

**Department of Environmental Quality  
Land and Water Management Division  
Workload Actions**

The Department of Environmental Quality (DEQ), Land and Water Management Division (LWMD) has a significant structural imbalance between the responsibilities it is charged with and the resources available to meet those responsibilities. LWMD has evaluated the scope of its responsibilities and has identified actions to be taken to balance the workload with existing funding and resources. These **short term** actions must be taken until LWMD's structural imbalance is addressed.

**Action Items**

1. **Issue all permits, except for Part 353, Sand Dunes Protection and Management, for the full five year time frame allowed by state statute, rules and Michigan's Section 404 program.** Last year LWMD processed over 500 requests for permit extensions. By extending the permit terms to five years, this will greatly diminish the number of permit extensions requiring annual review and action. The permit time frame for Part 353 was recently extended to two years as a result of an agreement with the Critical Dunes Area Stakeholder Work Group and thus will not be changes at this time.
2. **Strictly follow the statutory and rule deadlines for processing permit applications; cease allowing applicants to withdraw applications in order to temporarily suspend processing for up to 180 days.** The statute and rules provide time frames for the review of applications and permit processing; Staff will closely follow these time frames and no longer allow applicants to prolong the process. This will benefit applicants who submit complete applications and encourage others to improve the quality of their submittals.
3. **Process most General Permit/Minor Project applications with minimal review and no site inspection.** In 2007, over 58% of the non-transportation project applications were either Minor Project (MP) or General Permit (GP) applications. MP/GP applications will be processed without conducting a site inspection as long as the application is reasonably complete, photographs of the site have been provided, and we have no reason to suspect significant problems with the project.
4. **Suspend LWMD review of designated Part 301 and Part 303 permit applications, deferring to decisions by the US Army Corps of Engineers (USACE) in areas of joint jurisdiction.** LWMD proposes to issue a General Permit (GP) under the authority of Part 301, Inland Lakes and Streams, and Part 303, Wetlands Protection that would authorize minor activities in waters where the USACE has jurisdiction under Section 10 of the Rivers and Harbors Act/Section 404 of the Clean Water Act. LWMD will defer and issue a GP if the proposed activity has been approved by the USACE.
5. **More consistently prioritize reactions to complaints of unauthorized activities.** The LWMD categorizes citizen complaints based on size and scope of environmental impact and threat to public health and safety. In 2007, staff took actions on 50% of the low priority complaints. LWMD will no longer respond to the lower priority complaints until adequate staff resources are available to address all complaint cases.
6. **Insure that staff is consistently administering the law regarding requests for pre-application meetings by requiring submittal of the appropriate fee for each meeting, including subsequent meetings.** Statutory amendments (324.30306b and 324.30104b) were passed in 2006 which require a fee for each such meeting,

**Potential Impacts**

Although difficult to quantify, the above actions may have impacts on the public and Michigan's lakes, streams, wetlands, and shorelines. The reduction in the review and oversight of permit applications and reported violations may result in loss of wetlands and public bottomland resources, illegal activities, and possible permitting delays and uncertainty for construction and development projects. These actions will also result in reduced services to applicants and the public and minimal outreach to the public and the regulated community.