

November ____, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

Ms. Hyde and Ms. Wester:

On October 20, 2015, 16 Wisconsin residents petitioned the EPA to require corrective action regarding Wisconsin's Clean Water Act deficiencies. The DNR's first public response to the Petition was a press release wherein the Department indicated that all 75 technical shortcomings in the Wisconsin Pollutant Discharge Elimination System Program were resolved or close to resolution. The primary focus of this letter is to implore the EPA not to allow unsupported assertions of resolution to stymie the comprehensive, prompt response to the Petition. The undersigned, retired DNR employees support the Petition and ask the EPA to consider the erosion of DNR's mission and operating procedures, in addition to the 75 technical shortcomings identified by EPA in 2011, as a real and ongoing threat to Wisconsin's compliance with the CWA.

Erosion of the public trust began in part in the mid-1990s with the elimination of the Natural Resources Board-appointed DNR Secretary. This elimination allowed more political influence in decisions affecting natural resources; a problem only magnified by elimination of the Public Intervener's Office that gave ordinary citizens the ability to challenge government decisions. Significant changes within the past five years exert a further synergistic effect on the 75 deficiencies listed in the EPA's 2011 letter to the DNR.

Among the most serious problems with the "new DNR" are the following:

- 1) The current DNR top management, the Governor, and the Legislature exhibit anti-science behavior including: drastic cuts in science budgets; orders to cease discussion of climate change and its effects on the environment; gag orders on DNR employees commenting on science issues (only DNR administrators may speak to the press); and exclusion of science professionals from negotiating sessions with entities seeking DNR permits or approvals. Because effective government is essential to the protection of Wisconsin's waters, CWA non-compliance will persist and worsen if the State continues to cut DNR staffing and funding.
- 2) The "Wisconsin is Open for Business" slogan clearly applies to DNR environmental permitting. Although DNR has historically balanced its decision-making using social, economic, and environmental factors, the clear bias is now in favor of keeping business happy at the expense of CWA goals and protecting natural resources for the common good.

3) Structural reorganizations have placed much greater authority for final permit conditions in the hands of political appointees rather than DNR biologists, engineers, lawyers, and other Department experts. Bypassing scientific and legal expertise conveys to permit applicants an almost limitless potential for negotiation with DNR upper management. This potential is realized as the number of permittees increase without a corresponding increase in Department staffing or funding. Increasing pressure from DNR top managers to review permit applications, nutrient management plans and related documentation also leads to technically and legally deficient permits.

4) The "value" of aquatic resources to the top management of the "new DNR" has nothing to do with balanced aquatic communities, the intrinsic value of the resource, or the moral obligation to manage Wisconsin's waters in the name of public interest. Water is now a commodity to be sold and traded in the marketplace.

5) Environmental enforcement effort and results have declined significantly in the past five years. Inadequate permit review and enforcement unacceptably shifts the financial and technical burden of industry review to citizens. One example, also set forth in the Petition, is the exponential increase in dairy CAFOs with stagnant enforcement numbers and staffing levels.

The EPA must seriously consider the recent assault on the basic principles of the CWA by the Legislature, the Governor, and DNR political appointees when examining the need to correct deficiencies in the DNR's exercise of its CWA permitting authority. If EPA does not require a prompt and robust fix of WPDES Program deficiencies, absent rescission of the DNR's permitting authority the general quality of aquatic resources in Wisconsin will decline for the first time since the passage of the CWA in 1972. Allowing this decline would have financial implications for all Wisconsinites: prior and significant public investment in water clean-up would be mooted; water pollution would pose greater and greater threat to public health.

In conclusion, the undersigned, retired DNR employees urge the EPA not to accept the assurances of DNR top managers that the Department has corrected WPDES Program deficiencies. Whether at public meetings or through alternative forums, EPA should seek the opinions of experienced DNR professional employees for a true picture of how in the last five years the DNR has compromised its mission and compliance with the CWA. Assurances of confidentiality will be essential to avoid retaliation for their candor.

Your review of the WPDES Program is the only viable option left to exert leverage on the Wisconsin governor and Legislature to restore the once-great Wisconsin DNR and to ensure compliance with the CWA.

