

**Response Summary for Public Comments Received on
Surface Water Grants Program Guidance and Application Revisions
July 7-28, 2015**

Summary of Changes Based on Public Comments:

Thank you to all of the individuals and groups that provided feedback on the Department of Natural Resources (Department) proposed Surface Water Grants Program Guidance and Application. There were 13 comments received. The Department made the following changes based on the feedback received:

1. Changes to Application

- a. General Edits
 - i. Incorporated several suggested spelling, grammatical and syntax suggestions to improve readability
 - ii. All links have been updated
 - iii. Further clarification provided on county-wide map requirements, authorizing resolution submission, and character limits
 - iv. Added link to Natural Heritage Index website for grantees to identify rare species within project area.

2. Changes to Guidance

- a. General Edits
 - i. Incorporated several suggested spelling, grammatical and syntax suggestions to improve readability
 - ii. Added consistent wetland language
 - iii. Ranking sheets updated for consistency to award points for first time projects and meeting with appropriate DNR staff
 - iv. Still reviewing Healthy Watershed Assessment and may include it into ranking criteria in the future
- b. Aquatic Invasive Species Grants
 - i. Added \$10,000 category for AIS Education, Prevention and Planning Grants
 - ii. Further clarified Clean Boats Clean Waters grant applications.
 - iii. Changed the goal in Established Population Control grants from eradication to control
 - iv. Linked to University of Wisconsin Lakes Extension website for developing a contingency fund for Prevention Control and Contingency Planning
 - v. Further clarified that Point Intercept Plant Surveys need to include voucher for all specimens
- c. Lake Grants
 - i. Added a \$10,000 category for Lake Planning Grants
 - ii. Removed organization assessment from Large Scale Lake Planning Grants

If you have any questions regarding these changes, please contact Shelly Thomsen at 608-266-0502 or Shelly.Thomsen@Wisconsin.gov

Final grant forms and guidance have been posted on <http://dnr.wi.gov/news/input/guidance.html> and are available in hard copy by request.

Following is a compilation of comments received by the Department on this matter.

Comments Received

1. Korin Franklin, AIS Outreach and Education Specialist, DNR (7/7/15)

(920)420-0357

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Application suggestions attached

Please find comments about the application attached. The only other issue I noticed was in the "Surface Water Grant Application Instructions". The first link listed (highlighted below) does not work.

" How to Prepare

Before completing your application, thoroughly review the application guidelines and talk with your regional Department of Natural Resources (DNR) Surface Water Coordinator AIS/Lake/River Coordinator and/or Environmental Grant Specialist."

2. Jim Brakken, Bayfield County Lakes Forum President (7/8/15)

treasureofnamakagon@gmail.com

I have struggled with the DNR grant process for nearly two decades, writing, I believe, 2 lake management grants, 5 AIS grants, and 6 small education grants for an estimated total of \$90k.

From the first grant I wrote in 1997 for the Round Lake District and the New Auburn School District, I've found the DNR's process cumbersome and clumsy and it has required many, many hours of time that could have been used for efforts potentially beneficial to our lakes and/or to the students I've involved in these efforts.

It is good to see DNR's interest in streamlining the process. However, if DNR truly wishes to make the process user-friendly, there's much more to be done.

Those who have applied for and rec'd grants from other venues AND from DNR tell me the entire DNR process is far more difficult than need be. Yes, I understand the need for documentation and accountability. Still, most of us on the "applicant" side of the fence agree that DNR makes the process very difficult from start to finish, esp for the citizen lake organizations who are DNR's best partners when it comes to protecting our lakes, streams, and watersheds.

One item of concern: When applications are being reviewed for approval and found to be lacking adequate points, the applicant should be informed and given an opportunity to offer additional input. This business of the DNR lake grant liaison telling the applicant the grant ap will fly--then later announcing it was rejected--is wrong. Perhaps an email to the applicant asking for clarification or pointing out a deficiency could result in a successful application. All "borderline" grant aps should receive this consideration. Keep in mind, each time DNR rejects a grant it risks putting important, valuable work on hold and also risks discouraging citizen volunteers from further participation.

Yes, the revised forms are better--a needed first step in making DNR's surface water grant process user-friendly for citizen volunteers who are your best partners. But it is time to put more emphasis on streamlining and less on bean counting.

Thanks for your efforts to improve the process

(7/9/15)

Re deadlines, the previous practice of a summer and winter deadline was better because if the first was denied, there was an option to re-apply. Now, if we are denied, we must wait a year.

3. Frank Pratt, consultant Fisheries Bio-Technology Prescriptions (7/8/15)

Fpratt32@gmail.com

Shelly: I totally agree with everything Jim says. The process is still cumbersome.

Most importantly the selection process is very murky. I am tempted to use the term "Voodoo-Secret-Treaty". In my 38 year career as fisheries scientist with WDNR I wrote over 300 fisheries grant proposals under internal, project base funding. My success ratio was close to 100% and there were biennia where I actually had to turn back projects because of man-power limitations.

Then, after I retired I got out in the private sector consulting with or acting as an agent for, among others: Couderay Waters Regional Land Trust (CWRLT), Couderay Lakes Association, (COLA), Namekagon River Partnership (NRP), Wild Rivers Chapter of Trout Unlimited, City of Hayward, etc.. My grant application success came way down- something like 4 granted versus 3 rejected, so far. I admit, some of the problem may be my skills in evolving from fisheries to a broader watershed concept. A little humility never hurt anyone, so I hope to learn from my failures.

However, I do think that much of the problem is in the process: Especially the lack of a feed-back loop to make changes part. (Which Jim mentions relative to Regional staff giving the green light only to have the project crash and burn at the statewide funding review level. WITH NO OPPORTUNITY FOR THE APPLICANT TO RESPOND, BECAUSE THE NEXT TIME THE APPLICANT HEARS ANYTHING IS THE REJECTION NOTICE. It happened to me. So, I agree with Jim completely- this is flat-out, WRONG.

The worst is to have a project NOT EVEN RANKED, even considered for funding- and then not finding out about it until AFTER funding had been allocated to other (possibly more worthy projects- but who would know if you were not allowed to compete anyway), Fair-play should include the chance to play.

In lake planning, there is some type of terrible disconnect between the field, central office, and the rating teams relative to what is PLANNING and what is MANAGEMENT. This might not be so important except that the money pot is divided up that way, and the due dates for application and funding cycles are totally different. (I do understand why you have to do the two-tiered application cycle- you are overwhelmed. Having worked in the system I get that.)

But, there is no excuse for the advising field staff to agree with the applicant on whether the grant is management or planning, only to have central office or the rating teams rule otherwise, and throw the project out of consideration because they think otherwise. If the project passes field-muster at Region and is forwarded on for funding consideration at Statewide level, then project should be considered as what the applicant and regional field-staff agreed it was (management versus planning).

