State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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August 9, 2024

Dana George, Clerk/Treasurer
Viola Wastewater Treatment Facility
106 W. Wisconsin St
PO Box 38
Viola, WI 54664

Subject: Viola WWTF - WPDES Permit WI- 0021148
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Ms. George:

The Department received a water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the Viola WWTF. The initial plan was received in May of 2023, updated versions of the plan after review comments were submitted in January 2024, May 2024, and June 2024. Based on WDNR review, the final WQT Plan (dated May 31, 2024, received June 13, 2024) is in general conformance with the WDNR Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. The final WQT plan proposes 1,450 ft of streambank stabilization along the Kickapoo River.

The proposed phosphorus reduction from this project is 321 lbs./yr. The facility has requested a habitat adjustment for the installation of bed logs along the project to receive a 2:1 trade ratio. Department water resources staff evaluated the site and agreed this area is a good candidate for bank sloping. To benefit habitat and earn a habitat adjustment large woody debris should be added, and any woody debris naturally within the project area should be kept in place or removed for sloping and then placed back in the river. It would be detrimental to the river habitat if the project led to a decreased amount of wood and less complexity of woody debris in the river and riparian corridor. In addition, standing trees within the floodplain forest are important to maintain since they are the future source of wood recruitment to the Kickapoo.

After review of this plan and a determination the project was already constructed the Department did a site inspection. The Department discovered that woody debris in the river had been removed, as well as clear cutting of all trees in the riparian corridor leading to a decrease in the amount of woody debris in and along the river. Due to this, the Department will not be approving a habitat adjustment and credits should be calculated using a 3:1 trade ratio. This would result in an approved 107 lbs./yr. of credits from the constructed project.

Credits generated from approved practices result in available credit quantities shown in Table 1. These credits will be incorporated into the reissued WPDES permit and will be used to demonstrate compliance with final phosphorus effluent limits.

Table 1: Total Phosphorus Credits Available per WQT-2024-0018

Year	Available Credits (lbs/yr) – Total
2024	107
2025	107
2026	107
2027	107
2028	107
2029	107

The Department conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. The Department has assigned the WQT plan a tracking number of WQT-2024-0018 and 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 specific WQT language, including but not limited to: a requirement for an annual trading report and effluent monitoring for total phosphorus.

If you have any questions or comments, please contact me at 715-492-4323 or at jenna.monahan@wisconsin.gov.

Thank You,

Jenna Monahan

Jenna Monahan, P.E.
Wastewater Engineer – West Central Region
Wisconsin Department of Natural Resources

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