

Attachment B

Advantages of Watershed-Based Permitting

DRAFT

**Fact Sheet: Menomonee River Watershed-Based Stormwater Permit:
*Cost-effectively achieving cleaner water***

Federal and state rules require municipalities to comply with stormwater permits in order to reduce water pollution. In the past, municipalities often worked separately to meet permit requirements. A new approach creates the opportunity to achieve large water quality benefits in a more cost effective way.

Building from an Existing Group

Eight Menomonee River watershed municipalities are currently participating in a group stormwater permit and the remaining municipalities have individual permits. As an alternative to the current group and individual permits, municipalities and key partners in the Menomonee River watershed are developing a regional stormwater permit for the entire watershed, linking governments together in an approach that more effectively targets specific water quality problems in the region. This new approach is supported by the EPA as a model for cost-effective innovation among governmental permit holders.

For municipalities, there are many benefits to participating in a watershed-based permit for the entire Menomonee River watershed, including:

- **Save taxpayer dollars** by sharing costs of regional pollution control measures that improve water quality and satisfy permit conditions for all participating municipalities, eliminating overlap of local governments in water quality efforts, and saving staff hours by issuing a single watershed-based report on public education and outreach.
- **Gain greater flexibility in achieving new Total Maximum Daily Load (TMDL) mandated pollution reduction requirements** through collaboration with neighboring municipal partners, without being restricted to pollutant trading guidelines which can place limitations on time, locations of best management practices, and accounting (trade ratios). Participating in joint permits gives governments the flexibility to meet the standards set in the new TMDLs collectively by treating the permit group as a single point source.
- **Improve water quality**, as joint permits can more effectively reduce stormwater pollution by ending the piecemeal approach to stormwater control and allowing all stakeholders in a watershed to share ideas and information.
- **Improve chances of winning grants** through collaborative projects, which are typically looked on more favorably by both public and private funders. Group permit holders will possibly receive additional points on Urban Nonpoint Source and Storm Water Management grant applications to the Wisconsin DNR.

Bottom Line: Participating in a watershed-based permit allows municipalities to more efficiently and cost-effectively achieve reductions in water pollution.

For more information, please contact Wisconsin DNR Water Resources Engineer Bryan Hartsook at 262-574-2129 or at Bryan.Hartsook@wisconsin.gov

Incentives for MS4s to Participate in a Watershed-Based Permit

- Ability to undertake collaborative watershed projects that could reduce costs to MS4s and could meet multiple individual and group permit conditions
- Flexibility in addressing total maximum daily load (TMDL) wasteload allocations in multiple-municipality stream reaches. Also, participating MS4s will be able to develop experience in collaborating on the implementation of new types of pollution controls that could be beneficial in meeting future TMDL requirements.
- Development of a joint analysis procedure for prioritizing and targeting outfalls for IDDE monitoring
- Joint report on public education and outreach
- Can address reductions in pollutant loads at a watershed level without executing water quality trades between MS4s and without accounting for trading ratios
- Options for cooperative public education and outreach (also available under a group permit)
- **Possibility** of participant(s) in a watershed-based permit receiving substantive additional points on State Urban Nonpoint Source and Storm Water Management grants
- Grant applications for collaborative projects undertaken by members of a watershed-based permit group may be assigned higher priorities by public and private grant institutions
- Reduction in transaction costs
- Cities of Milwaukee and West Allis have permit renewal dates in 2013 and would gain time to comply with total maximum daily load allocations by participating in the watershed-based permit