



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

August 22, 2014

VIA E-MAIL

Mr. Seth Brown
Stormwater Program and Policy Director
Water Environment Federation
601 Wythe Street
Alexandria, Virginia 22314-1994

Dear Mr. Brown:

The Michigan Department of Environmental Quality (MDEQ), Water Resources Division, is pleased to support the recommendations of the National Stormwater Testing and Evaluation of Products and Practices (STEPP) Workgroup Steering Committee. The MDEQ applauds the investigative effort by the STEPP Workgroup Steering Committee to assess the need and feasibility of a testing and evaluation program as outlined in the white paper titled "Investigation into the Feasibility of a National Testing and Evaluation Program for Stormwater Products and Practices."

In Michigan, storm water discharges continue to contribute to water quality impairment of surface waters or inhibit surface waters from achieving their fullest water quality potential. The MDEQ recognizes that ineffective or underperforming storm water control measures (SCM) may be limiting the treatment of pollutants or contributing to water quality impacts. A national SCM testing and evaluation program would provide an opportunity to verify performance rates to ensure pollutants are addressed in accordance with the design standard and, with proper maintenance, the SCM will continue to perform in perpetuity.

The MDEQ recognizes the complex considerations that must be given to developing and implementing a national program. My staff continues to engage companies proposing emerging technologies to work towards a shared goal of improving Michigan's surface waters affected by storm water runoff. The "newness" of emerging technology has prompted storm water managers to share their concerns when considering new, uncertified technology and performance ratings from competing SCMs.

The relationship of a national program to a regulatory framework is important as the national storm water rulemaking has been delayed and the United States Environmental Protection Agency is focusing on options to strengthen control requirements. The MDEQ would review a national program giving consideration to potential state regulatory relationships. If a regulatory relationship is formed with the program via state permitting or rulemaking, it would be vitally important to have a long-term commitment to program implementation with financial sustainability.

I support implementation of the next steps toward development of a national program as recommended by the STEPP Workgroup Steering Committee. The MDEQ strives to be a leader in environmental stewardship and a partner in economic development. A national

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program would support this mission while allowing for consistency at the national level. The MDEQ appreciates the opportunity to provide comment on the white paper. We look forward to hearing the outcomes from the ongoing meetings of the STEPP Workgroup Steering Committee.

If you need additional information, please contact Ms. Christe Alwin, Municipal Separate Storm Sewer System Program Specialist, Lansing District Office, Water Resources Division, at 517-284-6656; alwinc@michigan.gov; or DEQ, P.O. Box 30242, Lansing, Michigan 48909-7742.

Sincerely,

A handwritten signature in cursive script, appearing to read "William Creal".

William Creal, Chief
Water Resources Division
517-284-5470

cc: Mr. Peter Ostlund, MDEQ
Mr. Mike Masterson, MDEQ
Ms. Christe Alwin, MDEQ