

Public Comments & DNR Responses
to Proposed Guidance

**TMDL Guidance for MS4 Permits:
Planning, Implementation, and Modeling Guidance
Addendum B (Internally Drained Areas)**

The DNR only received comments from the North Central Wisconsin Stormwater Coalition (NCWSC) and their comment summary is attached on the following page. Thank you for taking the time to review and comment on the proposed guidance. DNR's responses to the comments are as follows:

1. Consider adding the following definitions to paragraph D. Guidance: Add a definition of internally drained area. Add definition of surface water (non-navigable water, navigable water and wetland). Add definition of water of the state.

Response: A definition for "internally drained area" has been added to the guidance. Definitions for "navigable waters" or "navigable waterway" in s. 343.03 (7), Wis. Adm. Code, "wetlands" in s. NR 103.02 (5), Wis. Adm. Code, and "waters of the state" s. 283.01 (20) Stats, were not added to the guidance as they are contained in applicable Wisconsin Statutes and Administrative Codes.

2. Consider rewording paragraph D.1. as follows: "If an internally drained area that existed in a pre-development condition is no longer an internally drained area because it is drained by gravity in a post-development condition, then the post-developed area shall be included in the modeling."

Response: This language has been incorporated into the guidance.

3. It may be advantageous to simplify paragraphs D.3 and D.4 to read as follows: "If MS4 runoff enters an internally drained wetland or navigable water, then you should remove the catchment area from the TMDL analysis completely. Otherwise, you may include the catchment area in the modeling if the Department's 2009 internally drained guidance memo is followed."

Response: Language similar to that suggested above has been incorporated into the guidance.

The final guidance was given final approval by the Bureau Director on May 17, 2016.

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