


Fw: CARPC Public Hearing Submitted Comments

Tanya Sime <tanyas@capitalarearpc.org>

Mon 7/8/2024 12:33 PM

To: Nick Bower <nickb@capitalarearpc.org>

 1 attachments (78 KB)

20240708 Submitted Comments Eskrich CARPC.pdf;

Tanya Sime
608-474-6017

From: Sara Eskrich <sara.eskrich@gmail.com>
Sent: Monday, July 8, 2024 8:59 AM
To: Tanya Sime <tanyas@capitalarearpc.org>
Subject: CARPC Public Hearing Submitted Comments

Good morning,

I'm sorry I will not be able to join you for the public hearing on Thursday. Please find comments attached for your consideration, from my purview as a MMSD Commissioner.

Best,
Sara

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Sara Eskrich
608-669-6979

TO: Capitol Area Regional Planning Commission

FROM: Sara Eskrich, Madison Metropolitan Sewerage District Commissioner

DATE: 7/8/2024

RE: Amendment of the Dane County Water Quality Plan by Revising the Point Discharge Locations of Treated Effluent from the Nine Springs Wastewater Treatment Plant

Dear CARPC Commission:

To comply with its Wisconsin Pollutant Discharge Elimination System (WPDES) permit, Madison Metropolitan Sewerage District (the District) must achieve phosphorus compliance in Badger Mill Creek, one of its two effluent discharge outfalls, as mandated by the Wisconsin Department of Natural Resources (WDNR) and U.S. Environmental Protection Agency. Over the past six years, the District did its job and evaluated numerous compliance options, but none were as viable or impactful as the solution we have today. Revisiting those past options won't change the outcome and we need to move forward on permit renewal. *This extensive work has left us with the best path forward for the health and compliance of Badger Mill Creek, and that is to discontinue the effluent.*

Additionally, more good things are to come for Badger Mill Creek thanks to the work of the Badger Mill Creek Stakeholder Group. For nearly a year, this group, which brings together representatives from municipalities, nonprofits, Dane County, the WDNR, and the District, has been working to develop a portfolio of projects to support the health and resiliency of the creek. The District has pledged \$1 million for these projects, and I extend my appreciation to the stakeholder group participants for their work and commitment.

As a Madison Metropolitan Sewerage District Commissioner, I understand the tough choices that District staff and leadership must make, balancing regulatory requirements, community wishes, environmental health and financial considerations. Maintaining compliance with its permit is of the utmost and primary importance to all District stakeholders, and the decision to discontinue effluent return was the best option to meet the competing interests.

I also understand the challenging task before the CARPC Commission, as this request to modify a previous amendment to the Dane County Area Water Quality Plan is one of the first instances of a request to remove an effluent outfall from the plan. However, the CARPC Commission's purview in this recommendation, which was confirmed with the WDNR on May 15, 2024, is limited to water quality standards as outlined in Wis. Admin Code NR 102 to meet the requirements of Wis. Stat. S. 283.83, as they align with the waterbody's designated uses. Therefore, the water quality standards for consideration are limited to toxics, temperature, bacteria, phosphorus, dissolved oxygen, and pH—*water quantity is outside the scope of CARPC's consideration for this amendment.* As the District has outlined in its Final Compliance Alternatives Plan, its effluent impacts Badger Mill Creek in terms of toxics, temperature, phosphorus, bacteria, and dissolved oxygen, which has consequences for fish and aquatic life and human health. Eliminating the District's effluent return is a water quality win for Badger Mill Creek.

As a Commissioner, former elected official for the City of Madison, and professional in the policy world, I appreciate and understand the task presented to the District, CARPC, and the DNR. Based on the water quality standard data presented and the limited scope of this request, *I ask that the CARPC Commission approve and recommend this amendment to the Dane County Water Quality Plan to the Wisconsin Department of Natural Resources.*

Please let me know if you have any questions for me or our capable District staff. Thank you for your consideration and for your service to our community.

Best,

Sara Eskrich