



May 20, 2020

Mark Van Weelden – Project Engineer  
Ruekert & Mielke, Inc.  
W233N2080 Ridgeview Pkwy  
Waukesha, WI 53188

Subject: Village of Mukwonago (WPDES Permit No. WI-0020265)  
Adaptive Management Plan – Conditional Approval

Dear Mr. Van Weelden:

The Wisconsin Department of Natural Resources (WDNR) has received the final draft of the Adaptive Management (AM) Plan prepared by Ruekert Mielke on behalf of the Village of Mukwonago. The most recent plan was submitted today and considered comments provided on the initial draft from 2019 and the last draft from April 2020. The Department has reviewed the AM plan and has no additional comments at this time.

Based on the WDNR's review, the AM Plan is in general conformance with the WDNR Adaptive Management Guidance and requirements contained in s. NR 217.18, Wis. Adm. Code. The plan indicates that the Village will utilize AM to comply with the effluent limitations for total phosphorus for their discharge from the Village of Mukwonago Wastewater Treatment Plant, Outfall 001, to the Fox River. Actions outlined in the AM plan involve nonpoint phosphorus reductions throughout the four local HUC 12 Watersheds that fall within and upstream of the Village. For continued AM eligibility, phosphorus reductions undertaken by the City and various AM partners are expected to offset the WWTP's proportional phosphorus loading to the Fox River, 41 lbs/yr, within the first permit term. Please note this required value is 1 lb/year more than what is stated in the plan, as  $4,115 \times 0.01 = 41$  lbs/year

The WDNR conditionally approves the AM Plan as a basis for phosphorus compliance during the next WPDES permit term. The WDNR has assigned the AM plan a tracking number of WQT-2020-0009 and will be referenced as such in the draft WPDES permit. The draft permit will contain an interim limit for phosphorus and reporting requirements consistent with s. NR 217.18, Wis. Adm. Code. The final AM plan will be included as part of the public notice package for permit reissuance, and final approval is subject to public comment and EPA review.

The WDNR appreciates your interest in watershed-based phosphorus compliance. If you have any questions or comments, please contact me at [office (414) 263-8623] [mobile (414) 399-3039] or [nicholas.lent@wisconsin.gov](mailto:nicholas.lent@wisconsin.gov).

Thank you,

Nick Lent

Wastewater Engineer  
Wisconsin Department of Natural Resources

e-CC: Dave Brown and Wayne Castle – Mukwonago Utilities  
Lisa Creegan – WDNR  
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