

To: Members, Committee on Economic Development, Housing and Government Operations

From: Senator Robert Wirch, Chair

Date: September 1, 1999

Re: Clearinghouse Rule 99-088

Pursuant to the committee hearing held August 17, 1999, I would like to send the following letter to the Board. Russ Whitesel of the Legislative Council has worked closely with the Department on these modifications.

Please contact my office by 4:00 p.m. today, to indicate your ballot preference to approve/disapprove this letter.

Thank you for your prompt attention. If you have any questions, please contact Beth (7-8979) in my office.

State Capitol, P.O. Box 7882, Madison, Wisconsin 53707-7882 • 608-267-8979

Toll-Free Office Hotline: 1-888-769-4724

Email: Sen.Wirch@legis.state.wi.us • Fax: (608) 267-0984

Home: 3007 Springbrook Road, Kenosha, Wisconsin 53142 • (414) 694-7379

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OCT 22 1999

Tommy G. Thompson
Governor

Post-It® Fax Note	7671	Date	10-25	# of pages	2
To	Don Reed	From	Sen. Wirch		
Co./Dept.		Co.			
Phone #		Phone #	608 267 8929		
Fax #	414 547 1103	Fax #			

Marlene A. Cummings
Secretary

1400 E. WASHINGTON AVENUE
P.O. BOX 8935
MADISON, WISCONSIN 53708-8935
E-Mail: dorl@mail.state.wi.us
(608) 266-2112
FAX#: (608) 267-0644

October 22, 1999

THE HONORABLE SENATOR ROBERT WIRCH, CHAIR
COMMITTEE ON ECONOMIC DEVELOPMENT, HOUSING
AND GOVERNMENT OPERATIONS
ROOM 310 SOUTH STATE CAPITOL
MADISON WI 53702

THE HONORABLE REPRESENTATIVE EUGENE HAHN, CHAIR
COMMITTEE CONSUMER AFFAIRS
ROOM 15 WEST STATE CAPITOL
MADISON WI 53702

nothing

RE: Senate Clearinghouse Rule 99-088 Relating To the Regulation And Licensing
Of The Professions of Geology, Hydrology And Soil Science – Exempting
Certified Wetland Scientists

Dear Senator Wirch and Representative Hahn:

The Examining Board of Professional Geologists, Hydrologists and Soil Scientists (Examining Board), met on October 19, 1999, to discuss your letter of October 18, 1999, requesting that the examining board consider not requiring a certified wetland scientist to be licensed as a professional geologist, a professional hydrologist or a professional soil scientist.

As currently proposed, GHSS 1.06 recognizes wetland mapping as cited in s. 23.32(2)(c), for which no GHSS professional license is required.

The Examining Board does not have the statutory authority to define other practice areas contained in wetland science, or to adopt a certification method to exempt the practice discipline of wetland science.

It has been proposed that GHSS 1.06 be further broadened to exempt wetland scientists certified by the Society of Wetland Scientists, or alternatively to exempt the following activities: wetland and water resource permitting, wetland functional assessments, wetland mitigation/restoration design, and wetland monitoring using currently accepted state and federal guidelines.

1. The Examining Board's statutory authority cited in s. 470.03(1) is in part:

a. to promulgate rules establishing requirements and standards for the practice of GHSS.

Senator Wirch and Representative Hahn

Page 2

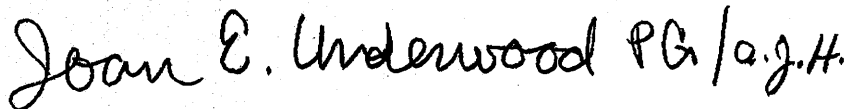
October 22, 1999

The Examining Board, nor any of its sections, may promulgate rules outside this statutory authority.

Chapter 470 provides an exemption pursuant to s. 470.025(1) for persons lawfully practicing within the scope of a license, permit, registration or certification granted by this state or the federal government. Thus DNR, the federal government, or the state could act to certify wetland scientists. However, the Examining Board has no statutory power to grant such an exemption utilizing a private organization's certification.

I hope these few lines address all your concerns and I look forward to hearing from you.

Respectfully,



Joan E. Underwood PG, Chair

Examining Board of Professional Geologists, Hydrologists and Soil Scientists

JEH:ajh

Cc: Senator Richard Grobschmidt
Representative Tom Hebl
Marlene A. Cummings, Secretary

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SENATOR ROBERT WIRCH

Page 2

September 7, 1999

In your September 1, 1999, letter you ask the Examining Board of Professional Geologists, Hydrologists and Soil Scientists to modify the rule in some specific areas. I believe that the Board has addressed most of your requests and will consider your request regarding clarifying that the defined areas of practice do not include the practice of wetland delineation engaged in wetland ecology so that such persons can provide their services without risking prosecution for practicing "geology," "hydrology" or "soil science" without a license.

