
Please consider these comments and suggestions regarding proposed rule, Env-Wt 311.10:

We suggest adding clarification to Env-Wt 311.10(d) to eliminate the requirement that projects will require a Functional Assessment specifically for projects in surface waters (docks, boatlifts, etc.).

This requirement will only serve to greatly increase application costs and will not provide any more useful information for review than identification of the "Reference Line".

In cases where there are no wetlands involved, beyond surface waters, the location of the "Reference Line" (full pond level at shore) is readily identifiable and significant costs and complications will result if permit applications need to be completed by a professional capable of preparing a function and value analysis. Surface water projects should be eliminated from this requirement.

Thank you for considering these comments and suggestions.

Respectfully Submitted,



Paul W. Goodwin

pwg@watermarkmarine.com

Watermark Marine Systems, LLC