This year, I spent three man-months putting together two very good, comprehensive programs for COLA and NRP. One (COLA) ranked low as a plan because it was not comprehensive enough. (At least it

was ranked). The NRP grant was submitted as river management- but was not even ranked. Why? Because at funding ranking it was thrown out of consideration because someone determined that it was too comprehensive- and therefore more of a "Plan". This put it in the wrong submittal cycle. Inexcusable.

I encourage Lake Grants to consult with Ann Loechler or Ed Skaminsky in other State and Federal Grants: These problems do not seem to exist in their programs. In both there is a clearly spelled out points system, and applicants who fail to meet the initial cut, ARE given a second chance to modify their grant proposal. One major inequity in their programs is the urban bias. Proposals close Madison or Milwaukee are automatically allotted 2-3 more points than those coming out of a low population, rural area, like Hayward. I do not know if the Lakes program has a similar bias. From a resource management standpoint it makes zero sense. Where the resource is and where the users go to recreate ought to trump where the users live and work, right? If anything, if there is to be any type of demographic/geographic priority it should go to lake and river rich areas.

And this incredible bias towards AIS. Up to 70% of the budget spent to kill weeds!?! Really? AIS is important. But it does not trump watershed, nutrient and run-off management, buffer zones, comprehensive land use, local networking, and other, real management for real issues. And oh yeah- I can utter it because I am retired and my first amendment rights are still intact: "Climate Change". The biggest, worst, villain on the block. Unless you are in Institutional Denial which appears to be the case for WDNR Management.

What is very right and very good with the Lake Grants program is the quality, dedication, and service ethic of staff, especially field staff. And that means that you have it at least 80% correct. I cannot say enough to give proper due to Jane Malischke, Alex Smith, Pam Toshner, and Craig Roesler, amongst others.

Thank you for the opportunity to comment on Surface Water Grants.

(7/10/15)

The actual form is not that bad, in fact way better than many I have struggled with over the years.

My beef is with the artificial segregation of Plan from Mgt. Many proposals are a mix of both. In fact if they are adaptive management they better be both. I like Jim's idea of two deadlines, with the second open to reapply-rejects. I guess that means that both Mgt and Plan would be eligible at the first Dec. deadline. Knowing that you split the two for workload considerations I can see that you might not want to return to the old system of essentially one deadline. I might be satisfied if I could be assured that when the applicant and field staff agree on whether the application is a plan or a management prospectus that that judgement holds through the rest of the ranking/.funding process.

Maybe first deadline is rivers and second is lakes and river re-apply???

No matter what happens you can't have an applicant spend hours on a very good proposal, which the field supports and forwards to ranking- only to have it kicked out of ranking because Plan vs. Mgt. judgement shifts in the end-game. That is not fair play, not good customer service, and not good resource management, either.

Another suggestion for the form, per se. There is more transparency in the process if the applicant knows the weighting system. Are all items equally weighted or do some have higher priority. As in for example:

How relates to other Plans (1 point)...
Partners (2 points meaning 2X weighting)...etc..

The guidelines sort of allude to that, but why not spell it out up front so all the applicants know and follow the same priority system. Some of the State Grants which Ann Loechler administers are so structured. That is how I found out about the urban bias which I railed against in the last e-mail. I bet that the points system falls within Jim Brakken's definition his definition of transparency. It also would encourage consistency at the ranking/rating stage.

Thanks again for the opportunity to comment.-Frank Pratt

4. Brock Woods, Wisconsin Purple Loosestrife Biocontrol & Wetland Invasive Plant Programs, DNR (7/8/15)

Brock.woods@wisconsin.gov

My initial concern that I have expressed before is that for AIS grants I haven't seen any statement, especially at the start, that specifically says wetlands are valid waterbodies, and thus are fair game for any type of AIS grant. In most statements the word "waterbody" is used exclusively, but in a couple other places the text says "waterbody or wetland". Thus, it is at least confusing to some—perhaps many—readers as to whether all wetlands are always intended to be suitable for the particular AIS grant or not. Easiest would be to simply state this at the start, rather than using "waterbody or wetland" wherever reference is made to place. I'll keep perusing to perhaps make more suggestions.

5. Amy Thorstenson, Executive Director of Golden Sands Resource Conservation and Development Council (6/18)

Carroll, Jane, Bob,

I would like to provide the following feedback on our impressions of the AIS grant review process. Some of this you have already heard in person, but here it is in writing for future reference:

- 1) Need more room to provide the required information - you've heard this from multiple entities, I know. We did our best to abbreviate, but still felt like we were likely not fully explaining the program.
- 2) Application vs. Ranking guidance - We review the ranking guidances to ensure that we are providing all needed information. However, the application and the ranking guidance to not really match up. This leaves us wondering where to best insert the needed info, where it best fits. It also leaves the grant ranker hunting for the info that scores points. If the two forms followed each other, it would help us provide what you need in a clearer manner, and help the ranker work through the application faster and more accurately.
- 3) Comments on feedback we heard on our ranking of our East Central Regional AIS Program, where we scored poorly:

Section A) "unclear the number of workshops and where" - Two thoughts on this criticism: First, if we knew that that sort of detail were needed, we would have provided it. Second, there was no room to provide it, had we known.

Section B) "Public Access maps sent took too much time to review" - Our regional AIS programs are multi-county programs, therefore we cannot provide public access maps for the entire county that are of reasonable resolution for printing on an 8 1/2 X 11 page. So, instead, we provide links to the county websites where public access info is being made available to the public. We have been told for years that the goal of this grant requirement is to do just that - provide the info to the public. We are achieving that, and providing links to these resources has been sufficient in the past. It is unfortunate that we lost points for providing this requirement in what seemed the most logical and reasonable manner for our situation.

Section H) "RC&Ds are part of the county, so why would that match count?" - First, this is entirely incorrect, we are NOT part of the county, not supported by county dollars (with the exception of a \$250 annual membership fee), we are an independent non-profit. Second, this misconception cost us several precious points. There was supposed to be a final review process that reconciled such outliers in the ranking. It would seem this low ranking for our East Central Regional AIS program would have surely seemed erroneous when considered next to our South Central and West Central Regional AIS programs, being essentially identical programs.

We look forward to continuing to provide quality, cost-effective partnership in the fight against AIS. I hope our comments can help to some degree.

Thank you,

6. Bill Miller, President of Big Chetac and Birch Lake Association (7/8/15)

Millerwf@uwec.edu

Hi Shelly

I have taken a few hours and gone through all the materials. It really looks great and is much improved over the old process. We are going to be applying for another AIS Treatment Grant this next time around, so this is quite timely.

