status: Currently Implemented Method of Implementation and Schedule: The City of Novi Department of Public Services currently conducts detention basin maintenance on basins as needed. Tracking of the effort put forth for this activity may need to be strengthened and will be analyzed to determine if and where improvements can and should be made.</p>	<p>Estimated Cost: \$2,000 for tracking system to document maintenance progress Department Assignment: Department of Public Works</p>	Increased tracking of complaints and responses. Better reporting within the City of Novi between departments, and the number of basins where maintenance occurred.

Soil Erosion and Sedimentation Control Ordinances (19)	3, 8, 10	2a	Status: Currently Implemented Method of Implementation and Schedule: The City of Novi Department has adopted a Soil Erosion and Sedimentation Control Ordinance to mitigate the erosion and sedimentation in the City of Novi.	Estimated Cost: NA Department Assignment: Neighborhood Services, Code Enforcement Division	Ordinances currently in place. The annual report to the MDEQ will include the number of violations and the actions/corrections made.
Improvement of SESC Inspection and Enforcement Practices (23)	3, 10	2a	Status: Not Currently Implemented Method of Implementation and Schedule: The City of Novi will look at ways during the construction off-season of 2001-2002 to improve the inspection and enforcement of soil erosion practices. Any procedures that need to be implemented will be in place for the beginning of the construction season of 2002.	Estimated Cost: \$10,000 annual through 2003 Department Assignment: Planning, Code Enforcement Division	Increased enforcement of erosion control ordinance regulations.
Soil Erosion and Sedimentation Control Education for the Public and Development Community (24)	3, 7, 8, 10	PEP	Status: Currently Implemented Method of Implementation and Schedule: The City of Novi Department Neighborhood Services Department currently produces and distributes materials regarding soils erosion and sedimentation control has adopted a Soil Erosion and Sedimentation Control Ordinance to mitigate the erosion and sedimentation in the City of Novi.	Estimated Cost: \$2,000 annually Department Assignment: Building, Neighborhood Services, Code Enforcement Division	Number of staff members receiving education on soils erosion and sedimentation control.
Conduct Natural Features and Conservation Easement Inventory or Assessments (25)	4, 5, 8, 10	NA	Status: Not Currently Implemented Method of Implementation and Schedule: As part of the effort to increase Greenways in the City of Novi, the Planning Staff is in the process of applying for a grant determine the location of conservation easements. Along with the natural features data and utility corridor information we can then determine where additional Greenways trails can be established. The information and project will be completed by 2003	Estimated Cost: \$20,000 Department Assignment: Developmental Services	NA
Encourage Conservation Easements to protect Natural Features (28)	4, 5, 7, 9	2d	Status: Not Currently Implemented Method of Implementation and Schedule: The City of Novi Building Department will look at ways to encourage additional conservation easements to protect natural features during the calendar year 2002, and make any adjustments to the existing ordinances during calendar year 2003.	Estimated Cost: NA Department Assignment: Building Department, Department of Public Services	Comparative analysis of existing conservation easements, and assessment and evaluation of location of easements and develop recommendations for additional location.
Work with MDEQ and RPO to review existing monitoring programs (33)	6, 10	NA	Status: Not Currently Implemented Method of Implementation and Schedule: The City of Novi will continue to participate in the Middle 1 SWAG as its main SWAG group. We will provide input on direction along with other SWAG communities to direct monitoring in the future as required.	Estimated Cost: \$1,000 Department Assignment: Department of Public Services	NA
If necessary, establish additional long-term monitoring program (35)	6, 9, 10	4	Status: Not Currently Implemented Method of Implementation and Schedule: The City of Novi will continue to participate in the Middle 1 SWAG as its main SWAG group. We will provide input on direction along with other SWAG communities to direct monitoring as required.	Estimated Cost: To be determined at future date. Department Assignment: Department of Public Services	NA

