



June 1, 2016

Mr. Rick Hobrla
Office of the Great Lakes
Michigan Department of Environmental Quality

RE: Michigan Beach Closing Beneficial Use Impairment

Dear Mr. Hobrla,

Members of the Bi-National Public Advisory Council (BPAC), who represent stakeholders on both the U.S. and Canadian sides of the St. Marys River, have reviewed the findings related to beach closings, as well as efforts currently underway for monitoring and infrastructure upgrades. This information was provided to BPAC in a draft BUI removal letter provided by the MDEQ.

The BUI delisting criteria most appropriate for the Michigan Side of the St. Marys River is that which pertains to waterbodies within the AOC that are on the list of non-attaining waters due to human pathogens. As such, the MDEQ criteria have established restoration of this BUI as being attained “when human sources of pathogens regulated under the National Pollutant Discharge Elimination System (NPDES) are on schedule to be controlled through implementation of permit requirements”.

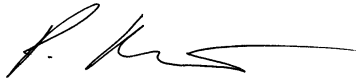
We recognize that persistent non-point sources of bacteria, attributed to a variety of factors including the presence of stormwater runoff, wildlife, agriculture, and failing septic systems, remain present within the AOC. However, we recognize that such issues are equally problematic in non-AOC areas and will need to be dealt with through long-term research and planning initiatives which are currently outside the scope of the RAP.

With respect to known sources of bacterial input due to waste-water treatment plants, we hope that the separation of the combined sewer system in Sault Ste. Marie MI (on schedule for completion by the end of 2018) will ameliorate bacterial inputs caused by the discharge of untreated, or partially-treated sewage into the St. Marys River. We further hope that discharges from the waste-water treatment plant (as upgraded) will be adequately monitored and improved as needed as a result of the City’s NPDES wastewater discharge permit which is currently in place. To

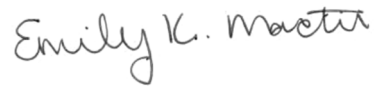
confirm the improved functionality of the waste-water treatment once the combined sewer system has been separated, BPAC recommends public communication of the post-project quality of the discharged wastewater.

As studies carried out to date have not revealed any RAP-specific issues related to the impairment of the Beach Closure BUI that will not be rectified by SSM Michigan's waste-water treatment plant upgrade currently underway, or otherwise addressed under the NPDES permitting requirement, BPAC supports MDEQ's recommendation to delist the Beach Closure BUI.

Sincerely,



Paula Antunes, Ph.D.
Canadian BPAC Chair



Emily Martin
U.S. 1st Vice Chair