Signed,

<u>Joseph R. Ball</u>	<u>Joseph R. BALL</u>	<u>32</u>
Signature	Name (printed)	Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 25, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
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Signed,

Allen E Bluhm

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12 years 8 months

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

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Signed,

<i>Theodore Bosch</i>	<i>Theodore Bosch</i>	<i>34</i>
Signature	Name (printed)	Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 30, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
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Signed,

Patricia M. Chabot PAT CHABOT 14

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

December 5, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
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Signed,

Roy M. Christianson

6 years of DNR service and coordinator of the waste load allocations for the Lower Fox and Upper Wisconsin Rivers

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 30, 2015

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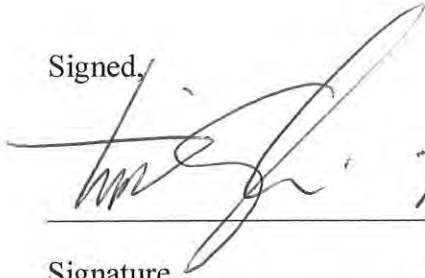
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Signed,



Tim Coughlin

29 years

Signature

Name (printed)

Number of years of DNR service

Environmental Enforcement Specialist (Retired)

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 14, 2015

United States Environmental Protection Agency
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Signed,

<i>Terrance M. Cummings</i>	<i>TERRY CUMMINGS</i>	<i>31</i>
Signature	Name (printed)	Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 22, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

Ms. Hyde and Ms. Wester:

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Signed,

Andrew H. Fayram

Andrew H. Fayram

15

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

Although I am not currently retired I left state service at the WDNR for a number of reasons including morale at the WDNR and employment opportunities for my family in another state.

December 3, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Signed,



Stacey M. Fix

22 Yrs
3.5 Yrs
4.5 Yrs

DNR
DATCP
Public Service Commission

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 12, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Signed,



David L. Gjestson

30

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 14, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Signed,



Signature

Judith Gottlieb

Name (printed)

30

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 14, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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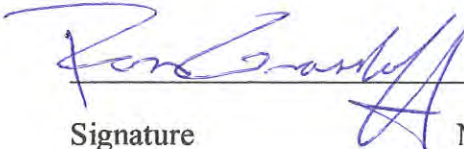
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Signed,

	RON GRASSHOFF	20 YEARS
Signature	Name (printed)	Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November _17____, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Signed,

_____/s/_____
Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

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United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
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77 West Jackson Blvd.
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ATTN: WN-16J

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Signed,

 Paul Scott Hausman 32 years

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November ____, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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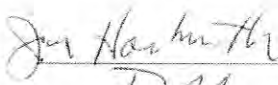
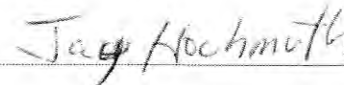

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Signed,

		
Signature	Name (printed)	Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

Dave, I'd love to sign the letter. There's a slight logistics problem. I'm in Florida for several months and do not have a printer. Please consider this email as the authorization you need from me to sign this letter for me and mail it to Tressie K.

Thanks, Jay

November ____, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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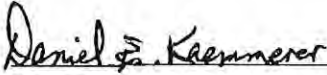
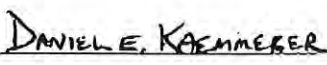

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Signature	Name (printed)	Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

v

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November 28, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Patrick Kaiser

PATRICK KAISER

30

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 25, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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 Dale E. Katsma 38

Signature

Name (printed)

Number of years of DNR service

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A handwritten signature in black ink, appearing to read "Joanne Kline". The signature is written over a horizontal line that spans the width of the table below.

Joanne Kline

23 (1991 to 2014)

Signature

Name (printed)

Number of years of DNR service

November 17, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Signed,

	Dale J Lang	30
Signature	Name (printed)	Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November ____, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

Ms. Hyde and Ms. Wester:

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- 2) The "Wisconsin is Open for Business" slogan clearly applies to DNR environmental permitting. Although DNR has historically balanced its decision-making using social, economic, and environmental factors, the clear bias is now in favor of keeping business happy at the expense of CWA goals and protecting natural resources for the common good.

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Signed,

Tim Larson

Signature

Tim LARSON

Name (printed)

31⁺ years (Fisheries)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 26, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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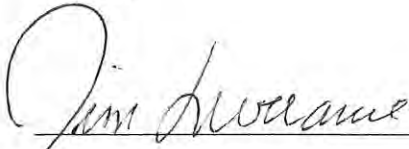
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Signed,



JIM LEVERANCE

28 year w/DNR & Public Service
Commission

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 12, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

Ms. Hyde and Ms. Wester:

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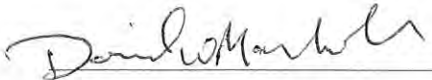
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Signed,

 David W Marshall 30

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 19, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

Ms. Hyde and Ms. Wester:

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Mark Martin

MARK MARTIN

40

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 25, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Signed,

<u>Ronald H. Martin</u>	<u>Ronald H. Martin</u>	<u>32 years</u>
Signature	Name (printed)	Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 20, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Signed,

Bob Martini BOB MARTINI 32

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
 Cathy Stepp and Patrick Stevens, DNR

December 3, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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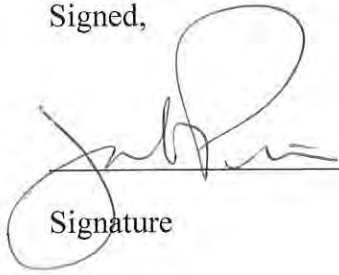
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Your review of the WPDES Program is the only viable option left to exert leverage on the Wisconsin governor and Legislature to ensure compliance with the CWA.

