

August 2, 2018

Teresa Withee, Clerk, Treasurer
City of Brodhead
1111 W. 2nd Ave
Brodhead WI 53520

Subject: City of Brodhead WPDES Permit #WI-0021903
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Ms. Withee:

The Department received the final Water Quality Trading (WQT) Plan on behalf of the City of Brodhead. The initial plan was received in July 2017 and additional items were received on April 2, 2018 and June 11th, 2018. The Department has reviewed the additional documentation and final report and has no additional 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 Brodhead will utilize Water Quality Trading to comply with the effluent limitations for TP for their discharge to the Sugar River through a combination of barnyard improvements, field practices and streambank restorations. The WQT Plan proposes the generation of a range of 79.5 lbs/yr to 394.3 lbs/yr of phosphorus credits for the next five years.

Additional Permits – Conditional approval of the Water Quality Trading Plan does not affect or grant approval of any other Department, Federal or Local permits that maybe necessary in order to install the anticipated nonpoint source practices. If during the permitting process, any details that were previously modeled as part of the WQT plan change, the WQT plan is no longer considered valid and will need to be resubmitted for approval. Amendments to the plan affecting the availability of credits or executed trade agreements following the effective date of the permit will then need to be incorporated into the WPDES permit via permit modification.

The WDNR conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. The WDNR has assigned the WQT plan a tracking number of WQT-2018-0007 and will be referenced as such in the draft WPDES permit. The final WQT plan will be included as part of the public notice package for permit reissuance. The draft WPDES permit will include a requirement for an annual trading report and effluent monitoring. WDNR will review the data provided by Brodhead to assess whether any additional modifications to the WQT Plan and associated water quality trades are required prior to reissuance of the next WPDES permit.

If you have any questions or comments, please contact me at 262-574-2135 or at amy.garbe@wisconsin.gov.

Thank you again,


Amy Garbe, P.E.
Wastewater Engineer
Wisconsin Department of Natural Resources

CC. Rich Vogel – City of Brodhead
Andrew Skog – MSA Professional Services