

## Pete Hartz

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**From:** Kathleen Hassing <krhassing@ati-ae.com>  
**Sent:** Tuesday, February 18, 2025 12:27 PM  
**To:** Pete Hartz  
**Cc:** Leo Kucek  
**Subject:** Watertown Facility Planning Review  
**Attachments:** Facility Planning Review Correspondence.pdf; 20250217 DOA Population Projections with DNR - Meeting Minutes.pdf

Hello Pete:

Leo, Louie, and I had a meeting with Brett Schmidt and Ashley Brechlin yesterday (2/17) to discuss the review of the City's WWTP facility plan, specifically the issue of the population projections used to develop the plan. For background, I have attached Brett Schmitt's email correspondence from 2/11/25, and any relevant related email correspondence, along with some ATI notes from the meeting with the DNR. The meeting notes include a project timeline.

The major issue is the interpretation of what counts as "current" population projections from the WI Dept of the Administration (DOA); WI Administrative Code NR 110.09(2)(j)1 covers the requirements for population projections used in wastewater facility planning.

The submitted Facility Plan used DOA population projections available at the time of plan development, along with estimates from the City's Comprehensive Plan. These population estimates are part of the plan foundation, as they were then used to develop the estimated residential flows and loadings, which are then used to develop design flows and loadings, which are used to develop mass balances, and the incorporated into each unit process evaluation. The DOA population estimates were current through the date of the Facility Plan submittal to the DNR on 12/24/24.

However, the DNR's interpretation of "current" is any DOA population projections released at any time throughout the review period of the Facility Plan, so the estimates released on 1/2/2025 shall be used for facility planning.

I attempted to address this issue in the email dated 2/13/25 by pointing out that the revised population estimates won't have a material impact because the facility plan's recommended improvements consist of replacing aging equipment, and did not include any structure or process changes, but this has not changed the DNR's position.

The scope of work that Brett Schmidt is proposing is potentially very significant; as noted above, population estimates are foundational and changing them will change the other plan components (flows and loadings, mass balances, unit process evaluations). Quite frankly, our impression after the meeting was that the DNR is looking for a complete revision of the Facility Plan to account for the recently released population estimates. This would be a significant amount of effort on ATI's part, and would be considered a scope change to our contract with the City, requiring additional budget. In addition, delaying of the Facility Plan approval may impact the replacement of the UV disinfection system, which we have fast tracked to address the equipment condition and parts availability.

Please share this information with other City staff, including the mayor and city attorney. We are available to meet with the City to discuss the situation and how you would like to proceed.

Thanks,  
Katie Hassing

### **Kathleen Hassing, PE, ENV SP**

Water/Wastewater Department Manager

Phone: (262) 784-7690 | Direct: (262) 262-7348 | krhassing@ati-ae.com  
13400 Bishop's Lane, Suite 270, Brookfield, WI 53005

**From:** [Schmidt, Brett M - DNR](#)  
**To:** [Leo Kucek](#)  
**Cc:** [Kathleen Hassing](#); [Louis B. Chapin](#); [Lorenzen, Emma K - DNR](#); [Brechlin, Ashley J - DNR](#)  
**Subject:** RE: DOA Projections / Facility Planning  
**Date:** Friday, February 14, 2025 3:07:12 PM  
**Attachments:** [image009.png](#)  
[image010.png](#)  
[image011.png](#)  
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[image013.png](#)  
[image014.png](#)

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Leo,

I just sent you an invite for a 10am Teams meeting on Monday.

[S. 110.09\(2\)\(j\)1., Wis. Adm. Code](#), requires that population projections for wastewater facilities planning be in conformance with the DOA population projections. These population projections were produced in 2024, based on 2020 census data, and released publicly on 1/2/25. (DNR Environmental Loans addressed the code requirement that wastewater facilities plans conform to the DOA updated population projections in their newsletter last month; see first screenshot below.) The only allowable exception to the use of the DOA population projections is “[i]f such projections are not available,” which does not apply here since the updated population projections include the City of Watertown. There is no exception to grandfather proposed wastewater facilities plans which were submitted to the DNR prior to DOA’s public release of updated population projections. We recognize that having to revise the proposed facilities plan so that the population projections contained therein conform with the DOA population projections may seem unreasonable. That said, such conformance is required by code whenever such projections are available, so the Department cannot approve proposed facilities plans which are not so in conformance. We anticipate that the necessary changes to the proposed facilities plan will be relatively manageable, but may require candid discussions with city leadership/staff about the projected future city population over the next 25-years.

