



March 18, 2025

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**Subject:** Waukesha County Municipal Separate Storm Sewer System (MS4) – WPDES Permit No. WI-S050075-03 and Village of Elm Grove MS4 – WPDES Permit No. WI-S065404-02 Streambank Stabilization Water Quality Trading Plan – **CONDITIONAL APPROVAL**

Mr. Hauge:

On behalf of the Wisconsin Department of Natural Resources (Department), the Department has conditionally approved the Water Quality Trade (WQT) plan entitled, “Water Quality Trading Plan – Project located in South Playing Fields Park, Village of Elm Grove” which was revised and submitted to the Department on February 11, 2025. The WQT plan between Waukesha County and the Village of Elm Grove is intended to demonstrate progress on total phosphorus (TP) and total suspended solids (TSS) Milwaukee River Basin Total Maximum Daily Load (TMDL) Waste Load Allocations (WLAs) in accordance with MS4 permit requirements.

Based on the Department’s review, the final WQT plan, submitted on February 11, 2025, is in general conformance with WDNR Water Quality Trading guidance and s. 283.84, Wis. Stats.

The County MS4 within reachshed MN-12 discharges to Underwood Creek which in turn discharges to the Menomonee River. Therefore, to generate WQT credits, the County intends to perform streambank stabilization in South Playing Fields Park located in the Village of Elm Grove (i.e., HUC-12 #040400030404). Streambank stabilization will utilize grading and stone toe protection to prevent the erosion of sediment from the streambanks. Modeling results are provided in **Table 1**, calculated utilizing the NRCS calculator.

**Table 1.** NRCS Modeling results.

Pollutant	Bank Length	Geomean Recession* Rate (ft/yr)	Current Loading (lbs/year)	Proposed Loading (lbs/yr)	Proposed Reduction (lbs/yr)	Trade Ratio	Proposed Credits ** (lbs/yr)
TP	150	0.25	11.1	0	11.1	2:1	5.5
TSS	150	0.25	9,780	0	9,780	2:1	4,890

\*: Based on air photo review 1995-2024, average of 5 sections, and NRCS table values.

\*\* : Total credits, to be divided by Waukesha County and Village of Elm Grove.

The Department conditionally approves the WQT plan as a basis for WQT 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 Department has assigned the WQT plan a tracking number of WQT-2025-0003 and it will be referenced as such in Waukesha County's MS4 General Permit and Village of Elm Grove's Menomonee River Group MS4 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 General Permit and Menomonee River Group MS4 Permit with the WQT plan referenced and incorporated therein.

Lastly, Department 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.

If you have any questions or comments, please contact me at 414-940-9860 or [Elexius.montes@wisconsin.gov](mailto:Elexius.montes@wisconsin.gov).

Sincerely,



Elexius (Lexi) Montes  
Storm Water Specialist  
Watershed Bureau  
WDNR

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