

## Water Quality Trading Meeting With WDNR

January 7, 2025, Virtual Through Teams

### Dave Arnott Meeting Notes

#### Attendees:

Jordan Main, WDNR, Wastewater Compliance and City Contact

Betseyjo Howe, WDNR, Permit Drafter

Matt Claucherty, WDNR Trading and Adaptive Mgt. Specialist

Dave Arnott, R/M

- Peter Gallun was sick today and could not attend.

1. An updated Water Quality Trading (WQT) Plan is required. The Plan will be very similar to the original plan. It should be a new standalone plan. Need to add paragraph about the new for the program and the amount of credits used from the program based on past WWTF effluent quality (this will be all summarized in past Annual Reports). The tense of the program should be updated (e.g. practices *will be* installed to practices *are* currently installed). There was some inconsistency of naming of practices and projects in the 2023 Annual Report. That should be addressed.

2. Updated soil samples are needed for areas in the Water Quality Trading Plan that are still in production where nutrients are being applied. The new soil samples are used to rerun the SNAP PLUS modeling. We need soil samples from Stibb and Rhodes. For Stibb, we need them for the cover crop areas, not the buffer areas. Stibb is required per NR 151 and the Nutrient Mgt. Plan (NMP) to have soil samples every 4 years so he should have those already. For WI Academy, we need updated soil samples for the fields that are protected by the buffers. For Cowlis, we need updated soil samples for the fields that are protected by the buffers. Matt C. was not sure about if WI Academy and Cowlis have an active NMP. They may or may not have recent samples. Soil samples are not required for fields that are in conservation cover.

3. SNAP PLUS has to be rerun with the soil sample phosphorus information. For fields in conservation cover or are not actively farmed, updated SNAP PLUS sampling is not required. The WDNR has the SNAP PLUS files if we need them. Note R/M uses a subconsultant for SNAP PLUS modeling.

4. The updated soil samples and modeling was not in the WPDES permit. The WDNR shared a Word document with these requirements from guidance.

5. The Delivery Factor must be accounted for in the trade ratio for the updated WQT Plan. The original plan had a factor of 1. This is due based on updated WQT guidance from WDNR. The Delivery Factor must be calculated based on the SPARROW methodology. Betseyjo can help with this calculation.

6. The interim credits will not be going away after 5 years. They are now extended for 10 years. Matt said that we should check the date each practice was installed and add on 10 years to memorialize this milestone.

7. Jordan said that the WDNR is open to a time extension beyond 1/31/2025 for the updated WQT Plan. R/M to give this some thought and then propose a time. The WDNR wants the revised to include all needed elements and would not want this to go back and forth a lot with resubmittals.