State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
1300 W. Clairemont Avenue
Eau Claire, WI 54701

Tony Evers, Governor
Preston D. Cole, Secretary
Dan Baumann, Regional Director
Telephone (715) 839-3700
FAX (715) 839-6076

July 31, 2020

Matt Nelson, Commission Chair
Eleva Strum Joint Sewerage Commission
202 5th Ave. S.
Strum, WI 54770

Subject: Eleva Strum WPDES Permit #WI-0064998
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Nelson:

Thank you for submitting the recent amendment to WQT-2019-0016 for the Eleva Strum Joint Sewerage Commission. The final documentation was received on July 15th, 2020. After review of the additional documentation and final report, the Department has no comments at this time.

Based on the WDNR review, the WQT Plan is in general conformance with the WDNR Water Quality Trading Guidance and Wis. Stat 283.84. The WQT plan indicates that the Eleva Strum Joint Sewerage Commission will utilize Water Quality Trading to comply with the effluent limitations for TP for their discharge to the Buffalo River through water quality trading credits generated from streambank stabilization projects. The table below summarizes the total proposed phosphorus credits. These credits are generated and expire on a calendar year basis.

Project	Status	Date of Completion	2020	2021-2025**
Below Dam-South Side	Complete	November 2017	5.6	5.6
Below Dam-North Side	Complete	November 2019	16.0	16.0
Parking Lot	Complete	November 2019	4.5	4.5
Crystal Lake Campground	Incomplete	October 2020	12.3*	49.1
Kinville & Crawford-Hwy 10	Incomplete	October 2020	40.6*	162.5
Total			**79 lbs/yr**	**238 lbs/yr**

*Prorated credits available for 2020, contingent upon the installation of final projects by October 1st, 2020.
**In the event that this permit is not reissued prior to the expiration date, 238 lbs/yr of credits will be available in subsequent year(s).

The WDNR conditionally approves the WQT Plan as a basis for water quality trading during the WPDES permit term. Because this amendment to the WQT Plan is within the permit term, a modification to the permit and a public notification period is also required. The WDNR has assigned the WQT plan a tracking number of **WQT-2019-0016 (December 2019)** and **Amendment 1 (July 2020)** which will be referenced as such in the modified WPDES permit.

If you have any questions or comments, please contact me at 715-225-4705 or at benjamin.hartenbower@wisconsin.gov

Sincerely,

Benjamin Hartenbower, P.E.

CC (email): Brad Olson, OIC, Eleva Strum Joint Sewerage Commission
Mike Davy, Davy Engineering
Brice Nelson, Davy Engineering
Matt Claucherty, WDNR
Geisa Thielen, WDNR
Angela Parkhurst, WDNR
Jarrod Nelson, WDNR