



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

June 11, 2015

RE: Public Comments on the Economic Impact Analysis

To whom it may concern:

On behalf of our Cheese, Dairy, Food, Beverage, Paper Mill, and Municipal clients throughout the State of Wisconsin, Symbiont would like to express support in favor of the conclusions expressed in the Economic Impact Analysis and for the State Wide Variance from Water Quality Based Effluent Limits (WQBELs) for phosphorus. Symbiont is a leading environmental consulting firm that has been providing support to many clients throughout the State of Wisconsin as they try to understand the impact of the new regulations. In all cases, the cost of compliance is extremely high, and as stated in the Economic Impact Analysis, has caused private clients to consider alternatives to production expansions and facility improvements. The variance offers private and public clients alike another option for addressing water quality issues.

Perhaps lost in the analysis of the variance is what we believe to be the most important component toward achieving clean waters throughout the State is the fact that the variance offers a framework for funding watershed improvements. Most of the water impact analysis through the State concludes that non-point sources are responsible for the majority of phosphorus that flows into surface waters. The current Wisconsin Administrative Code requirements do little to address this major source of phosphorus water pollution. Implementation plans based on Total Daily Mass Load calculations for watersheds, such as the Rock River, have no chance of success without significant reductions of non-point sources. The variance provides a major first step toward addressing non-point source phosphorus by creating funding sources devoted directly to watershed improvements. It cannot be understated just how significant this fact is toward the State's goal of clean waters. Many studies have shown that the cost to reduce phosphorus runoff throughout a watershed is many times lower than the cost to remove phosphorus from point sources. Providing a funding mechanism that is devoted directly to non-point source reductions is a critical step that makes economic sense at a time when funds for such projects are difficult to find.

The consequences identified by the Economic Impact analysis in lost jobs, population decline, and financial burdens is much too high a price to pay to comply with regulations that do little to actually address the majority of the phosphorus problem. Supporting the variance that provides private and public clients the chance to make real changes that benefit the State is the right thing to do.

Sincerely,

SYMBIONT®



Thomas C. Bachman, P.E.
Vice President