



**WISCONSIN DEPARTMENT OF
ADMINISTRATION**

SCOTT WALKER
GOVERNOR

SCOTT A. NEITZEL
SECRETARY

Office of the Secretary
Post Office Box 7864
Madison, WI 53707-7864
Voice (608) 266-1741
Fax (608) 267-3842

October 7, 2015

Cathy Stepp, Secretary
WI Department of Natural Resources
101 S. Webster St.
Madison, WI 53703

Dear Secretary Stepp:

Attached is the final report from the Wisconsin Department of Administration Pursuant to WI ACT 378 - directing the Wisconsin Department of Administration to make an

(2) INITIAL DETERMINATION CONCERNING THE WATER QUALITY STANDARD FOR PHOSPHORUS. (a) The department of administration, in consultation with the department of natural resources, shall determine whether attaining the water quality standard for phosphorus, adopted under s. 281.15, through compliance with water quality based effluent limitations by point sources that cannot achieve compliance without major facility upgrades is not feasible because it would cause substantial and widespread adverse social and economic impacts on a statewide basis. The department of administration may make separate determinations under this paragraph for statewide categories of point sources.

The Wisconsin Department of Administration finds that implementation of the Wisconsin water quality standards for phosphorus will cause substantial and widespread adverse social and economic impacts to the state. Therefore it directs the Department of Natural Resources to move forward with the formal process of requesting approval of a multi-discharger variance (MDV) from the United States Environmental Protection Agency for the purposes of phosphorus reduction. In addition, DOA requests the DNR to hold a 45 day public comment period before its formal submittal to the EPA for the purposes of discussing how it will implement a MDV if ultimately approved by the EPA.

The Department of Administration concludes its role in this part of the process. Moving forward should an MDV be granted by the EPA the department looks forward to working with the DNR in meeting the statutory directives in WI ACT 378.

Sincerely,

Scott A. Neitzel

Secretary