I would also like to report the status of our application processing:

Profession	Denial				Intent to Deny				Approved	Pending
	D/EXP	EXP	D	TOT	D/EXP	EXP	D	OT		
Hydrology	25	4	40	69	3	3	4	10	65	179
Soil Scientists	1	1	1	3	4	12	0	16	33	197

Denials and Intent to Deny application results were categorized by the applicant not meeting the educational (ED) or experience (EXP) requirements of minimum competency standards as defined by the nonstatutory provisions of 1997 Wisconsin Act 300.

I hope these few lines address all your concerns and I look forward to hearing from you.

Joan E. Underwood, PG/a.g. Hahn

Joan E. Underwood PG, Chair

Examining Board of Professional Geologists, Hydrologists and Soil Scientists

JEU:ajh

Cc: Representative Eugene Hahn
Marlene A. Cummings, Secretary

File: I:\BDP\GHSS\SCR9988RES.DOC

Don Reed
rule SEWRPC

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address
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issue

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problem
completely

Westland

definitions

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Function
Assess

Westland
mitigation

design

Don Reed

414-547-6721

October 13, 1999

Mr. Steven V. Donohue, P.H.
Examining Board of Professional Geology, Hydrology and Soil Science
Department of Regulation and Licensing
1400 East Washington Ave.
P.O. Box 8935
Madison, WI 53708

OCT 18 1999

Subject: **Senate Clearinghouse Rule 99-088 Relating to the Regulation and Licensing of the Professions of Geology, Hydrology and Soil Science**

Dear Mr. Donahue:

This is in regard to your letter of October 7, 1999 to Senator Wirch, which details changes proposed by the Board of Professional Geologists, Hydrologists and Soil Scientists (the Board) to the above-referenced draft rules (GHSS 1-5). Your attention to the concerns of wetland scientists to date has been appreciated. Unfortunately, the proposal to exempt from the rules only those professionals practicing wetland delineation is an incomplete remedy to the problems created by Chapter 470 for wetland scientists and other professionals practicing in interdisciplinary fields. Although I have been registered as a **Professional Hydrologist as a result of my September 17th** hearing before your section of the Board, I am writing out of concern for my colleagues who may not fare so well in the process.

As you may remember, I am one of the six wetland scientists who presented testimony to the Board on September 9, 1999 regarding what constitutes our scope of practice. (Note: Although we variously described ourselves as wetland scientists, biologists, ecologists or environmental scientists, none of us used the term "wetland delineation scientist" as you have referred to us in your letter.) Three of us also presented similar testimony to Sen. Wirch's committee at a hearing on August 17, 1999. I am writing to you and have also written to Sen. Wirch because my colleagues and I have apparently failed to get our points across that:

1. wetland scientists do more than delineate wetlands; and
2. wetland scientists and the public they serve will be harmed by the rules because most are not eligible for licensing and therefore cannot legally perform any services beyond the mere identification of wetland boundaries.

As several of us stated during the hearings, wetland scientists also perform services that are encompassed within the State's definitions of Professional Hydrologist and Professional Soil Scientist whenever we evaluate wetland functions, assess impacts to wetlands or design or monitor wetland restoration projects. These services are typically performed in addition to a delineation whenever we prepare documentation required as part of a State of Wisconsin permit application process. The practice of wetland delineation is simply a means for identifying the presence and extent of a particular

6429 Maywood Avenue
Middleton, WI 53562

resource. Stopping there would be comparable to identifying the presence and extent of a water body, or the presence and extent of a hydric soil and providing no further information. What's the point of inventorying a resource without utilizing that information for some purpose? Why allow wetland scientists to inventory the resource without permitting us to use the information within the scope of our training and experience? Are mainstream hydrologists and soil scientists prepared to undergo training in ecology and botany, and to learn the intricacies of environmental regulations that apply to wetlands so that they can fill the need for services that cannot be legally performed by those who are currently trained? Is the public prepared to pay more for and get less value from wetland services performed by inexperienced non-wetland professionals?

Given the Board's reluctance to consider wetland related experience as qualifying for credit toward licensing (as evidenced by the proceedings, but not the results, of my hearing), it seems obvious that professionals performing this work are not considered practitioners of hydrology or soil science, per se, and should therefore either be exempted from the rules or provided with their own licensing program. In the absence of such a remedy that addresses the full practice of wetland science, those wetland scientists who are not able to obtain either a hydrology or soil science license would have to practice under the threat of legal consequences or be out of a job. This is unacceptable for these professionals as well as the public they serve.

