

WI River Basin TMDL Modifications, Comments, and Clarifications

Modifications and Comments

A preliminary public comment period for the draft Wisconsin River TMDL report ran from February 21, 2018, through April 23, 2018. The Wisconsin Department of Natural Resources (WDNR) received 63 comments. These comments, along with responses, are summarized in Appendix P. Many comments were addressed with text edits in the report; however, some comments necessitated re-running the allocation database. Facilities will mostly see slight (approx. 1%) increases in allocations.

Because of the size and complexity of the document, we were unable to create a *.pdf that shows the changes between the current and previous versions of the report; however, below is a summary of changes that have been made:

- 1) Updated Elroy baseline flow to 0.333 MGD.
- 2) Updated Foremost Farms Plover baseline flow for Outfall 002 to 0.384 MGD. No changes to Outfall 001.
- 3) Updated Rib Mountain baseline flow to 4.41 MGD
- 4) Removed Bluff View Sanitary District from TMDL analysis; they no longer have a surface water discharge.
- 5) Re-calculated allowable loads for subbasins with low-strength wastewater dischargers.
- 6) Re-distributed allocations after bias-correcting Mill Creek phosphorus loads and:
 - a. Combined subbasins 147 and 331 to account for the limited aquatic life (LAL) classification. Phosphorus criteria should have only been applied at the bottom of subbasin 331, and not subbasin 147.
 - b. Updated the TMDL database code to check for any additional LAL reaches (other than Mill Creek). Mill Creek is the only LAL classified reach that required adjustment.
 - c. Re-calculated allocations in the database, resulting in higher allocations (approximately 1% for most facilities). This is mostly because of the bias correction adjustment on Mill Creek.
- 7) Re-ran allocation database and updated associated tables in Appendices J and K. Also adjusted formatting of the allocation tables to account for formatting requests we received.
- 8) Recalculated local versus downstream allocations and moved this into Appendix O. The wrong number was extracted from the allocation database for the “Local Wasteload Allocation.” This has been corrected. In many cases, the local allocation will be larger than the final wasteload allocation. This is because the local allocation needed to be reduced to meet water quality criteria for the downstream reservoirs. Please see Appendix O for details.
- 9) Appendix N was created, providing the agricultural load allocation as an edge of field number expressed in same manner as the implementation model SnapPlus. This analysis was done to help aid nonpoint implementation and better inform point source compliance options. The edge of field “TP Targets” were created by translating the watershed model used in the TMDL (SWAT) into inputs used in the SnapPlus model. SnapPlus was run 36,296 times to create the tables in Appendix N.

- 10) Created a trading and adaptive management appendix (Appendix O), identifying for each facility the downstream reservoir used for allocations, the maximum number of credits that can be obtained from downstream sources, and outlines the deliver factors needed for the reservoirs. A significant change is that the target concentration for the adaptive management option is given for each subbasin. Instead of the compliance point for adaptive management being the attainment of water quality criteria in the downstream reservoir, a facility interested in engaging in adaptive management need only address the target concentration for its respective subbasin. This should make adaptive management a more accessible compliance strategy. The target concentration is the concentration needed, for that subbasin, to meet water quality criteria in the reservoirs based on the allocation method employed in the TMDL.
- 11) Designated protection waters that are covered by TMDL. The TMDL covers both impaired waters and waters that are currently not listed as impaired. Waters that are not listed as impaired needed to be identified as being covered under a protection plan. Identification of protection water is a new US EPA requirement stemming from their tracking database; however, it allows Wisconsin to take credit for protecting waters and avoiding potential future impairment listings in the basin.

Clarifications

- 1) TMDLs provide the allocations necessary to meet water quality standards. Implementation of the TMDL occurs through existing rules and WPDES permits. TMDLs cannot modify these programs; any changes to these programs need to be done through procedures such as rule making or permit modification.
- 2) The TMDL report includes allocations for both the current criteria and the recommended SSC criteria. If the recommended site-specific criteria (SSC) are adopted by rule, the allocations that correspond with the SSC will replace the allocations based on the current criteria. Permittees and stakeholders will be notified if this occurs and permits will be modified.

The recommended SSC for Lakes Wisconsin, Petenwell, and Castle Rock recommend changes to the current phosphorus criteria. TMDL analysis concluded that the current statewide phosphorus criteria for Petenwell Lake and Castle Rock Lake are more restrictive than needed to protect the designated uses, and that the current phosphorus criterion for Lake Wisconsin is not sufficiently protective of the designated uses. The designated uses associated with the phosphorus criteria for reservoirs and lakes are recreational uses and aquatic life uses. It is important to note that the current pollutant loads result in concentrations that exceed the recommended SSC and that phosphorus load reductions, as outlined in the TMDL, are needed to meet the recommended SSC.