



May 1, 2020

Peter Riggs – Director of Public Works
City of Burlington Department of Public Works
2200 S. Pine St.
Burlington, WI 53105

Subject: City of Burlington (WPDES Permit No. WI-0022926)
Adaptive Management Plan – Conditional Approval

Dear Mr. Riggs:

The Wisconsin Department of Natural Resources (WDNR) has received the final draft of the Adaptive Management (AM) Plan prepared by Baxter and Woodman Consulting Engineers on behalf of the City of Burlington. The most recent plan was submitted in early April 2020 and considered comments provided on the initial draft from 2019. The Department has reviewed the AM plan and has no additional comments at this time.

Based on the WDNR's review, the AM Plan is in general conformance with the WDNR Adaptive Management Guidance and requirements contained in s. NR 217.18, Wis. Adm. Code. The plan indicates that the City will utilize AM to comply with the effluent limitations for total phosphorus for their discharge from the City of Burlington Wastewater Treatment Plant, Outfall 001, to the Fox River. Actions outlined in the AM plan involve nonpoint phosphorus reductions throughout the four local HUC 12 Watersheds that fall within the City of Burlington, identified as the AM plan's action area. For continued AM eligibility, phosphorus reductions undertaken by the City and various AM partners are expected to offset the WWTP's proportional phosphorus loading to the Fox River, 512 lbs/yr, within the first permit term.

The WDNR conditionally approves the AM Plan as a basis for phosphorus compliance during the next WPDES permit term. The WDNR has assigned the AM plan a tracking number of WQT-2020-0008 and will be referenced as such in the draft WPDES permit. The draft permit will contain an interim limit for phosphorus and reporting requirements consistent with s. NR 217.18, Wis. Adm. Code. The final AM plan will be included as part of the public notice package for permit reissuance, and final approval is subject to public comment and EPA review.

The WDNR appreciates your interest in watershed-based phosphorus compliance. If you have any questions or comments, please contact me at [office (414) 263-8623] [mobile (414) 399-3039] or nicholas.lent@wisconsin.gov.

Thank you,

Nick Lent
Wastewater Engineer
Wisconsin Department of Natural Resources

e-CC: Donny Hefty – Burlington
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Joe Marchese – Baxter & Woodman