

Dear Mr. Baumann,

On behalf of the Wisconsin Rural Water Association and its 663 member systems, I would like to provide written comments for the record concerning the proposed changes to NR102 and NR217 relating to the establishment of phosphorus limits in Wisconsin's surface waters.

Let me start by saying that our association and its membership take our job of protecting the environment and providing safe & affordable water resources very seriously. Our wastewater field staff conduct over 800 on-site technical assistance visits each year, around 100 of which are specifically on phosphorus reduction. We also realize the challenges both the Wisconsin Department of Natural Resources and the US Environmental Protection Agency face in weighing the costs and benefits of regulations needed to protect both the environment and the human resources that use them.

However, we also feel that the actions and levels as proposed in the revisions to N102 & NR217 will require a great deal of unnecessary cost to many communities while at the same time providing very little appreciable reduction in the nutrient levels in receiving waters and streams.

We believe that the state of Wisconsin should adopt phosphorus standards on a watershed by watershed basis, addressing both point and non-point sources in the most cost effective manner possible. This can only be achieved by identifying and addressing the larger sources of phosphorus first and allowing variances and flexible timeframes for smaller and more expensive phosphorus reduction measures that may or may not be needed in the future.

We also feel the state should adopt reduction measures which allow all sources of phosphorus to work cooperatively through the development of a trading program whereby municipalities can utilize less expensive and more effective off-site actions instead of spending billions of dollars in treatment improvements which provide very little reduction in total phosphorus levels.

State and federal governments must also be partners in any phosphorus reduction efforts by providing funding mechanisms that are available for any actions needed to reduce phosphorus levels in each watershed. Additional unfunded mandates in the current economic climate would be devastating to most smaller communities, especially when the overall benefit to the environment would be minimal.

Finally, municipal wastewater treatment systems are committed to working with everyone else involved in protecting our water resources, fisheries and aquatic life. Through our previous efforts, we have already reduced phosphorous levels in our discharges by 80-90%. The State of Wisconsin must now require the same commitment and cooperation from others so that real environmental improvement can be realized in the most cost effective manner possible.

Sincerely,
WRWA