While everything is much better, I am wondering if it would be possible to integrate the ranking criteria with the application instructions. Those two things are really tied together. I know from experience, in it took us three attempts (applying three separate times) before we were able to write a successful application. My suggestion may not be feasible and that is fine.

I do have a question for you. Has there been thought to modifying the ranking criteria? Specifically, there has been a push to clean up lakes with high levels of phosphorous, yet that does not appear to be built into the criteria. There is a list of impaired waters, so I would think that would be an easy way to identify those water bodies.

Thanks, and again, really well done.

7. Steve Meidl, Pigeon Lake of Manitowoc County (7/14/15)

slmeidl@gmail.com

Shelly,

This is in response to the WDNR Surface Water Grant application Materials dated July 7, 2015. It appears there has been no change to the grant size categories, specifically including a category of \$10,000 and under. The DNR has an obligation to help protect the Lake efforts that fall under this small size category. However, it appears it'll be next to impossible for Lakes that have a "small" need (but a lot for the Lake owners to bear) to compete for Grant dollars against large lakes. Our request is for the DNR to bring back the small grant category of \$10,000 and under so we can continue implementing our Lake Management Plan.

Thank you for your consideration.

8. Walt Ebersohl, Environmental Grants Specialist, DNR (7/14/15)

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Hi Shelly;

I read through the Surface Water Grants Proposed Guidance Document to p. 43 and wrote down typos, grammatical errors I observed as I went along.

- 1) P. 7 2. First sentence. Under ~~ch.~~ ss. NR 190.05
- 2) P. 9 Paragraph beginning with Units of government. Second sentence. The categories of applicants below must meet certain qualifications in order to be considered eligible .(add period) ~~s~~ Sponsors (new sentence)
- 3) P. 9 Qualified River Management Organizations. Last sentence of page needs a period.
- 4) P. 11 Priorities and Funding Considerations for All AIS Grants
 - a. Missing period after Early detection and response to pioneer populations of aquatic invasive species
- 5) P. 12 Eligible Projects
 - Development of AIS prevention and control plans .(missing period)
 - Monitoring... in ~~the~~ AIS prevention and control. (delete the)
 - Watercraft inspection. Second sentence. Specifically --- data collection and reporting
- 6) P. 13 Second paragraph. A checklist to assure ~~for~~ your Aquatic Invasive Plant Management Plan ...
- 7) P. 13 Item A.3 a. Use is not lined up. Recommend not capitalizing use.
- 8) P. 13 Item A.3 c. Recommend not capitalizing boat
- 9) P. 13 Item D. Postings. Need period after program.
- 10) P. 16 If participating... Purple Loosestrife bio-control projects (delete s)
- 11) P. 17 Procedures. Second sentence. ...or NR 109 permits (need space after NR 109)
- 12) P. 18 1e. Eligible Projects. Assess experimental ... techniques for ~~their~~ (should be the not their)
- 13) P. 20 Last sentence of page. A checklist ... can be found in _____
- 14) P. 22 2a. Purpose: Second sentence. These grants are well suited for beginning the planning process, conducting minor plan updates or developing plans and specifications .(add s)

- 15) P. 22 Eligible Projects. Specific monitoring and assessment projects. Collect and report ... for a Tier 1 assessments- (cross out s)
- 16) P. 22 Collecting and disseminating existing information ... lake use, ~~L~~lake ~~E~~cosystem (no caps)
- 17) P.22 Projects ... and s. NR 190.003(4) in the formation of goals
- 18) P.24 Organizational Assessments – Why is there discussion of river grant sponsors under Large Scale Projects?
- 19) P. 25 Last sentence of page. See Special... Easement Acquisitionfor (need space between Acquisition and for)
- 20) P. 27 Purpose: Wetlands and shoreland... or tributary to lakes (word missing after tributary – should it be streams)
- 21) P. 27 Eligible Projects:
Development of... environmental assessments~~s~~ (add s)
Public meetings... materials, mailings~~s~~ (add s)

Ineligible Projects:

Environmental cleanup, (remove comma)

Wetland Restoration

They improve... uplands towards-our waters (delete s in towards)

- 22) P. 34. Eligible Projects (3rd sentence). Adherence... as match to Clean Water Act Section 319 funds received by the DNR (word missing)
- 23) P. 36 Eligible Costs: Planning and engineering... that ~~is~~are necessary
- 24) P.38 Overview. First sentence. This grant program... to local organizations that ~~is~~are interested
- 25) P. 42 Land/Easement Acquisition
Note: See Special Requirement... or Easement Acquisitionfor (need space between Acquisition and for)
- 26) P. 43 Payment Options. Second sentence. If necessary 100% of the state share... may be disbursed in a non-interest bearing escrow account

p. 43 to the end of the Surface Water Grants Proposed Guidance Document.

- 1) P. 44. Enhanced appraisal Review process. 1st and 2nd sentence to be combined. Prior to submitting a grant application... for appraisal reviews_ to discuss grant requirements...
- 2) P. 44. Lake & River Protection Land Acquisition Conditions:
2nd sentence. These requirements are spelled out in the grant contract and in S. ch. NR 191 (lakes) or s. ch. NR 195 (rivers)...
- 3) P. 47. Relocation Plans 2nd paragraph, 1st sentence. Relocation plans may be necessary if the land being purchased makes ~~is~~ it necessary...
- 4) P. 48 3rd sentence. Plans need to be submitted...to the AIS Control grant application deadline to be eligible for additional grant funding.
- 5) P. 48. Sufficient information
 - Potential for long-term control of the causes of population growth? (word Is missing after population)
- 6) P. 49. Appendix C. 1st sentence. Use the following check list to ... for lake protection grants under s- ch. NR 191.
- 7) P. 49. An assessment of the lake's watershed including:
 - Listing of know point sources of pollution affecting lake or that ~~has~~ have affected the lake.