Ongoing Events and Stewardship and Involvement Activities (36)	6, 7	NA	Status: Currently Implemented Method of Implementation and Schedule: The City of Novi has numerous events throughout the year such as Household Hazardous Waste Day, River Day, Spring Summit, on-going Storm Water and Watershed Stewardship Committee meetings among others, and will continue to host these events in the future.	Estimated Cost: \$10,000 annually Department Assignment: Public Information Department, Neighborhood Services, Water and Sewer Department, Department of Public Works	Comparison of the number of events held in the City of Novi each year, and an increase in the number of residents participating in those events.
Support of local Creek/Lake Protection Groups (37)	7, 9	NA	Status: Not Currently Implemented Method of Implementation and Schedule: The City of Novi will look to provide support for local watershed groups and organize an effort to do so through the various departments as appropriate beginning in 2002.	Estimated Cost: \$1,000 annually Department Assignment: Public Information, Neighborhood Services, Department of Public Works	Indicate the organizations that are being supported by the City of Novi and indicate the progress of this effort in the annual report.
Explore Need for New Staffing (41)	9, 10	NA	Status: Not Currently Implemented Method of Implementation and Schedule: The City of Novi will propose hiring additional staffing in the 2002-03, and 2003-04 budget to specifically handle environmental education and provide engineering expertise in the area of storm water management, additional DPW personnel, and others where required.	Estimated Cost: \$40,000 per additional employee (avg.) Department Assignment: Public Information, Neighborhood Services, Water and Sewer, Public Works, Human Resources Departments	Whether new staffing was able to be approved during the budget process from year to year.
Determine entity to produce and coordinate technical watershed-wide information (42)	9	NA	Status: Not Currently Implemented Method of Implementation and Schedule: The City of Novi will continue to participate in the Middle 1 SWAG as its main SWAG group. We will provide input and direction along with other SWAG communities to determine who will produce and coordinate technical information watershed wide.	Estimated Cost: \$1,000 Responsible Department Assignment: City of Novi representative attending SWAG meetings.	Work with SWAG and report on decisions made as a group in the City of Novi Annual Report.
Continue involvement in the SW General Permit program (44)	9, 10	NA	Status: Currently Implemented Method of Implementation and Schedule: The City of Novi will continue to participate in the Middle 1 SWAG as its main SWAG group. We will provide input and direction along with other SWAG communities toward the permit process.	Estimated Cost: \$2,000 annually Department Assignment: City of Novi representative attending SWAG meetings	Continue to work and participate in monthly SWAG meetings and include in Annual Report.
Enhance soil erosion ordinance compliance, procedures (44)	8, 9, 10	2a	Status: Currently being Implemented Method of Implementation and Schedule: The City of Novi will look at ways during the construction off-season of 2001-2002 to improve the inspection and enforcement of soil erosion practices. Any procedures for implementation will be in place for 2002.	Estimated Cost: \$10,000 Department Assignment: Neighborhood Services, Code Enforcement Division	Submit a copy of the Soils Erosion Permit changes to DEQ with annual report.
Geographic Information Systems improvement / projects (45)	8, 10	NA	Status: Currently Implemented Method of Implementation and Schedule: The City of Novi will continue to use its GIS as a tool to maintain information on the storm drain system, natural features, and septic systems systems within the City of Novi.	Estimated Cost: \$10,000 annually through 2003 Department Assignment: Department of Public Services – Geographic Information Systems	Continue to use the GIS for Storm Water Management issues and include tables, maps, and reports generated with the GIS in the City of Novi Annual Report.



Table 3: SWMP Pollution Prevention Actions not included in the City of Novi SWPPI for planning years 2002-2003, but may be reevaluated for inclusion in future SWPPI revisions.

Action	WMP Goals Addressed	Permit Required Activities	Justification for exclusion from current SWPPI implementation.	Methods of measuring progress (to be documented in SWPPI annual report)
Other Water Resource Protection Ordinances (2)	1-5, 8, 10	NA	Upon further review of the existing City of Novi ordinances and with the development and implementation of the City's Storm Water Ordinance, it has been determined that other ordinances are not necessary at this time.	NA
Storm water Standards for Redevelopment (5)	1-3, 8, 10	NA	Based on the development and adoption of a storm water ordinance it has been determined that the City standards for development are adequate in this situation.	NA
Log Jam Inventory and Management (7)	1, 5	NA	Based on further evaluation it has been determined the tracking of log jams in the City of Novi would be cost ineffective as part of improving water quality in the Rouge watershed.	NA
Rain Barrel Pilot Project (8)	1, 7	2b	Based on further evaluation it has been determined to include rain barrel information as part of our Public information efforts rather than an implementing a pilot project with a specified number of implementations.	NA
Wetland/Natural areas Restoration (9)	1-5	NA	Based on further evaluation it has been determined that wetland and natural areas restoration at this point to be too costly as part of the effort to improve water quality. The City of Novi will continue to enforce wetland and woodland preservation as development projects occur.	NA
Continue Programs to Eliminate Sources of Bacteria that prevent desired recreational activities (30)	5, 10	NA	Currently, the City of Novi has no specific programs to eliminate sources of bacteria that prevent desired recreational activity. Our strategy is focus on other IDEP programs to limit sources of bacteria.	NA
Local Fertilizer Ordinance (10)	2, 7, 10	NA	The City of Novi Storm Water and Watershed Stewardship Committee (SWWSC) discussed and rejected the adoption of a local fertilizer ordinance.	NA

