

State of Wisconsin
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October 7, 2024

Maureen McBroom
Project Manager
Watertown City
106 Jones St
PO Box 477
Watertown, WI 53094

Subject: City of Watertown Municipal Separate Storm Sewer System (MS4) – WPDES Permit
No. WI-S050075-3 – Water Quality Trading Plan – **CONDITIONAL APPROVAL**

Dear Ms. McBroom:

On behalf of the Wisconsin Department of Natural Resources (DNR), the DNR has conditionally approved the report entitled, “Watertown Waterways Improvement Program-Water Quality Trading Plan” dated August 16, 2024. The Water Quality Trading (WQT) plan from the City of Watertown (Watertown) is designed to make progress on total phosphorus and total suspended solids Rock River Total Maximum Daily Load (TMDL) Waste Load Allocations (WLAs) in accordance with MS4 permit requirements.

Based on DNR review, the final WQT plan, dated August 2024, is in general conformance with DNR Water Quality Trading guidance and s. 283.84, Wis. Stats.

The WQT plan provides that Watertown will utilize WQT to help achieve WLAs. Watertown will implement various nonpoint source practices such as: grassed waterways, buffer strips, cover crops, barnyard management, streambank stabilization, and wetland restoration as opportunities become available. Watertown will continue to add to their trading plan over multiple permit terms to generate additional credits.

The August 2024 plan specifically calls for the use of harvestable buffers on two agricultural fields located in Rock River TMDL reachshed 28, upstream of the City. Table 1 below provides the amount of credit these harvestable buffers will produce. Water Quality Trading will be implemented in addition to traditional best management practices to fully achieve the WLAs established in the TMDL.

Table 1

Pollutant	Interim Credit	Long-Term Credit
Total Phosphorus	14.8 lbs/year	58.45 lbs/year
Total Suspended Solids	2.18 tons/year	6.53 tons/year

WDNR conditionally approves the WQT plan as a basis for water quality trading during the next WPDES permit term. This approval is not to be construed as an approval for any activities requiring permit coverage under chs. 30 or 31, Wis. Stats. The DNR has assigned the WQT plan a tracking number of WQT-2024-0021 and it will be referenced as such in the MS4 General Permit at the time of reissuance. The final WQT plan will be included as part of its own public notice, and the final approval of the plan will occur upon reissuance of the MS4 GP with Watertown’s Plan referenced and incorporated therein.

The WQT plan also contemplates future trades in future permit terms. DNR review and approval is required for any modifications to the current WQT plan, including all future proposed trades and the incorporation of additional practices. In addition, requests for modification are subject to the same public notice and comment procedures used to review this application. It is incumbent upon Watertown to keep DNR informed and submit requests to update the Watertown Waterways Improvement Program-Water Quality Trading Plan when it wishes to engage in additional water quality trades.

If you have any questions or comments, please contact me at 608-445-3078 or at sean.spencer@wisconsin.gov.

Thank you,

A handwritten signature in black ink that reads "Sean Spencer". The signature is written in a cursive, flowing style.

Sean Spencer
Stormwater Specialist
Wisconsin Department of Natural Resources