- A description of any management action, taken or that are in ~~progress~~ process.
- 8) P. 50. Appendix D.
 - Refers to item 2 immediately below (recommend numbering items rather than bullets)
 - 2nd box refers to paragraph 3?
 - An estimate of the amounts of technical and financial assistance needed, associated costs (add a comma after needed?)
 - 9) P. 51. Appendix E. Standard Authorizing Resolution. 3rd paragraph. Now, therefore be it resolved, that... and hereby ~~authorized~~ authorize and empower...
 - 10) P. 53 Appendix G links not provided
 - 11) P.64 A) Strategy. poor/fair/good/very good/exceptional do not line up with numerical scores
 - 12) P.65 Will conduct other complimentary source containment or preventive activities that go above and beyond the minimum level of boat landing inspection (e.g. boat washing or cleaning stations), such as augmented enforcement...
 - 13) P. 65 The majority (50%) of the project activity takes place on a water with AIS that has moderate risk of spread (lakes between ~~500-100~~ and ~~100-500~~ acres...; wadeable streams with public access or wetlands between ~~500-100~~ and ~~100-500~~ acres in public ownership).
 - 14) P.66. Attachments for Zebra Mussel, Spring Waterflea don't open
 - 15) P.67 Comments box is blocking text
 - 16) P.68. Note: on some of the ranking questions, fair and good are separate and on others they are combined (o.k. if that is the intent)
 - 17) P.70. J) Research. Assign 1 point if the project... project outcomes or the sponsor? is a participant...
 - 18) P.71 The project will conduct other complimentary source containment activities that go above and beyond minimum level of boat landing inspection (e.g. boat washing or cleaning station, augmented enforcement).
 - 19) P.75 Population Extent need to better define what is a high scoring project for this category
 - Projects on waterbodies with populations of invasive plants that are less than 10% frequency of occurrences should score low
 - 20) P.76 G) Complementary Management
 - Applicant demonstrates ... ecosystem. (Score 1 point per action, ~~provided~~ provide documentation).
 - 21) P.77 H) Community Capacity. In your review consider the extent to which this application:
 - Includes partnerships... (other than a contractor) that ~~is~~ has committed in writing
 - 22) P.79 Program Objectives. 2nd paragraph, last sentence.
 - Projects proposed by the sponsor ~~elsewhere~~ here ? distinctly separates projects
 - 23) P.79 A. Monitoring, Assessment. In your review consider whether:
 - The lake is recommended for TSI monitoring in a Watershed or other Department plan or strategy (add period for each bulleted item)
 - 24) P. 80 B. Education. In your review consider the extent to which this application:
 - Add period after each bulleted item
 - 25) P.80 - Provides information on lake ecosystems that ~~has~~ have regional or statewide significance or audience.
 - 26) P.80 C. Organization Development. In your review consider the extent to which this application:
 - Add period after each bulleted item
 - 27) P. 68, 81, 87, 96, 107 missing public access explanation - In your review consider the extent to which this application:
 - Explanation is missing before bulleted items

- 28) P.83 A. Comprehensive Management Planning
 - Completes or updates a comprehensive lake management plan that is consistent with the requirements of s. NR 191.45(2)...
- 29) P.84 Provides specific management objectives... or shoreland condition assessment_(add period)
- 30) P.84 Directly benefits ~~toward~~ the protection of state...
- 31) P. 84 Contains clear and quantitative habitat improvement goals... (the questions read a lot better if after In your review consider the extent to which this application ..., the bulleted items below start with a verb)
- 32) P.84 Has shoreland restoration goals that target severely degraded lots
- 33) P.85 C. Watershed Planning
 - Identifies surface runoff patterns... Assessments should be scale appropriate (i.e. Small watersheds should use LiDAR or best available local information)_(add period)
- 34) P.85 Develops a comprehensive assessment... Loading estimates from ~~gage-gauge~~ sites...
- 35) P.85 In your review consider the extent to which this application
 - Will conduct three parameter Trophic State Index monitoring ~~will be conducted~~ ...
 - Will collect and analyze a sediment core ~~will be collected and analyzed~~ ...
- 36) P.86 E. Impact. In your review consider the extent to which this application: (same comment as in #31 – the items below should be reworded to start with a verb)
- 37) P.87 F. Public Access. In your review consider the extent to which this application:
- 38) P.94 A. Water quality Improvement. For wetland restoration projects, consider the extent to which this application:
 - Includes a project site that has a direct hydraulic connection

For shoreland restoration projects consider the extent to which the project described in this application will

- ~~Project will result in the restoration~~ restore of a significant
- ~~Restoration~~ restore shoreline ~~goes~~ beyond minimum standards

There are several more ranking questions to the end where the bulleted items below do not start with a verb. In your review consider the extent to which this application: (see pages 95,96, 97, 105,107,108) -contains...

Also, a similar problem where the sentence starts --- In your review consider--- and the bulleted items below don't complete the sentence: (see pages 115, 118, 119)

9. Kristi Minihan, DNR Water Quality Standards Specialist (7/23/15)
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Hello; I'd like to submit a comment on the lake/river/watershed grant applications.

The DNR recently completed a "Healthy Watersheds Assessment" (HWA) tool which would be very in line with the goals of the grants program. I recommend that it be incorporated into your ranking process for various grant types where you feel it would be most appropriate.

The HWA is a large, multi-program effort to create a modeling tool (based on Wisconsin data) which predicts the overall health and vulnerability for each of the state's catchments (equivalent to HUC 16) and HUC 12 watersheds. It uses a broad range of metrics representing water quality, biology, habitat, etc, to predict which watersheds are the most healthy, and metrics such as water use, land use changes, and climate change to predict which may be most vulnerable to future degradation. The goal is to help

local groups and local governments to prioritize where they can most effectively implement protection and management practices.

I can see this information being useful in various ways for the grant ranking processes, and would like to discuss these possibilities with you. These could apply to small or large-scale grants, and planning or management grants. Some options include:

- For smaller grants for a single lake, you could use a checkbox to award an extra point or two if that lake is ranked as currently having high health and high vulnerability. This would indicate a strong need for protection efforts to maintain its high quality.
- For larger-scale planning grants on a watershed, county, or basin scale, the ranks of the individual catchments or HUC 12s can be used to prioritize where to target management efforts. If the applicant has done an HWA analysis and determined that certain parts of their planning area are most in need of protection or management practices, and their grant targets those areas with the appropriate practices, then they could be awarded additional points.
- Along with identifying areas that are “healthy but vulnerable”, the information can also be used to determine areas that are currently in poorer health but may not be particularly vulnerable to future degradation. This can be an indication that restoration practices in those watersheds may be more stable over time, and that the investment is more likely to result in positive, long-lasting outcomes. This type of scoring information could also be included if you feel it would be appropriate.

Thank you for your consideration, and I would be happy to talk with you in more detail. The HWA scores and maps are already available to the public online, along with a ranking spreadsheet. We can add additional tools to make it more user-friendly specifically for grant scoring purposes if that would be helpful.

HWA website: <http://dnr.wi.gov/topic/watersheds/hwa.html> (note: the mapping tool has recently been upgraded but not yet deployed online. The map tool linked on the website is an older version; the newer one will be more user-friendly.)

