



August 10, 2023

Mr. Timothy R. Asplund
Monitoring Section Chief
WDNR – Bureau of Water Quality
101 S. Webster Street
Madison, WI 53707-7921

RE: Water Quality Management Letter for Sewer Service Area Amendment Request #2306 –
Stoughton USA (City of Stoughton)

Dear Mr. Asplund:

The City of Stoughton has submitted a request for a sewer service area amendment to the *Dane County Water Quality Plan*. The proposed amendment area is currently in the City of Stoughton, Town of Dunn, and Town of Pleasant Springs, in the Lake Kegonsa-Yahara River (HUC 12: 070900020902) and City of Stoughton-Yahara River (HUC 12: 070900020903) subwatersheds. It includes the addition of approximately 279 acres of land, including approximately 8 acres of existing development and 99 acres of proposed environmental corridors, for a net of approximately 172 developable acres to the Stoughton Urban Service Area. A public hearing was held on the proposed amendment at the July 13, 2023, Regional Planning Commission meeting. The City's application and the Commission staff's analysis report of the proposed amendment have been submitted to the Department's Surface Water Integrated Monitoring System.

It is the Capital Area Regional Planning Commission staff's opinion that the proposed amendment is consistent with water quality standards under Wis. Stat. § 281.15, and the adopted Policies and Criteria for the Review of Sewer Service Area Amendments to the *Dane County Water Quality Plan*, by meeting state and local requirements. In addition to the existing state and local requirements, the City of Stoughton and development team have agreed to pursue additional water resource management measures for the amendment area, identified below. Additional actions have also been recommended below to further improve water quality and environmental resource management.

At our August 10, 2023, meeting, the Capital Area Regional Planning Commission voted to recommend approval of this amendment to the Wisconsin Department of Natural Resources in recognition of the state and local requirements for the following:

1. State and local review and approval of stormwater management plan(s) is required, including Regional Planning Commission staff review and approval as part of the sewer extension review process.

- a. Stormwater and erosion control practices are required to be installed prior to other land disturbing activities. Infiltration practices are required to be protected from compaction and sedimentation during land disturbing activities.
 - b. Peak rates of runoff are required to be controlled for the 1-, 2-, 10-, 100-, and 200-year, 24-hour design storms to pre-development levels, in accordance with the City of Stoughton and Dane County Stormwater Ordinances.
 - c. Sediment control is required to achieve at least 80% sediment control for the amendment area based on the average annual rainfall period, with sediment control pretreatment occurring prior to infiltration for runoff from parking lots and new road construction within commercial, industrial, and institutional land uses, in accordance with the City of Stoughton and Dane County Stormwater Ordinances.
 - d. Runoff volume control is required to maintain the post-development stay-on volume to at least 90% of the pre-development stay-on volume for the average annual rainfall period, without exemption for the area within a closed basin watershed, in accordance with the City of Stoughton and Dane County Stormwater Ordinances.
 - e. For areas within a closed basin watershed, it is required to provide adequate storage capacity for back-to-back 100-year, 24-hour storms, a stable overflow outlet, and an emergency drawdown or pumping plan, in accordance with the City of Stoughton and Dane County Stormwater Ordinances.
 - f. Maintain predevelopment groundwater recharge rates from the Wisconsin Geological and Natural History Survey's 2012 report, "*Groundwater Recharge in Dane County, Wisconsin, Estimated by a GIS-Based Water-Balance Model*", for the amendment area (a range of 9 to 10 inches/year) or by a site-specific analysis, when required by the City of Stoughton and Dane County Stormwater Ordinances.
 - g. Oil and grease control are required to treat the first 0.5 inches of runoff using best management practices at commercial and industrial sites and any other uses where the potential for pollution by oil or grease, or both, exists, in accordance with the City of Stoughton and Dane County Stormwater Ordinances.
2. Easements and perpetual legal maintenance agreements with the City, to allow the City to maintain stormwater management facilities if owners fail to do so, are required for any facilities located on private property.
 3. Environmental Corridors are required to be delineated to meet the Environmental Corridor Policies and Criteria adopted in the *Dane County Water Quality Plan*.

In addition to the existing state and local requirements, the City of Stoughton and development team have agreed to pursue the following water resource management measures for the amendment area:

1. Provide post-development infiltration (stay-on) volume of 100% of the pre-development infiltration (stay-on) volume for the average annual rainfall period.
2. Provide post-development runoff volume control for the 1-, 2-, 10-, 100-, and 200-year, 24-hour design storms (using NRCS MSE4 storm distributions) to match pre-development runoff volumes. *For the area east of USH 51*, provide post-development runoff volume control to reduce the pre-development runoff volumes by 10%.
3. Pursue restoration or improvement of the wetlands located in the area east of USH 51 (not those which receive a DNR exemption or fill permit) to create an amenity for the surrounding development.

It is also recommended that the City of Stoughton pursue the following to further improve water quality and environmental resource management:

1. Continue to participate in regional water quality initiatives including Wisconsin Salt Wise, the Madison Area Municipal Storm Water Partnership, and Yahara WINs.
2. Encourage the removal and control of invasives and the use of native flora favored by the Rusty Patched Bumble Bee in landscaping to provide suitable habitat for this pollinator, where appropriate, for the portion of the amendment area within the High Potential Zone for the federally endangered Rusty Patched Bumble Bee.
3. Request a formal Endangered Resources Review by the WDNR or one of their certified reviewers for potential impacts to endangered resources like rare plants, animals, and natural communities, and take necessary habitat protection measures if species are found, based on the results of screening conducted.

If you have any questions regarding this matter, please do not hesitate to contact Nick Bower, the Commission's Environmental Engineer.

Sincerely,



David Pfeiffer
Executive Chairperson



Kris Hampton
Secretary

cc: Mr. Rodney Scheel, Director of Planning & Development, City of Stoughton

