



January 29, 2021

Gary Gundlach, Village President  
Village of Wauzeka  
PO Box 344  
Wauzeka, WI 53826

Subject: Village of Wauzeka WPDES Permit #WI-0022276  
Water Quality Trading Plan – CONDITIONAL CREDIT CERTIFICATION

Dear Mr. Gundlach:

Thank you for submitting the final draft of the Water Quality Trading (WQT) Plan. The final documentation was received on November 25, 2020. 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 WDR grants a conditional certification of the credits with the credits becoming certified once verification has been received that the ponds and streambank stabilization project have been installed and constructed per the design in the WQT Plan and meet the applicable technical standards.

The WQT Plan indicates that the Village of Wauzeka will utilize Water Quality Trading to comply with the effluent limitations for TP for their discharge to the Kickapoo River. The WQT Plan proposes to utilize two wet detention ponds and streambank stabilization for the generation of 236.1 lbs./yr. of phosphorus credits. These credits will be used for compliance with the WPDES permit effluent limits. The table below summarizes the total generated phosphorus credits. These credits are generated and expire on a calendar year basis.

Project	Reductions (lbs./yr.)	Trade Ratio	Credits*
Wet Detention (Pond #1)	172	2.1:1	81.9
Wet Detention (Pond #2)	222	2.1:1	105.7
Streambank Stabilization	97	2:1	48.9
<b>Total</b>			<b>236.1 lbs./yr.</b>

\*In the event that this permit is not reissued prior to the expiration date, 236.1 lbs./yr. of credits will be available in subsequent year(s).

The WDNR certifies the credits in this WQT Plan as a basis for water quality trading during the WPDES permit term. Please note that the credits generated by ponds 1 and 2 are based on the current agricultural management of the tributary areas. Changes in management, including cropping and tillage practices, that differ from those documented within the SnapPlus model, will require an evaluation to ensure that the changes do not impact the number of credits generated.

The maintenance plan for the ponds should be consistent with the requirements outlined in the Wisconsin Department of Natural Resources Technical Standard 1001 but may require more frequent inspections and removal of accumulated sediment given that these ponds treat agricultural areas, which may receive more significant sediment and phosphorus loadings than ponds treating similarly sized urban watersheds. The WDNR concurs that at a minimum the ponds should be inspected monthly and following heavy rain events. The use of wet detention basins to treat agricultural runoff has shown mixed results with ponds often becoming sources of phosphorus if the phosphorus laden sediment is not regularly removed. Excessive growth of algae in the ponds

and sediment accumulation above the sediment storage depth could be indications that phosphorus leaching could be occurring and that the pond requires corrective action. Failure to maintain the ponds will negatively impact their treatment ability and will reduce the amount of credits being generated.

Construction of ponds and streambank stabilization projects may require Chapter 30 permits; this letter does not confer coverage under these permits. Ponds connected through waterways and with permanent pools often require Chapter 30 permits. The WDNR requires a copy of the record drawings to ensure that the ponds and streambank stabilization project are installed and constructed per the design and meet the applicable technical standards.

The WDNR has assigned the WQT Plan a tracking number of WQT-2021-0002 which 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 the Village of Wauzeka 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. Any modifications to the WQT Plan within the permit term will also require a modification to the permit and a public notification period.

Please feel free to contact Kevin Kirsch ([kevin.kirsch@wisconsin.gov](mailto:kevin.kirsch@wisconsin.gov)) with any questions regarding the certification of the credits, submittal of record drawings, or clarifications regarding this letter.

Sincerely,



Kevin Kirsch, PE  
Water Resource Engineer  
Wisconsin Department of Natural Resources



Benjamin Hartenbower, PE  
Water Resources Engineer  
Wisconsin Department of Natural Resources

CC (email): Jordan Fure, Delta 3  
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