10. Tom Fratt, Ashland County Conservationist (7/27/15)

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My technician and I have reviewed the surface water grant application materials and offer the following comments:

1) General Application Section 1: Application Type. Our 2015 AIS EPP grant application (unsuccessful) included a component to conduct CBCW activities and we didn't feel that we should complete another application for just the CBCW program. However, there should be a mechanism for if the EPP application is unsuccessful, then the CBCW component could be rolled into a distinct project under CBCW. We lost all opportunity to ensure that a CBCW program was continued in Ashland County by having the same grant deadlines.

2) General Application Section 1: Application Deadlines. A county department like ours has multiple opportunities and needs for surface water grants, but the scarce staff time we have for preparing grant applications limits the number of grant we can realistically apply for. Having the two sets of applications deadlines so close together (Dec. 10 and Feb.1) makes it necessary for our department to "choose 1 deadline or the other". It would help us immensely if we had preliminary notification on the December

10 application by January 1 so that there may still be time to decide if we want to pursue a grant for the February 1 deadline.

3) General Application Section 3: Public Access: The instructions indicate that a map should be attached if you say yes. For a county-wide application, creating this map is a big job and the instructions go well beyond just identifying public boat launches. Do you really want every public access point in the county mapped? In Ashland County, that would include National Forest, County Forest, DNR lands, and National Park Service ownership. There is also the statement about explaining our good faith efforts to obtain the information, yet there is no place on the form to provide the justification.

4) General Application Section 3: Public Access: The instruction state to indicate how many public access points and parking spaces exist are available, but there is no place to record this information on the application. Again, this question does not seem to fit well with a "county-wide" application.

5) General Application Section 3: Pre-Application grant scoping consultation. The instructions contain additional detail for providing the name of the Department contact and the date of the meeting but there is no place on the application form to record that information.

6) General Application Section 6: Attachments. Please clarify the need for an authorizing resolution - does a new resolution need to be prepared for each grant application on an annual basis? If there is an application from a county, does the resolution need to come from the full county board, or is a resolution from the Land Conservation Committee (a standing committee of the county board) sufficient?

7) General Application, general comments: It is impossible to test the operability of the grant application based on the available review materials. There may be formatting issues and other glitches that will go undiscovered until we actually start filling out the application.

8) General Application/Instructions: The instructions indicate that Section 8 is the "project description", yet there is no section 8 provided on the application. Further, the application seems to use the Lake Management Planning Grants as the example - will all the grants use the same project description?

9) Instructions and character limits: I commend you for increasing the character limit in most sections, however, I feel that it will still be challenging to describe a county-wide program within the space limitations. Please clarify if the character limit applies "with spaces" or "without spaces".

10) Instructions and character limits: One of the drawbacks to having a form where "one size fits all" is that the examples don't hold in all situations. For example, on a county-wide application for an EPP grant, it would be extremely difficult to "Describe where the AIS population exists in the waterbody, the extent of the population and number of acres it covers." There are many examples where the information being requested in the narrative does not really apply to a county-wide EPP application. Perhaps there is a need to consider county-wide applications separately from others.

11) Instructions and character limits: #3 Methods and Data Collected. There are contradictions in this statement. Are only Department approved methods allowed, or are other methods allowed IF the process is described? With a low character limit (1000) on this question, it would be impossible to adequately describe the process .

12) Guidance Document: It is difficult to review a 122 page guidance document without having some indication of what was changed from previous versions, so I had to focus on the scoring criteria for the EPP applications.

- My biggest concerns are with A) Strategy and B) Prevention Impact because these questions have the largest point values yet seem to be the most subjective parts of the ranking. Particularly true for prevention impact - if the majority of the project activity takes place on a "Super Spreader" water body does it get scored exceptional?
- In 2015 there were major discrepancies between the published ranking criteria scores and the scores that were actually used by the reviewers. This needs to be fixed - must be consistently followed - and find ways to remove the subjectivity.
- The reviewers should have some ability to ask for clarification from the applicants if something is unclear - it may be the result of space limitations in the narrative rather than having a quality project proposal.
- Both Lake Michigan and Lake Superior are listed as Super Spreader waters however the large difference in number of counties between the 2 water bodies (30 or so for Lake Michigan, 4-5 for Lake Superior) makes it impossible for Lake Superior counties to compete on a level playing field. The DNR should seriously consider allocating the grants in a way that ensures that Lake Superior projects are funded. The very large but relatively poor and unpopulated counties of the far north do not have the same options for alternate funding that many other great lakes counties have.
- Page 67 - a formatting issue with the comment box for C) obscures the title for section D).
- I) Bonus: Is it really fair to reward a + with a bonus point? I would think if the DNR want to maximize their return on grants they would look toward entities with a proven track record and long-standing commitment.
- J) Reserch: Similarly, I don't think it is appropriate to assign a bonus point if the project has a reserch connection as this puts the rural northern counties at a disadvantage because we don't have the concentration of colleges and universities to partner with for reserch components of a project.

Thank-you for the opportunity to comment. I certainly hope that some of the concerns will be addressed before the next round of applications comes out.

11. Tim Hoyman, Onterra (7/28/15)

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Thank you for the opportunity to review the draft Surface Water Grant application materials. Below, I have included a list of my and our staffs' comments. That is followed by a composite text of the emails I sent out on February 19 & 20, 2015. I have included that text here so it is a part of the public record as it contains actual examples of many of the flaws we believe exist in the new ranking procedure. The composite email text is also referenced several times in the comments below.

First, I want you and your staff to know that we understand that you have been tasked with an incredibly difficult undertaking and that you folks are doing the best you can to complete it. We also understand that this is likely not the endpoint in the process of change, but a step in that direction.

Sadly, it is apparent to me, my staff, and numerous clients (some that received grants in the past and some that did not), that these changes are being implemented for reasons aimed at reducing the burden

on the department in disbursing the funds and administrating the grants. While the changes to the application format and ranking process may ease those burdens, based upon the results of the last two cycles and the changes seen in the documents reviewed below, I would have a very difficult time believing that an increase in the quality of projects being funded will be seen.

Surface Water Applicant Guide – AIS, Lakes, and Rivers Grant Programs Program Information, Resource, and Financial Guidelines

Page 13. Aquatic Invasive Plant Management Plan Approval – This section is misleading in that it may lead the reader to believe that an approved invasive plant management plan is all that is needed to be eligible for an AIS-Established Population Control Grant. Appendix B makes it clear that much more of a plan is needed to be eligible. For consistency, we recommend that the WDNR utilize the term “Lake Management Plan” or “Comprehensive Lake Management Plan” in place of “Aquatic Invasive Plant Management Plan or “Aquatic Plan Management Plan”. The use of these latter two titles has always led to confusion among lake stakeholders. The requirements in s. NR 198.40 (and Appendix B) lead to a lake plan and not just an aquatic plant management plan. Combining App B and App C would unify the planning requirements across the Surface Water Grants Program, reduce confusion in lake groups, and likely lead to better management of the lakes statewide. We understand that this may be difficult as there are two statutes defining the needs at this time.

