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Phosphorus
Division of Intergovernmental Relations
Wisconsin Department of Administration
P.O. Box 8944, Madison, WI 53708-8944

Comments on the Determination by DOA and DNR for the Multi-Discharger Variance

I am the Wastewater System Manager for the Village of Plover. I am also the President of the Wisconsin River Discharger Group. The WRDG is a group of 20 municipalities in the Wisconsin River watershed that have joined together to monitor and address the impacts of the extremely low phosphorus discharge limits that will be imposed in the next few years.

Our member communities include Baraboo, Elroy, the Lakeland Sanitary District in Minocqua, Marathon City, Marshfield, Mauston, Necedah, Nekoosa, New Lisbon, Plover, Port Edwards, Portage, Rhinelander, the Rib Mountain Metropolitan Sewerage District, Stevens Point, Tomah, Tomahawk, Wausau, Whiting and Wisconsin Dells/Lake Delton. These communities represent over 182,000 residents in the Wisconsin River basin.

I spoke in favor of the Multi-Discharger Variance at the public hearing in Rothschild, but my comments were limited by the time allowed. Following are my full comments on the variance.

Point sources have achieved significant reductions in the amount of phosphorus delivered to Wisconsin River system since 1992. Currently point sources contribute about 20% of the total P load to the Wisconsin River. The remaining phosphorus is delivered by non-point sources.

Our members are committed to reducing their discharge level and meeting their obligations under current and upcoming dictates. Unfortunately, this will come at a great financial burden for our communities and result in little or no improvement of the water quality in the Wisconsin River basin.

The report estimated the costs to meet the proposed limits for POTW's at $ $7B, statewide. The capital costs used in the variance request are very conservative and underestimate the financial burden for municipal dischargers. The actual financial impact will be higher.

A review of the costs listed in the Addendum to Economic Impact Analysis, finds that capital costs attributed to more than 60% of our member communities appear to be underestimated. For example, Plover is anticipating costs in the $4M - $5M range in our long range plan. Appendix G lists our capital costs at $714,352. Two other member communities, Wausau and Portage, are listed as having no capital costs and no increased operating costs to meet anticipated limits, which is not realistic.

As noted several time at the public hearing, the cost estimates do not include site specific costs for individual facilities. While those costs are beyond the scope of a study of this nature, they are very real and will add to the capital costs already projected for the dischargers.

Meeting the proposed limits involves more than just "turning up" the removal process. The costs will involve purchasing and installing technologies that have not been implemented on a full scale basis. There is a great deal of uncertainty as to whether the technologies can meet the proposed limits on a dependable and continuing basis. The stepped reduction of the limits over a 20 year period will allow the time to determine which technologies are effective, dependable, and cost effective.

The sources of 80% of the phosphorus in the Wisconsin River System are beyond the reach of the enforcement mechanisms applied to point source dischargers.

The most effective strategies for improving water quality will involve engaging non-point sources and implementing effective controls to reduce the phosphorus load.

DNR's existing implementation options allow for and encourage this strategy. Unfortunately our members may not be able to use these strategies due to inherent limitations and restrictions. Many communities that might take advantage of these strategies simply do not have the manpower resources to implement them.

For example, the adaptive management option is not available to the Plover Wastewater Utility, leaving trading as the only viable watershed option available. The concept of trading seems straightforward, but the implementation of trading is very murky and undefined. There is far more uncertainty than answers at this time.

This variance creates a streamlined framework that channels funds for pollution prevention to sites where it can most effectively reduce phosphorus discharge and improve water quality while easing the disproportionate burden on point sources and municipal storm sewer systems. The framework still requires real and substantial reductions by point sources over the course of the variance.

I strongly encourage you to approve the variance framework which gives our communities another option to meet their obligations to improve the water quality of the Wisconsin River and its tributaries.

On behalf of the Village of Plover, the Wisconsin River Discharger Group, and the 182,000 residents we represent, thank you for the opportunity to testify today.

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