



Detroit River Public Advisory Council
PO Box 725
Trenton, MI 48183
734.675.0141

February 19, 2013

Matthew Staron
Permits Section, Water Resources Division
Department of Environmental Quality
P.O. Box 30458,
Lansing, Michigan 48909

Dear Mr. Staron:

The Detroit River Public Advisory Council (DRPAC) would like to submit the following comments for consideration on the renewal of the Detroit Water and Sewerage's request for renewal of their NPDES Permit #MI0022802:

- The Detroit River has been designated as an Area of Concern (AOC) in the Great Lakes Water Quality Agreement. It is a bi-national AOC that directly drains approximately 700 square miles of land in Michigan and Ontario, as well as the 107 square mile City of Detroit drainage area. The AOC was established due to eleven Beneficial Use Impairments (BUIs).
- CSO's directly impact the Beach Closings BUI and can be indirectly linked to the Aesthetics and Bethos BUIs. According to the delisting criteria established by the MDEQ, and accepted by the DRPAC, the Beach Closings BUI cannot be delisted until all CSOs that are causing 303(d) impairment for the Detroit River are being treated or eliminated.
- It is critical that DWSD address CSO outfalls discharging into the Detroit River in order for the Beach Closings BUI to be removed.
- We urge the MDEQ to include language in the new permit that requires the DWSD to develop and implement CSO Control Programs for outfalls discharging into the Detroit River that will meet the needs of the delisting criteria required to delist the Beach Closings BUI.

Thank you for consideration of our comments.

Sincerely,

Mary Bohling
Chair, Detroit River Area of Concern Public Advisory Council
313-410-9431

Supported and facilitated by

