



January 12, 2024

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 #2309 – Verona USA (City of Verona – “Epic Campus 6 and 7 Expansion”)

Dear Mr. Asplund:

The City of Verona has submitted a request for a sewer service area amendment to the *Dane County Water Quality Plan*. The proposed amendment is currently in the City of Verona, in the Headwaters Sugar River (HUC 12: 070900040202) and Badger Mill Creek (HUC 12: 070900040201) watersheds. It includes the addition of approximately 264 acres of land, including approximately 39 acres of existing development and right-of-way and 42 acres of proposed environmental corridors, for a net of approximately 183 developable acres to the Verona Urban Service Area. A public hearing was held on the proposed amendment at the December 14, 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 Verona 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 January 11, 2024, 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 runoff rate control is required for the 1-, 2-, 10-, 100-, and 200-year, 24-hour design storms to limit post-development runoff to “pre-settlement” levels, in accordance with the City of Verona Stormwater Ordinances. This requirement is equally, or more, protective than those required by the Dane County Ordinance.
 - 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 Verona and Dane County Stormwater Ordinances.
 - d. Runoff volume control is required to maintain the post-development infiltration (stay-on) volume to at least 90% of the pre-development infiltration (stay-on) volume for the average annual rainfall period, in accordance with the City of Verona and Dane County Stormwater Ordinances.
 - e. Maintain predevelopment groundwater recharge rates from the WGNHS 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 13 inches/year) or by a site-specific analysis, when required in lieu of meeting stay-on standards in accordance with the City of Verona and Dane County Stormwater Ordinances.
 - f. Thermal control is required to reduce the temperature of stormwater runoff from development sites within thermally sensitive watersheds, in accordance with the City of Verona and Dane County Stormwater Ordinance.
 - 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 Verona 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*.

Mr. Timothy R. Asplund

January 12, 2024

Page 3

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

1. Seek to provide volume control to maintain post-development infiltration (stay-on) volume to 100% of the pre-development infiltration (stay-on) volume, which accounts for existing areas of retention, for the average annual rainfall period, where feasible.
2. If the northeastern amendment area (area of the former quarry) develops in the future, require that the lowest opening elevation of buildings be set a minimum of two feet above the water level for back-to-back 100-year, 24-hour design, storm events and that an emergency outlet (gravity or pumping) be provided to the Dry Tributary to Badger Mill Creek.

It is also recommended that the City of Verona 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 (MAMSWaP), and Yahara WINS.
2. Continue using best management practices for salt application on all private drives, parking lots, and sidewalks within the Epic Campus. If not already doing so, the Developer is encouraged to collaborate with Wisconsin Salt Wise and encourage any contracted private winter maintenance professionals to attend the winter salt certification classes offered by Wisconsin Salt Wise.
3. Pursue restoration or improvement of the wetlands which are associated with an intermittent tributary to Sugar River (located in the southwestern edge of amendment area) to create an amenity for the surrounding development.
4. 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 entire amendment area within the High Potential Zone for the federally endangered Rusty Patched Bumble Bee.
5. Based on the Endangered Resources Review conducted on September 25, 2023, by the WDNR (ERR Log # 23-660), take necessary protection and mitigation measures identified for the 5 species with recommended actions.

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

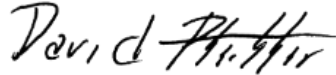
Sincerely,

Mr. Timothy R. Asplund

January 12, 2024

Page 4

David Pfeiffer



Executive Chairperson

Kris Hampton



Secretary

cc: Ms. Katherine Holt, Community Development Specialist, City of Verona