Page 13. Separating AIS-EPP grant applications into greater than 50k and lower than 50k has always been an excellent idea. Doing so allows important non-countywide or regional projects to have a fair shake at receiving funding. However, not having the 10k or less category creates a funding gap for many important projects. For instance, a lake that has recently completed a management plan, but due to the size and density of an invasive plant infestation, a suitable control strategy is indefinable at the time because the infestation is too wide spread for realistic hand-harvesting and a large-scale spot treatment would lead to lakewide impacts. Additional monitoring is needed to see if the population will expand to a level warranting a whole-lake treatment or remain at its current level and possibly not require an herbicide treatment. If the lake in question is small, they will very likely not have an opportunity to receive AIS-EPC funds, so any treatment costs would be funded locally. The 10k or less category would allow them to conduct the proper monitoring and strategy development which in the end may steer them away from an unneeded large-scale treatment. The monitoring would not fit within a Small-Scale planning Grant and would be too focused to do well in a Large-Scale ranking. Not having the opportunity at the funding available with a 10k or less AIS-EPP Grant, may drive some groups just to complete a whole-lake treatment and skip the additional monitoring described above. A perfect example of this is found with Pigeon Lake in our February 19 & 20, 2015 email text included at the end of this email.

Page 13. Prevention, Control and Contingency Planning – The Assemble a Response Team: section is very good (as it was in past guidance documents). Point C recommends a contingency fund be established. Our experience has shown many lake districts believe that it is illegal to develop such a fund. A link to guidance or more information showing how a district can legally account for these funds in their annual levy and bookkeeping would be helpful.

Page 14. Funding Possibilities: - The final sentence in this paragraph indicates that a CBCW program can be funded under a larger project. I believe we were advised to guide our groups to fund the CBCW components under the separate grant. If that is the case, it should be clarified in this section.

Page 14. Early Detection and Response Grants – we believe the new language putting the eligibility of each lake for the program in the hands of the WDNR lakes coordinator based upon the more general guidelines of infestation size and duration is a better arrangement than past, more defined criteria.

Page 16. Established Population Control Projects – use of the term “eradicating” may mislead some groups to believe that eradication is possible. This is highly unlikely, if not impossible for a system that meets the definition stated in the sentence that follows in the same paragraph.

Page 16. Aquatic Invasive Species Plan Approval – please see first comment regarding Page 13 as it applies here as well.

Page 17. Maintenance and Containment Projects – Listing surveying, monitoring, reporting, and recordkeeping required by the DNR along with permit fees, but then limiting maximum grant amount to the permit application fee is very misleading. Establishing funding for DNR-required monitoring and reporting under this category would be more appealing to lake groups than just offering the reimbursement of permit fees.

Page 20. Lake Management Plan Approval – it appears that this section was cutoff because of a misplaced page break. Also, referring to it as a “Lake Management Plan” here is confusing and supports the comment above from Page 13. The term “Surface Water Grants” is being used to cover all grants, so terminology (and requirements as discussed above) should be the same across this document and others.

Page 21. Aquatic Plant Assessment – the use of a WDNR-generated point-intercept grid should be discussed in the section as well as the need to voucher all specimens found during the surveys. Vouchering should be completed by all surveyors, whether they are from a regional planning commission, RC&D, county, or even regional lakes coordinators.

Page 35. Lake Management Plan Approval – it appears that this section was cutoff because of a misplaced page break. Also, referring to it as a “Lake Management Plan” here is confusing and supports the comment above from Page 13. The term “Surface Water Grants” is being used to cover all grants, so terminology (and requirements as discussed above) should be the same across this document and others.

Page 62 & 63. Determining Local Cost Share for Training vs. Education – verbiage regarding the time spent by planning or steering committee members in developing the management plan should be addressed. This should include the development of the stakeholder survey, review of reports, and participation in planning meetings. Stakeholder participation is critical to the development of a management plan and the work provided by these volunteers should be eligible as a local cost share. There has been confusion on this topic in the past. Also, please consider including periodic information meetings that include progress reports for phased projects as a grant cost share. Many of our phased projects warrant annual updates at lake group general meetings about activities that have been completed as we progress through the phases. This keeps stakeholder awareness and volunteer participation up. Again, participation in these activities should be part of the local cost share and defined in this guidance document.

Appendix Ia – AIS-EPP Grant Ranking, A) Strategy – this is the AIS-Education, Prevention, & Planning category. Because an objective of this category is “planning” the wording should be “The degree to which the project includes *and/or will result in* a prevention and control strategy.”

Appendix Ia General comments regarding ranking guidelines and procedures:

- During the December 2014 and February 2015 grant application cycles, many inconsistent scores were assigned for the same grant by different reviewers. In several cases, funds were not granted to deserving projects. It appears as though a great deal of additional verbiage has been added to many of the ranking descriptions. Still, in most cases there is a range of points to be assigned at the discretion of the reviewer, but no guidance on how to assign the points. The added verbiage likely will not correct for the spread in ranking points because in most cases it does not add clarity in how the points should be divvied out.
 - For example, Large-Scale Planning Grant A. ranges from 0-7 points, but there are 10 total bullet points. Further, the first two bullet points are likely the most important considerations, but that is not clearly stated within the guidance. Either of those important aspects of the ranking could be interpreted as being as important as any of the others. In the end, a truly comprehensive project, without information related to the additional description verbiage may go unfunded.
 - Another example is in AIS-EPP B. and AIS-EPC B. There are 7 points available, but no indication of which bullet point is most important. There is a strong chance that no project would ever receive the full 7 points, so it is unrealistic to have that many points available.
 - A possible solution to this may be to add a ranking category that includes some of the additional descriptions so the points may be divvied as intended.
- In a number of the ranking descriptions within the Large-Scale Planning Grant section, it appears as though the outcome of the planning project, i.e., the plan, is already known or predetermined. In some cases the descriptions seem more appropriate for assessing the plan for approval. Much of this is new, but much is carry over from earlier guidance documents. In some of the cases, it appears as though the points would be awarded if the applicant simply listed the description in the grant application followed by, “if appropriate.” Below are some examples of the confusing language from description A and B:
 - Provides specific objectives for watershed or land use management (loading reduction strategy, identify critical sites, or develops land management ordinances). Award points for demonstrated capacity or capacity building to achieve implementation objectives.
 - Implementation matrix clearly defines stakeholder roles and commitments with time schedules and resource commitments (time, staffing, funding, etc).
 - Clear and quantitative habitat improvement goals, such as number of shoreline feet, trees, etc.
 - Shoreland restoration goals target severely degraded lots.
- In many cases, it appears that additional words have been added to the descriptions that will not aide, but actually deter, from consistency among reviewers. Inconsistent rankings decreases credibility in the process among your customers and does not meet the goals stated in the preamble. Further, many of the descriptions utilize what appear to be buzz words or social science jargon and as a result are difficult to understand their true meaning. For example (from Large-Scale Lake Planning A.):
 - Pathways to appropriate funding levels are clearly identified and discussed.

