



Wisconsin's Green Fire Comments on Wisconsin Department of Natural Resources Bureau of Water Quality Draft Program Guidance on 2018-2020 TRIENNIAL STANDARDS REVIEW (TSR) PRIORITIES FOR THE WATER QUALITY STANDARDS PROGRAM

Available at <https://dnr.wi.gov/topic/surfacewater/tsr.html>

September 13, 2018

**About Wisconsin's Green Fire:** Wisconsin's Green Fire- Voices for Conservation (WGF) supports the conservation legacy of Wisconsin by promoting science-based management of its natural resources. Our members represent extensive experience in natural resource management, environmental law and policy, scientific research, and education. Our members have backgrounds in government, non-governmental organizations, universities and colleges and the private sector

**Comment:** Wisconsin's Triennial Review process identifies its 3 year plan for keeping its water quality standards consistent with current science. This document identified 5 priorities for future work including:

1. Cyanobacterial Toxin and Cell Density Water Quality Criteria and/or Guidance for Recreational Exposure
2. Mercury Variance Streamlining or Multi-Discharger Variance (MDV)
3. Human Health Criteria Revision/Development
4. Outstanding/Exceptional Resource Waters Process Revision
5. Perfluorooctane Sulfonate (PFOS)/Perfluorooctanoic Acid (PFOA) Criteria Development

Wisconsin deserves water quality standards that are based on current science. Work on the identified priorities is appropriate. However, the plan identifies the following pollutants that will not be priorities for evaluation and update despite the existence of significant new scientific information: ammonia, arsenic, chloride, copper, cadmium, selenium, acrolein, carbaryl, diazinon, nonylphenol, and tributyltin. Underfunding of this important application of science means Wisconsin will apply regulations that are scientifically outdated and therefore either too lax or more stringent than necessary. The priority list also proposes that, despite science that shows the need and EPA mandates, Wisconsin will continue without standards for surface water nitrogen or suspended solids/turbidity impacts that exist in other states. These priorities demonstrate that, due to inadequate science staffing, Wisconsin will continue using outdated data to regulate surface waters and operate without standards present in other states. Adequate funding should be invested to accomplish these important objectives.

Thank you for the opportunity to comment on this Draft Document. Please do not hesitate to contact us to discuss further.

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