Chapter 5 of the proposed facilities plan states that the City’s population was 24,357 in 2022. This appears to be inaccurate. The Census / DOA published population estimates for the City were 22,926 for 2020, and 22,862 for 2024; see second screenshot below. Figure 5-1 of the proposed facilities plan shows population estimates/projections from 2010-2050. In the third screenshot below, the DOA population estimates/projections are overlain on this figure. This underscores how the city needs its 20-year wastewater facilities planning to come to terms with the DOA-projected decrease in residential population (and likely flows/loads) in the decades ahead. If the WWTF is massively overcapacity as the City’s population declines, operational and compliance challenges may ensue. We recognize that there may be an argument to be made for a limited increase in the design loading for BOD/TSS/TSS based on the 2020-2022 data presented. However, facilities plans should be based on looking 20-year ahead, not just the past several years, and assuming that linear growth will continue unabated while DOA population projections (based on detailed statewide demographic analysis) show otherwise may not be reasonable. Our recommendation is that you reexamine the calculation of flows/loads over the 20-year planning period, and revise the proposed facilities plan as necessary. We do not foresee mandating a derating the WWTF’s current design capacities, but that is something that should at least be considered as part of facilities planning when populations are projected to decline substantially as is the case here.

One additional consideration is that with decreased population there will likely be fewer sewer users covering the WWTF’s costs. Recommend relooking at the user rate analysis given that there is projected to be substantially fewer residential sewer users over the planning period.

We look forward to the discussion on Monday. Hope you have a nice weekend!



Kind regards,  
Brett

**New Population Projections Published By DOA**

The Department of Administration's (DOA) Demographic Services Center has recently published updated population projections based on the 2020 Census. Going forward, proposed facilities plans must be in conformance with these updated population projections, pursuant to s. NR 110.09(2)(j)1., Wis. Adm. Code.

For questions on the facilities plan requirement, please contact DNR wastewater systems plan review staff.

Source: [https://link.edgepilot.com/s/a84e7c42/e\\_rz8lqMv0WZnzPz8kpf5w?u=https://content.govdelivery.com/accounts/WIDNR/bulletins/3cf4418](https://link.edgepilot.com/s/a84e7c42/e_rz8lqMv0WZnzPz8kpf5w?u=https://content.govdelivery.com/accounts/WIDNR/bulletins/3cf4418)