I understand that you are limited in the remedies you can apply in the rules without a change in the statute. However, here are some options for solutions that I believe would more thoroughly address the problems I have described. Some of them would also address problems for other professionals such as fisheries biologists and limnologists.

1. Exempt wetland delineation AND all services associated with delineation, including but not necessarily limited to evaluation, impact assessment, mitigation design and mitigation monitoring.
2. Establish a threshold of some type (i.e. proportion of time spent, application of principles for limited applications, etc.) for the application of hydrologic or soil science principles to the performance of professional services in related fields. Wetland scientists or other professionals who apply hydrology or soil science in their profession for less than the stated threshold should be exempt.
3. Refine the definitions for the practices of hydrology and soil science to exclude any practices that utilize principles of hydrology and soil science in interdisciplinary applications.
4. Temporarily exempt wetland scientists from the need for a license under the areas covered by the Board while a licensing program is developed for them.
5. Clarify the rules as to how one can legally perform work that makes marginal application of hydrology or soil science. For example, if work is performed under the auspices of a company or agency that employs other professionals who are licensed, would those professionals have to be present in the field, or just review results? Would their signature be required?

October 13, 1999

I would be happy to work with the Board to refine these options or to develop other viable means to fully address the issues my colleagues and I have raised. I can be reached at 608-245-7190.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth A. Day".

Elizabeth Day
Professional Wetland Scientist

cc: ~~Sen. Robert Wirch~~



WISCONSIN LEGISLATURE

P. O. Box 7882 Madison, WI 53707-7882

October 18, 1999

Joan E. Underwood PG, Chair
Examining Board of Professional Geologists, Hydrologists and Soil Scientists
1400 E. Washington Ave.
Madison, WI 53708-8935

RE: Senate Clearinghouse Rule 99-088, relating to the registration and regulation of professional geologists, hydrologists and soil scientists

Dear Ms. Underwood:

We are writing in response to Stephen Donohue's letter of October 7 regarding modifications to CR 99-088. The modifications would exempt scientists performing wetland delineation from licensure by the Examining Board of Professional Geologists, Hydrologists and Soil Scientists.

Although the Senate Committee on Economic Development, Housing and Government Operations hasn't taken formal action on this modification, we are requesting that the board consider exempting from licensure wetland scientists who are certified as Professional Wetland Scientists (PWS) by the Society of Wetland Scientists. This exemption would cover only the activities recognized under the Society's Professional Certification Program guidelines.

We hope that this change would be a fair compromise between the requirements of the Examining Board of Professional Geologists, Hydrologists and Soil Scientists and the needs of our state's wetland scientists.

Thank you in advance for your consideration. If you have further questions or comments, please feel free to contact us.

Sincerely,

RICHARD GROBSCHMIDT
State Senator
7TH Senate District

TOM HEBL
State Representative
46th Assembly District

RG: jw

CC: Senator Robert Wirch
Representative Eugene Hahn
Albert Hall, Director, Bureau of Business and Design Professions

October 15, 1999

Mr. Steven V. Donohue, P.H.
Examining Board of Professional Geology, Hydrology and Soil Science
Department of Regulation and Licensing
1400 East Washington Ave.
P.O. Box 8935
Madison, WI 53708

Subject: **Senate Clearinghouse Rule 99-088 Relating to the Regulation and Licensing of the Professions of Geology, Hydrology and Soil Science**

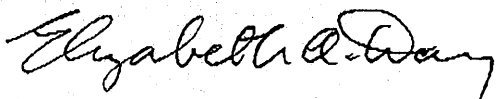
Dear Mr. Donahue:

It has come to my attention, since my recent letter to you (dated October 13, 1999), that the Department of Regulation and Licensing (the Department) is considering exempting from the licensing requirements those wetland scientists who are certified as Professional Wetland Scientists (PWS) by the Society of Wetland Scientists. In addition to the options I recommended in my letter of October 13, I would consider this PWS exemption to be an equally acceptable remedy for the problems created for wetland scientists by the above-referenced proposed rule. I applaud your consideration of this type of exemption and encourage you to include it in the revised rule.

It has also come to my attention that there may be some reluctance within the Department to include this type of exemption if it will mean that wetland scientists will be designing and monitoring hydrological aspects of wetland mitigation designs. It is imperative that wetland scientists not be prevented from engaging in this portion of our practice, provided each individual is providing services within the scope of his or her training and expertise. If you do have concerns regarding this aspect of the practice of wetland science, I would encourage you to voice those concerns so that my colleagues and I can assist you in developing a mutually agreeable solution.

