

August 29, 2022

VIA EMAIL  
[Casey.Sweeney@wisconsin.gov](mailto:Casey.Sweeney@wisconsin.gov)

Wisconsin Natural Resources Board  
c/o Casey Sweeney  
P.O. Box 7921  
Madison, WI 53707-7921

**RE: Comments of the Municipal Environmental Group – Wastewater Division on Clean Water Fund Program Intended Use Plan for State Fiscal Year 2023**

Dear Mr. Sweeney:

I am submitting these comments on behalf of the Municipal Environmental Group–Wastewater Division (MEG Wastewater). MEG Wastewater is an organization of over 100 municipalities statewide who own and operate wastewater treatment plants. We represent facilities ranging in size from small sanitary districts to larger utilities.

Many of MEG’s members rely on the Clean Water Fund Program for wastewater projects. We appreciate the work the department does on the CWF Program in general and on this Intended Use Plan (IUP). However, we have some concerns about the revisions to the affordability criteria and methodology for the qualification to receive principal forgiveness.

The IUP revises the criteria a municipality must meet to be eligible for levels of principal forgiveness. We understand that with these revisions, the department is attempting to allocate principal forgiveness funds to the highest priority projects in municipalities with the greatest financial need. We do not object to that prioritization as a general matter. However, a number of our MEG members have planned projects under the SFY 2022 criteria for principal forgiveness. Changing the criteria for them at this point in the process would significantly decrease the anticipated amount of principal forgiveness for a number of our members. This would have a major financial impact on these municipalities, particularly because many have already undertaken major steps for planned projects.

To avoid pulling the rug out from under some municipalities, we request that the department allow municipalities who have already planned projects in reliance on a certain amount of principal forgiveness based on the SFY 2022 criteria to receive that level of principal forgiveness for those projects. This will ensure that those municipalities can move forward with planned projects based on

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the level of principal forgiveness on which they had reasonably relied while planning and budgeting for those projects.

Thank you for consideration of these comments. We greatly appreciate the opportunity to participate in this process.

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