On-Site Sewage Disposal System Ordinance (11)	5, 10	NA	The City of Novi will not adopt a OSDS Ordinance at this time, and has agreed to locate the septic systems in the City using the GIS, and will provide information through direct mail for these residents.	NA
Revising Local Weed Ordinances (12)	1-4, 7, 10	NA	The City of Novi currently has an ordinance to control weed growth on vacant and improved properties.	NA
Animal/pet Waste Management Programs (15)	5, 7	NA	After further evaluation the City of Novi has decided at this point not to adopt a program to manage animal and pet waste.	NA
Golf Course Nutrient management (17)	2-5, 7	NA	Due to the limited number of courses in the City of Novi, it has been determined that we will not adopt a Golf Course Nutrient Management Program.	NA
Natural Features Setback Ordinance (20)	1-4, 8, 10	NA	Currently the City of Novi Zoning Ordinance currently requires a 25 foot setback from natural features and this provision of the Zoning Ordinance addresses this issue.	NA
Study / Recommend new SESC Techniques (21)	3, 10	NA	It has been determined that the City of Novi Soil Erosion and Sedimentation control techniques are adequate at this time. No study of new techniques is being proposed, but rather the City of Novi will focus on enforcement of current regulations.	NA
Encourage Agricultural BMPs (22)	2, 3, 7, 10	NA	Due to the fact that there is no agriculture in the City of Novi we will not be encouraging or adopting a program regarding agricultural BMPs.	NA
Develop Restoration Plans and Programs (26)	1-5	NA	No program is being proposed at this time.	NA
Review Wetlands, Woodlands/Tree Replacement, Natural Features Setback and Zoning Ordinance (27)	4, 10	NA	Ordinances are in place at the City of Novi that cover these issues and therefore no further review of these ordinances are proposed at this time. The City of Novi Wetlands and Woodlands ordinances are current and the setback for natural features are indicated in the Zoning Ordinance.	NA
Identify and Prioritize key potential recreational areas and activities (29)	4,5	NA	Currently, the City of Novi Parks and Recreation Department are in charge recreational activities in the City. Until water quality has significantly improved to provide recreational activities this action item will not be undertaken.	NA

Improve aesthetics of river (31)	4, 5, 7	NA	Upon further review, the general action to improve aesthetics to the river is too vague, and the costs associated with this could be prohibitive. The City of Novi currently has projects underway to improve park facilities. Until water quality has significantly improved and recreational activities increase in these areas we will not be undertaking any aesthetics improvement projects.	NA
Improve potential for a recreational fishery in the Middle Rouge (32)	5, 7	NA	Upon further review, it has been determined that the improvement of a recreational fishery in the City of Novi will improve with water quality. This action item will not be undertaken until water quality has significantly improved to provide recreational fishery activities in the City of Novi.	NA
Identify specific desired uses to direct monitoring (34)	5, 6	NA	The City of Novi is in favor of having the SWAG's identify desired uses for direct monitoring along with other communities, the RPO, and the MDEQ. This is not an action item the City of Novi feels that has the expertise to handle.	NA
Develop Ordinance and Incentive explanations handbook (39)	7, 8, 10	NA	The City of Novi feels that a public information program to disseminate specific information is a more effective method of educating the public. The City of Novi ordinance information is currently available via the City of Novi web site with a brief explanation of the content.	NA
Develop Local Financial Arrangements (40)	9	NA	Other than having the various departments apply for grant projects to implement permit activities, the City of Novi will not develop any financial arrangements to fulfill its permit requirements.	NA