



November 7, 2025

Mike Gilbertson  
Madison Metropolitan Sewerage District  
1610 Moorland Road  
Madison, WI 53713

Subject: Madison Metropolitan Sewerage District - WPDES Permit WI-0024597-10  
Adaptive Management Plan – CONDITIONAL APPROVAL

Dear Mr. Gilbertson:

The Department recently received a final draft of the Yahara WINS Adaptive Management Plan (AM plan) prepared by Madison Metropolitan Sewerage District (District) staff. The final AM plan, dated September 2025, was received via electronic submittal on November 4, 2025. The Department has reviewed the AM plan and has no additional comments at this time.

Based on the WDNR review, the AM plan is in general conformance with the Department's Adaptive Management Guidance and requirements contained in s. NR 217.18, Wis. Adm. Code. The AM plan indicates that the District, along with other signatories to the Yahara WINS Intergovernmental Agreement, will utilize adaptive management to comply with the effluent limitations for total phosphorus for their discharges located in the Yahara River Watershed. Actions outlined in Section 3 of the AM plan involve nonpoint phosphorus reductions throughout the Yahara River Watershed, identified as the AM plan's action area.

The proposed project duration spans four permit terms, one of which is completed. The project duration may be adjusted per the provisions of s. NR 217.18 and s. 283.13(7) Wis. Stats. Based on the milestones found within the AM Plan, phosphorus reduction goals are as follows:

Permit Term 2 – 65,824 lbs/yr  
Permit Term 3 – 93,250 lbs/yr  
Permit Term 4 – 109,706 lbs/yr

The Department 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 AM-2025-02 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.

If you have any questions or comments, please contact me at (608) 400-5596 or at [matthew.claucherty@wisconsin.gov](mailto:matthew.claucherty@wisconsin.gov).

Thank You,

Matt Claucherty, Phosphorus Implementation Coordinator  
Bureau of Water Quality

e-CC:

Kathy Lake, MMSD  
Martin Griffin, MMSD  
William Walker, MMSD  
Eric Dundee, MMSD  
Vanessa Wishart, Municipal Environmental Group  
Sarah Donoughe, WDNR  
Ashley Brechlin, WDNR  
Alix Burke, WDNR  
Kate Hanson, WDNR  
Kari Fleming, WDNR  
Lisa Creegan, WDNR