


## Fw: Comments on MMSD request to amend Dane County Water Quality Plan

Tanya Sime <tanyas@capitalarearpc.org>

Wed 7/10/2024 3:05 PM

To: Nick Bower <nickb@capitalarearpc.org>

 1 attachments (138 KB)

City of Madison CARPC Comments 7.10.24.pdf;

Tanya Sime  
608-474-6017

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**From:** Fries, Gregory <GFries@cityofmadison.com>

**Sent:** Wednesday, July 10, 2024 2:43 PM

**To:** Tanya Sime <tanyas@capitalarearpc.org>; Jason Valerius <jasonv@capitalarearpc.org>

**Cc:** Ericd@madsewer.org <Ericd@madsewer.org>; Amanda Wegner <amandaw@madsewer.org>; Schmidt, Janet <jschmidt@cityofmadison.com>; Wolfe, James <JWolfe@cityofmadison.com>; Christie Baumel <cbaumel@cityofmadison.com>

**Subject:** Comments on MMSD request to amend Dane County Water Quality Plan

Hi Jason/Tanya,

Attached please find the City of Madison's comments on the MMSD request coming before CARPC tomorrow.

Thanks much.  
Greg



## Office of the Mayor

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To: Capital Area Regional Planning Commission

Date: July 10, 2024

RE: Madison Metropolitan Sewerage District request to modify the Dane Co Water Quality Plan

Dear Commissioners,

Thank you for this opportunity to comment on the Madison Metropolitan Sewerage District (MMSD) request to modify the Dane County Water Quality Plan by discontinuing the return effluent discharge to Upper Badger Mill Creek. The City of Madison supported this decision at the MMSD Commission level and continues to support this action.

I am writing as a representative one of the District's ownership communities, representing approximately 66% of its customer base. The City works closely with MMSD, with attention to their service reliability and regulatory compliance, costs of services impact to our residents and businesses, and impacts to the environment, and have considered all of these factors in my recommendation.

We have reviewed the options available to MMSD to meet State water quality standards in its effluent discharge to Badger Mill Creek. After a careful review of the analysis and consultation with numerous stakeholders, I understand the pros and cons of each available option, and I understand there are regulatory conditions that shape both the options available to consider.

I want to clarify that I am primarily considering a choice between the options of diverting the effluent from Badger Mill Creek and tertiary treatment at the plant with continuation of the return to Badger Mill Creek. The City of Madison, like MMSD, looked at options for adaptive management in this watershed, and inquired about creative ways to achieve phosphorous compliance through adaptive management. Ultimately, we agree with MMSD that this is not a viable option.

The cost differential between the proposed alternative and building new tertiary treatment is approximately \$24 million. There is an additional long-term cost of approximately \$50 million (net present value) to replace the aging effluent main transporting the effluent to Badger Mill Creek. Residents and businesses from the City of Madison would bear 66% of these costs, given the proportional share of MMSD's customer base. The associated rate increase from this project would be in addition to the double-digit rate increases MMSD anticipates each year for the next 10 years. As Mayor of Madison, it is my responsibility to carefully consider the impacts primarily to Madison residents.

Given these limitations, Madison continues to believe the best option for MMSD, and its ownership communities, is to discontinue the return of effluent to Badger Mill Creek, and instead discharge it into Bad Fish Creek where adaptive management is a viable option for phosphorus management. I believe this

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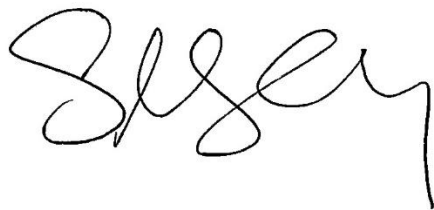
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is the most fiscally responsible decision, given that the stream conditions in Badger Mill Creek have improved due to many other factors since the original effluent return started in the 1990's. The stream is now viable without the return effluent; however, we also recognize that improvements may still be necessary to ensure the long-term health of Badger Mill Creek, especially during dry years. MMSD has already made a commitment to participate in projects to help make improvements, and discussions are continuing to identify some potential improvements and additional solutions. We encourage all stakeholders, including MMSD, to continue that partnership, and Madison will remain a dedicated partner throughout those discussions.

Before closing, I will also briefly acknowledge other considerations that Commissioners may be weighing. Regarding the impact to Bad Fish Creek, based on data provided by MMSD, it's our understanding that the redirected effluent, in combination with the existing effluent to Bad Fish Creek, would be at a discharge level that is still lower than pre-pandemic conditions and would remain within MMSD's permitted discharge amount. Among many other factors when considering the impacts of climate change, Madison recognizes the importance of being mindful of energy consumption. With that in mind, it's also worth noting that a tertiary treatment option would also have some likely negative outcomes from an operational energy consumption perspective.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "SRConway". The signature is fluid and cursive, with a long vertical stroke at the end.

Satya Rhodes-Conway  
Mayor