**Official Final Estimates, 1/1/2024, Wisconsin Minor Civil Divisions, with Comparison to Census 2020**

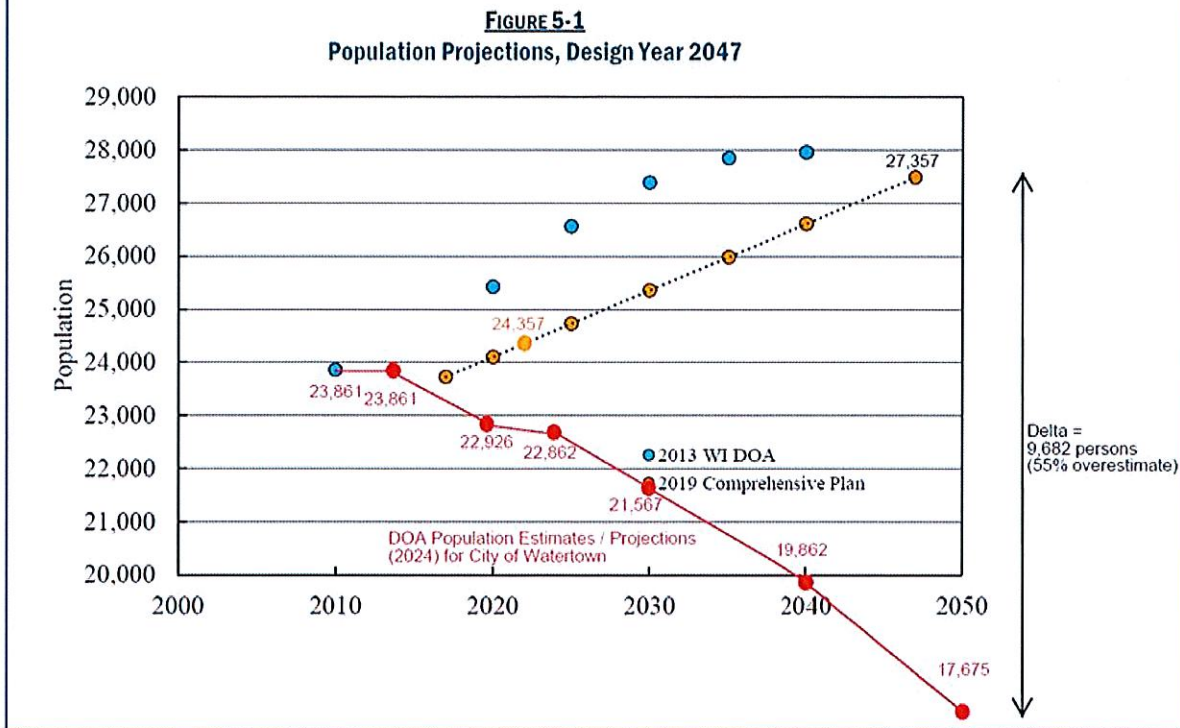
(An \* in the Split column indicates that the municipality also has territory in one or more other counties)

Source: Wisconsin Demographic Services Center

DOA Code	Place Name	Split	County Name	Final Estimate 2024	Census 2020	Numeric Change	Percent Change
14291	C Watertown	*	Dodge	8,246	8,252	- 6	- 0.07%
28291	C Watertown	*	Jefferson	14,616	14,674	- 58	- 0.40%
<b>C Watertown (TOTAL)</b>			<b>Both</b>	<b>22,862</b>	<b>22,926</b>	<b>- 64</b>	<b>-0.28%</b>

Source: [https://link.edgepilot.com/s/84054538/KNJhjh8tXke5m0yMGsxVNA?u=https://doa.wi.gov/DIR/Final\\_Ests\\_MCD\\_2024.xlsx](https://link.edgepilot.com/s/84054538/KNJhjh8tXke5m0yMGsxVNA?u=https://doa.wi.gov/DIR/Final_Ests_MCD_2024.xlsx) (available at [https://link.edgepilot.com/s/5a8fcc55/wOK78GWJi0mKIBacpVW5HQ?u=https://doa.wi.gov/Pages/LocalGovtsGrants/Population\\_Estimates.aspx](https://link.edgepilot.com/s/5a8fcc55/wOK78GWJi0mKIBacpVW5HQ?u=https://doa.wi.gov/Pages/LocalGovtsGrants/Population_Estimates.aspx))

developing future flows and loadings for the WWTP. The City's population is expected to grow 13% from 24,357 in 2022 to 27,492 by 2047, an increase of 3,135 people.



Brett M. Schmidt, P.E.

Pronouns: he/him/his

Phone: 608-622-3477

[brett.schmidt@wisconsin.gov](mailto:brett.schmidt@wisconsin.gov)

Our core values include professionalism, integrity, and customer service.

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**From:** Leo Kucek <lakucek@ati-ae.com>

**Sent:** Friday, February 14, 2025 12:52 PM

**To:** Schmidt, Brett M - DNR <brett.schmidt@wisconsin.gov>

**Cc:** Kathleen Hassing <krhassing@ati-ae.com>; Louis B. Chapin <lchapin@ati-ae.com>

**Subject:** DOA Projections / Facility Planning

**CAUTION: This email originated from outside the organization.**

**Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Hi Brett,

I left you a voicemail, but figured that I would send you an email as well. Would you have time on Monday before 11 AM to discuss the DOA projections and their impact on Facility Planning?

Thank you,

**Leo A. Kucek, P.E.**

Phone: (262) 784-7690 | Direct: (262) 785-7391  
13400 Bishop's Lane, Suite 270, Brookfield, WI 53005

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