



Petenwell and Castle Rock Stewards

1735 Archer Lane, Nekoosa, WI. 54457 www.PACRS.org

April 20, 2018

Wisconsin Department of Natural Resources
Attn: Kevin Kirsch
P.O. Box 7921
Madison, WI. 53707-7921

Dear Kevin,

On behalf of the board of directors and members of Petenwell and Castle Rock Stewards (PACRS), I would like to thank you and the DNR staff for all your efforts put forth into the Wisconsin River TMDL project. As you know, since 2008, PACRS has been involved with the TMDL process since our "Pontoons and Politics" lake tour. We have waited a long time for this day to arrive. We understand the magnitude of this project and all counties that it encompasses. Please know that our group will be very supportive throughout this implementation. If you believe our group can be influential to any party during this process, please reach out to us.

Permit holders that discharge to the Wisconsin River Basin have made improvements in reducing the pollution they send to the river. The majority of the phosphorous pollution enters our river via non point sources. PACRS has been working with the Farmers of Mill Creek Watershed Council for over two years. Your section 7.3.9 states Mill Creek is the fourth highest TP loading tributary watershed upstream of Petenwell Reservoir. We feel it is important to understand the issues that farmer's face and have attended several farm field tours. Mill Creek and other area farmers were invited to a meeting on Lake Petenwell in August 2016. The farmers were able to witness algae blooms on the lake and openly discuss their concerns. One of the complaints noted at the time was that DATCP has old regulations and technical standards. The Nutrient Management Plan (NMP) was developed 15 years ago. The NMP should be more site specific for soil types. The farmers claimed the current plan has uniform phosphorous application times the same throughout the state. Perhaps section 7.3.8 of the TMDL Implementation Plan will provide the county with more local control based on soil type.

The implementation of the TMDL will require WDNR, DATCP and the county Land Conservation Department to work with landowners to implement agriculture, and non-agriculture performance standards and manure management prohibitions to address sediment and nutrient loadings in the TMDL area. We have believed from the very beginning it will take trust and partnerships to make a positive change in water quality. We have worked closed with our area County Conservationists. It is a concern that our counties land and water departments may be inadequately staffed to take on added responsibilities that implementing the TMDL will require. Their departments have had to cut staff in recent years. Implementation of the TMDL will require more of their time and resources. DNR, DATCP and county staffs should be allocated to support the implementation team. The DNR 2019-21 biennial department budget should reflect financial and staff commitment to implementing the Wisconsin River TMDL.

Thank you for the opportunity to submit our comments. Our group is willing to provide support where we can make a difference. We have a vision that if all stakeholders work together we can achieve our goal of soil and water health and leave a better environment for the next generation.

Sincerely,

Rick Georgeson
President
Petenwell and Castle Rock Stewards