- Implementation matrix clearly defines stakeholder roles and commitments with time schedules and resource commitments (time, staffing, funding, etc).
- In both examples above, we do not understand what is being asked. Even if the description is understood, it may not be possible to include the information requested within the character-limited application form. Further and related to comment above – applicants may be able to simply add this verbiage into the grant application without an understanding of what it means and no real intention of meeting it.
- Overall, it appears that the use of the current ranking guidance will not lead to additional understanding among the reviewers and the end result will be similar to the inconsistent rankings produced during the December 2014 and February 2015 grant cycles. Please see the several examples included in the February 29, 2015 email text included at the end of this email. The inconsistent rankings lead to the following results:
 - Low credibility in ranking procedure.
 - Lack of transparency in ranking procedure.
 - Inability to defend final ranking score.
 - Inability of regional lakes coordinators to effectively guide their customers in creating high quality and efficient projects. By efficient projects, we mean projects that are not loaded with unneeded components just to receive funding.

Surface Water Grant Application Instructions and Form

Below are some general comments regarding the grant application instructions and form:

- Minimizing the project length to three years, especially in the case of AIS-EPC and implementation grants, could limit the knowledge gained and assurance the program was successful at meeting goals. For instance, an AIS-EPC project planning for an initial year of monitoring and strategy refinement, followed by a large-scale treatment in year 2, with hand-harvesting following in year 3, would not allow for post treatment monitoring in year 4.
- A consultation with the regional lakes coordinator is always a good step in developing the project proposal; however, taking the lakes coordinator out of the ranking process limits the effectiveness of the advice they can provide. Based upon the inconsistent results of the past two cycles, the coordinator may not be able to provide accurate advice on what should and should not be included in the project because it may not be recognized as a quality component by the reviewer. As discussed in the February 19 & 20, 2015 email text included at the end of this email, one way to increase consistency among reviewers of a project may be to have the reviewers teleconference with the lakes coordinator prior to the finalization of their rankings. In the end, the reviewer would determine the final ranking, but the discussion may bring the rankings closer together and allow the lakes coordinator to supplement information found in the application form with information gained at the meeting the coordinator had with the grant sponsors.
- With many lake groups not making the decision to move forward with a project until the beginning of September (Labor Day Weekend), and most consultants and lake coordinators being busy with fieldwork during the summer and fall, it may be unrealistic to try to have the scoping meetings 30 days prior to application completion.
- Not having a “live” grant form available limits our ability to understand how it will work and as a result, our ability to review it.
- Filling in the budget table is very time-consuming and brings about an opportunity for transcription errors. A solution maybe to allow the attachment of a simple Excel spreadsheet

using basically the same format. That way the computer could transcribe the project budget from the project cost estimate (client proposal) to the grant application budget (no human copying and pasting). A radio button could be added in the budget section indicating that the grant budget is being sent as an attachment.

- We appreciate it being clearly stated in Section 6 that only the attachments being requested will be considered in the review.
- Starting in Section 8, the layout of the instructions with specifics for each type of grant, as needed, is a substantial improvement.
- Parsing the Project Overview Matrix and the Activities & Timeline sections may be an improvement, but there are still severe character limitations that may hinder an applicant's ability to not only explain what will be completed, but as importantly, how it will be completed. It is easy to say that something will be done, but a part of this application process should be to demonstrate that the group completing the work can actually complete it well. The text for Additional Instruction by Grant Type:, under Lake Planning used 696 characters just to explain what should be included. Five hundred characters may fall very short in allowing for a decent explanation of what will be done in just one aspect of a complicated project.
- Not being able to include charts and tables within the application is limiting and often handicaps the applicant's ability to effectively and efficiently convey information and data.

Composite text from emails sent to 3 regional lakes coordinators and financial specialists on February 19 & 20, 2015 regarding the results of the December 2014 grant rankings

Note: Shelly Thomsen and Kathleen Hanson were carbon copied as well as several lake stakeholders from the three regions.

The recent changes to the AIS and Lake Management Grant Programs, now collectively titled "Surface Water Grants" have brought about a great deal of concern from me, my staff, and most importantly, our clients. During the preparation of the grant applications, utilizing the new forms and guidelines, we ran into a number of troublesome issues that I will cover in a separate correspondence that will include comments regarding both the December 10, 2014 deadline and the February 1, 2015 deadline. This letter describes the general concerns we have with the ranking process that was used for the December submittals in the AIS-Education, Prevention, and Planning Grants. With each issue we bring forth, we also do our best to provide a solution. This communication also describes our disagreement with the ranking that the Crooked Lake Area Lakes P & R District [Pike Chain of Lakes / Eagle River Chain of Lakes Association] received on the grant application we submitted on their behalf. There is no expectation that the ranking will be changed and the project funded; however, a response to our comments would be appreciated. Also, please note that while this email is addressed to you, the criticisms contained within it are not directed at you, but the department as a whole, especially those making the decisions regarding the process utilized to rank the grants.

Less Than \$10K Grant Category In the bulk of recent cycles, projects requesting a state share of less than \$10,000 were ranked separately, much like the less than \$50,000 state share requests. We rely on this category for specific, important projects that have limited scopes. For example, lakes that have recently completed a management plan, but the need for active management of AIS in the lake is not clear based upon the level of infestation measured during the planning project. Therefore, a small 2 or 3 year project is created to monitor the target species and assist the group with determining what type of control, if any, is appropriate. Without this intermediate step, some groups may decide to just jump

right into active management with herbicides when it is not necessary at that time. Pigeon Lake in Manitowoc County is an example of this type of project as is Silver Lake in Vilas County.

We also target that category when a lake group is in transition from an AIS-EDR Grant project where herbicide treatments have brought the target species to the level where only continued monitoring and hand-removal are necessary. However, as we have found to be the case with most lake groups, they are not completely comfortable monitoring the lake on their own for fear they may miss occurrences that could set back their progress. As a result, these groups would like to have a professional group monitor the lake once or twice a year and provide guidance on how they should move forward. As an added benefit, this type of project assists the lake group in understanding AIS management and leads them towards hopefully being able to manage AIS on their own in the future. Deer Lake in Lincoln County is an example of this type of project.

