



**Comments to WDNR
TMDL Guidance for MS4 Permits: Planning,
Implementation, & Modeling Guidance
Addendum A (Percent Reduction)
NEWSC Rules & Regulations Committee
November 16, 2015**

November 19, 2015

Please consider the comments below developed by the members of the Northeast Wisconsin Stormwater Consortium when finalizing the proposed TMDL Guidance for MS4 Permits: Planning, Implementation, & Modeling Guidance Addendum A (Percent Reduction).

1. **Section B. Background** - Please consider clarifying that state highway, county highway, UW campuses, etc. are assigned the same TMDL percent reductions (sediment and phosphorus allocations) as the respective city, village or town.

2. **Section C. Discussion. Second Paragraph** – As shown in the attached table, the MS4 urban areas within the Lower Fox River Basin Sub-Basins have different baseline unit area loads (lbs/acre/year) for both sediment and phosphorus.

3. **Section D. Guidance. Item 1** – As shown in the attached table, the MS4 urban areas within the Lower Fox River Basin Sub-Basins have different baseline unit area loads (lbs/acre/year) for both sediment and phosphorus.

4. **Section D. Guidance. Item 2** – As shown in the attached table, the MS4 urban areas within many of the Lower Fox River Basin Sub-Basins have higher allocated unit area loads (lbs/acre/year) for both sediment and phosphorus as compared to the urban non-regulated areas. As such, de-gradation within the water body may be a concern.
Please see attached document.

TMDL Phosphorus Yields in Lower Fox River Basin

TMDL Sub-Basins	Baseline Urban MS4 (lbs/ac/yr)	Reduction Urban MS4 (%)	Allocated Urban MS4 (lbs/ac/yr)	Allocated Urban NR* (lbs/ac/yr)	Urban Difference (lbs/ac/yr)	Comment
East River	0.64	30.0%	0.45	0.50	(0.05)	OK
Baird Creek	0.78	30.0%	0.54	0.41	0.14	Concern
Bower Creek	0.76	30.0%	0.53	0.48	0.05	Concern
Apple Creek	0.63	30.0%	0.44	0.53	(0.09)	OK
Ashwaubenon Creek	0.58	30.0%	0.40	0.34	0.07	Concern
Dutchman Creek	0.65	30.0%	0.46	0.39	0.07	Concern
Plum Creek	0.96	30.0%	0.67	0.53	0.14	Concern
Kankapot Creek	0.86	30.0%	0.60	0.44	0.16	Concern
Garners Creek	0.74	63.1%	0.27	0.23	0.05	Concern
Mud Creek	0.57	39.0%	0.35	0.73	(0.38)	OK
Duck Creek	0.55	30.0%	0.39	0.38	0.01	Concern
Trout Creek	0.39	30.0%	0.27	0.43	(0.16)	OK
Neenah Slough	0.54	30.0%	0.37	0.40	(0.02)	OK
LFR Mainstem	0.64	30.0%	0.45	0.51	(0.06)	OK
Lower Green Bay	0.66	30.0%	0.46	0.40	0.06	Concern

* Urban Non-Regulated (NR)

TMDL Sediment Yields in Lower Fox River Basin

TMDL Sub-Basins	Baseline Urban MS4 (lbs/ac/yr)	Reduction Urban MS4 (%)	Allocated Urban MS4 (lbs/ac/yr)	Allocated Urban NR* (lbs/ac/yr)	Urban Difference (lbs/ac/yr)	Comment
East River	288	40.0%	173	132	42	Concern
Baird Creek	351	40.0%	211	75	135	Concern
Bower Creek	259	40.0%	155	130	25	Concern
Apple Creek	250	40.0%	150	165	(15)	OK
Ashwaubenon Creek	198	40.0%	119	122	(3)	OK
Dutchman Creek	278	40.0%	167	86	81	Concern
Plum Creek	308	40.0%	185	182	3	Concern
Kankapot Creek	430	40.0%	258	172	86	Concern
Garners Creek	328	49.9%	164	131	33	Concern
Mud Creek	271	28.5%	194	105	89	Concern
Duck Creek	210	40.0%	126	89	38	Concern
Trout Creek	76	40.0%	46	69	(23)	OK
Neenah Slough	315	40.0%	189	171	18	Concern
LFR Mainstem	372	65.2%	130	150	(20)	OK
Lower Green Bay	243	40.0%	146	134	12	Concern

* Urban Non-Regulated (NR)

Please contact us with any questions regarding our comments.

Sincerely,



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NEWSC Member Communities

Brown County	City of Appleton	Town of Black Wolf	Village of Allouez
Calumet County	City of DePere	Town of Buchanan	Village of Ashwaubenon
Fond du Lac County	City of Fond du Lac	Town of Fond du Lac	Village of Bellevue
Outagamie County	City of Green Bay	Town of Friendship	Village of Combined Locks
Winnebago County	City of Kaukauna	Town of Grand Chute	Village of Harrison
	City of Manitowoc	Town of Greenville	Village of Hobart
UW Oshkosh	City of Marinette	Town of Lawrence	Village of Kimberly
	City of Menasha	Town of Ledgeview	Village of Little Chute
	City of Neenah	Town of Menasha	Village of North Fond du Lac
	City of Oshkosh	Town of Neenah	Village of Sherwood
	City of Two Rivers	Town of Scott	Village of Suamico
		Town of Taycheedah	