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VIA EMAIL ONLY

Ms. Laurie Ross
Natural Resources Board Liaison
laurie.ross@wisconsin.gov
(608) 267-7420

RE: Comments on Scope Statement for Board Order WY-18-16

Dear Ms. Ross:

Thank you for the opportunity to submit comments on the scope statement for revisions to chapters NR 102, 106, 205, and 217 relating to Wisconsin's antidegradation policy and implementation procedures (Board Order WY-18-16). We are writing on behalf of the Municipal Environmental Group – Wastewater Division (MEG), which is an association of over 100 municipalities throughout the state of Wisconsin who own and operate wastewater treatment facilities.

The revisions to Wisconsin's antidegradation policy outlined in the scope statement for Board Order WY-18-16 have the potential to significantly impact MEG members. We therefore request that DNR convene an advisory committee to provide input on all aspects of the proposed revisions, including potential rule language and the selection of an approach for implementing antidegradation policies. We also request that MEG be included in any advisory committee process.

Very truly yours,



Paul G. Kent
Vanessa D. Wishart

PGK/VDW:mai
cc: MEG Steering Committee

Milwaukee Office