Once again, I do understand the difficulty of addressing this situation in the rule-making stage. However, I feel strongly that a solution favorable (or at least acceptable) to all parties can be worked out, provided there are adequate opportunities to dialog. Please feel free to contact me at 608-245-7190.

Sincerely,



Elizabeth Day
Professional Wetland Scientist

cc: Sen. Robert Wirch

6429 Maywood Avenue
Middleton, WI 53562

URS Greiner Woodward Clyde

Fax Transmission

A Division of URS Corporation

To: Sen. Ulrich

FAX No. 267-0984

Representing: Comm. on Econ. Devel, Housing, & Gov. Op

From: Betsy Day

Date: _____

URS Greiner Woodward Clyde

5250 E. Terrace Drive, Suite J

Madison, Wisconsin 53718

• Phone: (608) 244-5656 •

Fax: (608) 244-1779

TRANSMITTAL: 4 pages total, including cover sheet.

Letter

Drawing/Sketch

Other: _____

ACTION REQUESTED: For Review and Comment

For Approval

FYI only

Please Respond VIA: Phone: _____

Return Fax

Letter

Message:

cc. RE: Cleaninghouse Rule 99-088

Confidentiality: This transmission is intended solely for the person or firm to whom it was addressed. If you received this fax in error, please destroy it and notify us immediately. Thank you.

October 13, 1999

Mr. Steven V. Donohue, P.H.
Examining Board of Professional Geology, Hydrology and Soil Science
Department of Regulation and Licensing
1400 East Washington Ave.
P.O. Box 8935
Madison, WI 53708

Subject: Senate Clearinghouse Rule 99-088 Relating to the Regulation and Licensing of the Professions of Geology, Hydrology and Soil Science

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Middleton, WI 53562

- 2 -

October 13, 1999

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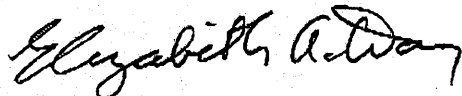
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October 13, 1999

I would be happy to work with the Board to refine these options or to develop other viable means to fully address the issues my colleagues and I have raised. I can be reached at 608-245-7190.

Thank you for your consideration.

Sincerely,



Elizabeth Day
Professional Wetland Scientist

cc: Sen. Robert Wirch

**Natural Resources Consulting, Inc.**

Specializing in wetland, biological and environmental permitting services

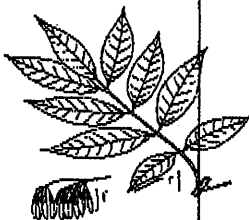
2520 Peiper Road, #4
P.O. Box 128
Cottage Grove, Wisconsin 53527-0128
phone: 608-839-1998
fax: 608-839-1995

Fax

To:	Alfred Hall, Reg. & Licensing	From:	Scott Storlid
	Tom Hebl		
	Chuck Chvala		
	Robert Wirch		
Fax:		Pages:	3
Phone:		Date:	October 13, 1999
Re:		CC:	
<input type="checkbox"/> Urgent	<input type="checkbox"/> For Review	<input type="checkbox"/> Please Comment	<input checked="" type="checkbox"/> Please Reply
			<input type="checkbox"/> Please Recycle

● Comments:

This issue is still very disconcerting to state wetland scientists and wetland regulators and has yet to be resolved. Please call me with questions.



Natural Resources Consulting, Inc.

Specializing in wetland, biological and environmental permitting services

2520 Peiper Road, #4
P.O. Box 128
Cottage Grove, Wisconsin 53527-0128
Phone: 608-839-1998
Fax: 608-839-1995

October 13, 1999

Examining Board of Professional Geologists, Hydrologists, and Soil Scientists
C/o Mr. Alfred Hall
Department of Regulation and Licensing
P.O. Box 8935
Madison, WI 53708-8935

Re: Chapter 470 Wisconsin State Statutes
Registration of Professional Soils Scientists and Hydrologists

Dear Mr. Hall:

I wanted to thank you for allowing myself and other wetland scientists the opportunity to speak at the meeting of the Examining Board for Professional Geologists, Hydrologists, and Soil Scientists regarding the scope and practice of wetland science. I understand that draft rules have been developed for Act 300, Chapter 470. As you will recall, the Act institutes licensing requirements for soil scientists and hydrologists. My understanding of the draft rule is that it exempts persons completing wetland mapping only. As a group, wetland scientists have identified numerous other services and tasks that we provide to clients in the area of wetland science. As we attempted to illustrate at your meeting, wetland mapping is only one of the many services wetland scientists provide. I can't help but wonder if anybody has been listening for the last 11 months while myself and other wetland scientists have presented over and over in telephone conversations, meetings, and letters that wetland science is an interdisciplinary science and that wetland scientists do more than map wetlands? Additional services include wetland functions and values assessments, wetland restoration planning, wetland mitigation design, wetland monitoring, all regulatory-driven activities under various state and federal laws. Even with the proposed exemption for wetland mapping, I will still be in violation for providing other wetland-related services. This is unacceptable.

