

February 8, 2021

VIA EMAIL
DNRWWGuidance@wisconsin.gov

Wisconsin Department of Natural Resources
Attn: Amanda Minks
DNR-WT/3
P.O. Box 7921
Madison, WI 53707-7921

RE: Comments of the Municipal Environmental Group – Wastewater Division
WDNR-GP11-2021

Ms. Minks:

I am submitting these comments on behalf of the Municipal Environmental Group–Wastewater Division (MEG Wastewater). MEG Wastewater is an organization of approximately 100 municipalities statewide who own and operate wastewater treatment plants. MEG represents facilities ranging in size from small sanitary districts to larger utilities. MEG appreciates the opportunity to comment on the reissuance of GP-11 relating to wetland impacts from municipal development.

MEG supports the comments submitted on GP-11 by the League of Wisconsin Municipalities. Of particular importance to MEG is the fact that GP-11 as currently proposed fails to include the streamlined permitting process that is available to electric, gas, and PSC-regulated water utility projects, but not sewer or stormwater utility projects, in the Utility General Permit, GP-3. The streamlined permitting process for utility projects outlined in GP-3 is vital to the efficient undertaking of *all* utility projects. Making the more flexible and streamlined provisions of GP-3 available to electric, gas, and PSC-regulated water utilities but not to sewer or stormwater utility projects is nonsensical and unreasonably burdens sewer and stormwater utility projects.

MEG requests that the streamlined non-reporting coverage elements of GP-3 be made available to sewer and stormwater utility projects in GP-11. The inclusion of these provisions in GP-11 would allow the department to narrowly tailor these provisions to sewer and stormwater utilities in parallel with the non-reporting requirements for other utilities in GP-3. MEG is aware that the League has advocated for this position for many years, and agrees that it is long past the time to provide the same options to sewer and stormwater utilities that are provided to other utilities under GP-3.

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Thank you for consideration of these comments.

Sincerely,

STAFFORD ROSENBAUM LLP

A handwritten signature in black ink, appearing to read "Vanessa D. Wishart". The signature is written in a cursive, flowing style.

Vanessa D. Wishart

Paul G. Kent

VDW:mai