Signed,

A handwritten signature in black ink, appearing to read "Janet Price", written over a horizontal line. The signature is stylized with a large loop at the beginning.

Signature

Janet Price

Name (printed)

10

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November ____, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Signed,

Tim Rasman

Tim Rasman Green Bay, WI 28 years

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 29, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Signed,

Paul W. Rasmussen Paul W. Rasmussen 28

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
 Cathy Stepp and Patrick Stevens, DNR

November 1st, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
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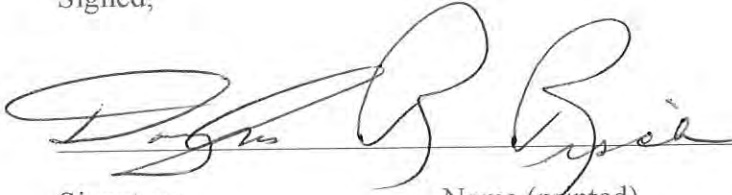
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Signature

Name (printed)

Doug Risch 27 yrs of Service

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November ~~30~~, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
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James Schmidt

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Signature

Name (printed)
schmidt

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 13, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
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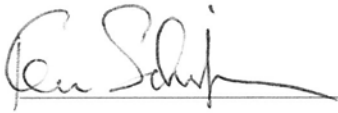
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Ken Schreiber

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Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

MARK F SESING
W3910 ECHO LANE
CAMPBELLSPORT WI
53010

November 16, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
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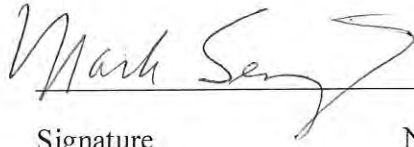
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Your review of the WPDES Program is the only viable option left to exert leverage on the Wisconsin governor and Legislature to restore the once-great Wisconsin DNR and to ensure compliance with the CWA.

Signed,



Signature

MARK SESING

Name (printed)

33

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

December 3, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

Ms. Hyde and Ms. Wester:

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Among the most serious problems with the "new DNR" are the following:

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Signed,

Donald L. Wheeler 17

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 18, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Signed,

<u>Vanessa Thompson</u>	<u>VANESSA THOMPSON</u>	<u>28</u>
Signature	Name (printed)	Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

December 7, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Signed,

(by /s/ Dan Marshall) Tom Thorsen 30
Signature Name (printed) Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 30, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Signed,

 Richard Vogt 23 yrs

Signature Name (printed) Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 12, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Signed,

Kenneth S. Wade Kenneth S. Wade, P.E., P.G. 13 years
with DNR

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November _13____, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Signed,

____/s/____ Robert Wallen, Information & Education, MacKenzie Center, Poynette, 1970-2001

Signature	Name (printed)	Number of years of DNR service
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cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 20, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

Ms. Hyde and Ms. Wester:

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Signed,



M. Scott Watson

25

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 20, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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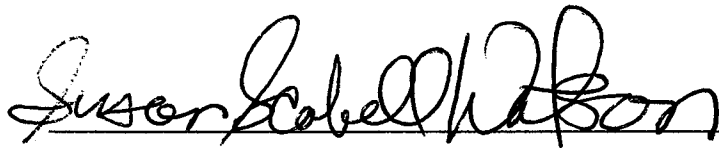
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Signed,

Susan Scobell Watson



21

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 16, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

Ms. Hyde and Ms. Wester:

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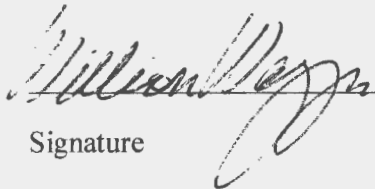
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Signed,

	WILLIAM NAWRZYŃSKI	38
Signature	Name (printed)	Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 12, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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Signed,

 Wendy K. Weisner 29

Signature

Name (printed)

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

November 15, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590

ATTN: WN-16J

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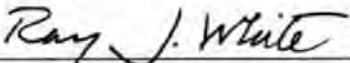
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Signed,

	Ray J. White	1957 to 1972*
Signature	Name (printed)	Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR

* With interruptions for study and experience at other institutions.

November 30, 2015

United States Environmental Protection Agency
Tinka Hyde, Director, Water Division
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
ATTN: WN-16J

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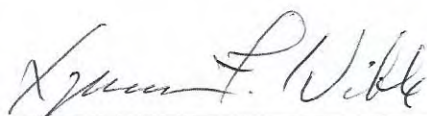
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Signed,

Lyman F. Wible
5614 Sedgemoor Road,
Middleton, WI 53562



Lyman F. Wible

15

Signature

Name

Number of years of DNR service

cc: Barbara Wester and John Colletti, EPA Region V
Cathy Stepp and Patrick Stevens, DNR