The rule needs to exempt qualified wetland scientists completing wetland delineations, wetland and water resource permitting, wetland functional assessments, wetland mitigation/restoration design, and wetland monitoring using currently accepted state and federal guidelines.

I believe that the longer-term solution is to modify the definitions of soil science, hydrology, practicing soil scientist, and practicing hydrologist. These definitions should *realistically* describe the core of these sciences and practices. As currently written, they will most certainly have unanticipated adverse affects on the environmental consulting industry (especially small businesses like mine), the environment, and the general public. I also believe they are in direct conflict and will adversely impact the implementation of section 404 of the Clean Water Act, Chapter 30 of the Wisconsin State Statutes, and NR 103 of the Wisconsin Administrative Code. I am certain that the services provided by my company for compliance and permitting under these regulations, were never intended to be regulated under the definitions in

Alfred Hall
October 13, 1999

Chapter 470. As you can see from my letterhead, I do not advertise as a soil scientist or hydrologist; however, your definitions have reached out and grabbed me.

It is still important to note that by solely exempting wetland delineation from the licensing requirement, my business will still endure a significant adverse impact. In fact, it could still result in the end of my business altogether.

Thank you for taking the time to read this letter. Please call me at (608) 839-1998 if you have any questions.

Sincerely,

Natural Resources Consulting, Inc.



Scott A. Storlid, WPIT
Principal Scientist / Environmental Planner

Cc: Senator Robert Wirch
State Senator Chuck Chvala
State Representative Tom Hebl



September 1, 1999

Ms. Joan Underwood, Chairperson
Board of Professional Geologists, Hydrologists
and Soil Scientists
Department of Regulation and Licensing
1400 East Washington Avenue
Room 281
Madison, WI 53703

Dear Chairperson Underwood:

The Senate Committee on Economic Development, Housing and Government Operations held a hearing on August 17, 1999 on Clearinghouse Rule 99-088 relating to the licensure and regulation of professional geologists, hydrologists and soil scientists. As you are aware, the purpose of these rules is to implement 1997 Act 300 and to specify requirements and procedures applicable to each of the sections of the Examining Board of Professional Geologists, Hydrologists and Soil Scientists (Examining Board).

As a result of testimony received at the public hearing and subsequent discussions, the committee is requesting under s. 227.19 (4) (b) 2., Stats., that the Examining Board consider modifications in the proposed rules.

The committee requests the board to consider modifying the rule in the following areas:

1. Clarifying s. GHSS 4.04 (1) to permit the board to consider additional post-baccalaureate degrees besides bachelor's degrees, such as master's and doctorate degrees.
2. Clarifying that the defined areas of practice do not include the practice of wetland delineation engaged in wetland ecology so that such persons can provide their services without risking prosecution for practicing "geology," "hydrology" or "soil science" without a license.
3. Revising the rule to assure that the terms "registered" and "licensed" are used consistently throughout the rule.
4. Revising the rule to correct internal statutory references in ss. GHSS 2.06 (2) (a) and (b), 2.06 (3) (a) 2., 3.03 and 4.03.

Under the statutes, if the agency agrees in writing to consider these modifications prior to September 8, 1999 then the review period for the Senate and Assembly Committees is extended

State Capitol, P.O. Box 7882, Madison, Wisconsin 53707-7882 • 608-267-8979
Toll-Free Office Hotline: 1-888-769-4724
Email: Sen.Wirch@legis.state.wi.us • Fax: (608) 267-0984
Home: 3007 Springbrook Road, Kenosha, Wisconsin 53142 • (414) 694-7379

September 1, 1999

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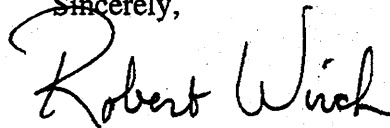
Chairperson Underwood

-2-

to the 10th working day following receipt by the committees of the modified proposed rule.

If you have any questions regarding this request, please feel free to contact me directly at my legislative offices.

Sincerely,

A handwritten signature in cursive script that reads "Robert Wirch". The signature is written in dark ink and is positioned above the printed name and title.

Senator Robert Wirch
22nd Senate District

RW:tr