

Proposal to Repeal Michigan's Authority to Administer Section 404 of the Clean Water Act and Repeal Michigan Wetlands Protection Program Talking Points

- Wetlands provide untold functions and values:
 - ◆ Flood control
 - ◆ Water quality protection
 - ◆ Shoreline stabilization
 - ◆ Wildlife/fisheries habitat
 - ◆ Ground water Recharge
 - ◆ Recreational Opportunities
 - ◆ Education and Research

- Benefits of the State Wetland Protection Program:
 - ◆ MDEQ regulates 95.1% of Michigan's wetlands
 - ◆ MDEQ staff have more knowledge of local wetland resources
 - ◆ MDEQ has more field offices, providing on-site review and the ability to work locally with permit applicants to reduce adverse impacts to the resource
 - ◆ State permits are often more timely than federal permits – actions must typically be taken on completed permit applications within 90 days (150 days if there is a hearing) and the average permit processing time is approximately 60 days.
 - ◆ The state program can reduce the need for duplicative state and federal permits, and eliminate potentially conflicting permit decisions
 - ◆ The state program can encourage integration of issues such as floodplain management, storm water management, local or regional zoning or land use plans

- Michigan's Future Without a State Wetlands Protection Program:
 - ◆ Loss of wetland protection and the functions and values they provide – at a minimum, an estimated 930,856 acres of wetlands, representing approximately 17 percent of Michigan wetland resources are not clearly protected under federal law.
 - ◆ Considerable time delays and frustration for permit applicants due to backlog and jurisdictional confusion under the US Army Corp of Engineers – some permit applications are taking 600 – 700 days to review
 - ◆ Permit applicants will be required to obtain multiple permits from multiple agencies increasing time and costs
 - ◆ Hinder state's ability secure significant funding for Great Lakes restoration and implement recommendations in the *MI-Great Lakes Plan*
 - ◆ Loss of wetland assistance services to Michigan citizens including wetland mapping and aquatic invasive species control
 - ◆ Michigan will need to develop/expand a 401 certification program required by federal law that was previously incorporated into the state 404 review process – this will require additional staff and monetary resources

