



November 7, 2018

Cathy Austin
Director of Public Works, City of Plymouth
PO Box 277
Plymouth, WI 53073

Subject: City of Plymouth Utilities (WPDES WI-0030031) Adaptive Management Plan

Dear Ms. Austin:

The Department received the final draft of the Adaptive Management (AM) Plan prepared by McMahon Associates on behalf of The City of Plymouth Utilities. The final plan, dated November 6th, 2018 was received via electronic submittal on November 6th, 2018. The Department has reviewed the AM plan and has no additional comments at this time.

Based on the WDNR 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 City of Plymouth will utilize AM to comply with the effluent limitations for total phosphorus for their discharge from the Plymouth Utilities Wastewater Treatment Facility, outfall 001, to the Mullett River. Actions outlined in the AM plan involve nonpoint phosphorus reductions throughout the Mullett River Watershed, identified as the AM plan's action area. For continued AM eligibility, phosphorus reductions undertaken by Plymouth Utilities and various AM partners are expected to offset the WWTF's proportional phosphorus loading to the Mullett River, 979 lbs/yr, within the first permit term.

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-2018-0009 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 department appreciates your interest in watershed-based phosphorus compliance. If you have any questions or comments, please contact me at 608-264-9244 or email matthew.claucherty@wisconsin.gov.

Thank you,

A handwritten signature in black ink, appearing to read 'Matt Claucherty'.

Matt Claucherty
Water Resources Management Specialist
Wisconsin Department of Natural Resources

e-CC:

Michael Penkwitz – Plymouth Utilities
Curtis Nickels – WDNR
Amanda Perdsock – WDNR
Nick Vande Hey – McMahon Associates, Inc.