The solution to this issue is to always separate the projects requesting less than a \$10,000 state share out from the more expensive projects. This will allow these important projects to continue and bring about consistency to the grant program that is currently lacking.

Project Ranking Process Based upon our discussions with many WDNR staff members prior to December 10th and following the release of the grant ranking results, we understand that several substantial changes were made to the process in which the department used to rank the grant project proposals. No change to the process on its own likely overly affected the results, but the cumulative impact of these changes certainly led to significant inconsistencies and deficiencies in the final ranking priority list. These changes included; 1) the use of a range of points assigned to each ranking category, as opposed to specific point distributions within each category, and 2) the use of ranking teams that did not include the lake coordinator for the project's region.

Range of Points Assigned to Each Ranking Category In past grant cycles, each ranking category contained a list of priorities and/or questions, with each of those having specific point amounts assigned to them. Within the new process, the same guidance is listed within each category, but without specific points being assigned. We believe this change was made to provide flexibility to the project reviewer. However, it led to great inconsistencies between rankings within many of the categories. For instance, within the Anvil Lake project in Section A, one reviewer gave the section a 5, while a second gave it a 4, and a third gave it only a 1. The Town of Winchester project, in Section B, received a 5, a 5, and a 0. In Section A of the Pelican Lake project, points were assigned as 6, 6, and 3. Very large discrepancies also appeared in total project rankings that are quite alarming. For instance, the ECRPC-Winnebago Pool Lakes project, where one review totaled a 27 and the other a 19.5. The total rankings for the Oconto County LCD project were 26, 24, and 17, while the River Alliance project for St. Croix totaled a 21, 22, and a 30. Seeing these large differences discredits the process as being faulty. For example, if two reviewers that typically assign projects or certain aspects of projects with low scores were selected to review the same project, a worthy application may not get its deserved funding. Further, by using a range, there is a definite subjectivity added to the process, which robs it of transparency and the ability to justify specific rankings if questions are raised as we do below.

To decrease these discrepancies, better training should be provided to those completing the rankings. The lack of real training is a large concern for this past cycle as we do not believe the teams met until well into January while the applications were due December 10th and the rankings were to be completed by February. Also, instead of each project being ranked separately by each individual reviewer and then just turned in, perhaps each group of reviewers ranking a particular project should

get together and discuss their rankings and try to come to some sort of a consensus. They may not agree on all points, but if one reviewer assigned a 1 and the other a 6 during their initial ranking, after the discussion the assigned points may come closer together as a 3 and a 4. The use of group meetings to determine final rankings is elaborated on below.

Use of Ranking Teams without the Lakes Coordinator We agree with the use of non-lake staff to rank projects; however, as discussed above, those participants must be well-trained to understand the ranking priorities and how to assign points within each category. This was obviously lacking during the December 10th cycle as evidenced by the large differences in points assigned between different reviewers within the same category on the same projects.

Taking the regional lake coordinator out of the picture for ranking projects within his or her area is a serious mistake. The coordinators develop relationships and trust with the lake groups and other entities concerned with the management of the lake. The coordinators also know the history of the lake and its management. The lake coordinator's knowledge and understanding of the lake is important in the development of the project scope. Sponsors, and/or the consultants, are urged to discuss the project with the lake coordinator prior to submitting the project to assure it will get the best ranking possible. Handing the proposal off to other staff and excluding the coordinator from the ranking process short-circuits the coordinator's input and for the most part, renders it useless. The coordinator's knowledge of the lake and its history, as well as the sponsor, adds to the project proposal beyond what can be included within its narrative, especially with the new form's severe character limitations.

We suggest that the project proposal is provided to at least 3 other people for ranking. A consistent number of reviewers for each project would be best. Once they complete their rankings, they teleconference with the coordinator to go over the ranking. As they discuss their rankings within each category, they can ask questions and the coordinator can add information relating to the lake, its history, and its management goals. Each reviewer's total score, including that of the coordinator, would be used to develop an average score used in the final priority list. Please note that during the meeting, the individual reviewers would disclose their initial rankings, but would not be required to disclose their final ranking at the meeting's end. This would help prevent the coordinator from being overly pushy in trying to alter a reviewer's score. In the end, this would allow the lake coordinator's important knowledge to be included in the ranking of the project, but still allow for input from people outside the region.

In early fall after the new guidance and form were released for review, I received a phone call from a WDNR staff looking to discuss further the thoughts I had included in my review. I had a great deal of concern over how the new process was trying to use a cookie-cutter approach to submitting and ranking each project scope. I had strong reservations of how well the new form and process would work and voiced that I thought it would be a good idea to keep the current submittal process in place for the upcoming December and February deadlines, but request that several applicants apply in the normal fashion and utilizing the new form. All projects would be ranked using the early process, but the duplicates would be ranked using the new process for comparison. By doing this, issues brought about by the new process would not hurt the projects being ranked and allow the department to correct those issues before actually implementing the new process. She responded by saying they would be able to correct those issues after this round of grants. I found that disturbing and asked how she would feel if her daughter was applying to college and the college in question used a new, untested method for determining which applicants would be accepted. Under the original process, her daughter would be accepted, but due to a shortcoming of the new method, she was not accepted. The university promised

to correct the issue by the following year and her daughter should reapply. Waiting a year to start college or even going to another college could be a life-changing event. Following through on the analogy, it appears that several applicants in December's round or grants will not be going to college this year, when they normally would have been if it were not for the new process. Specific examples for the Crooked Lake System are described below. While some of the points are likely arguable, the discussion sheds light on real issues with the new ranking process.

Overall, it is clear that the WDNR moved in this direction to make the process more efficient. While the new form and ranking process may have made the grant procedures more efficient for administrative staff, it was done at the cost of the effectiveness and uniformity of the grant program. In addition, funding of less than adequate projects due to improper ranking will lead to additional time and effort on the part of the regional lakes coordinators; a group of folks who are already thinly stretched in their responsibilities.

Regarding the project discussed below, all discussion points below are made with reference to the WDNR Surface Water Grants Guidelines and Review Worksheet, which outlines the program objectives for this grant type into several categories (A through J).

Crooked Lake System [Northeast Region]

All discussion points below are made with reference to the WDNR Surface Water Grants Guidelines and Review Worksheet, which outlines the program objectives for this grant type into several categories (A through J).

- Section A: This project has CBCW (200 hrs for 2015), would train and deploy volunteers for AIS monitoring, would deliver professional report, and involves multiple waterbodies all with AIS (3 pts on previous ranking scale). Four of six bulleted criteria were met, while one was exceeded. One reviewer awarded 5 pts while one awarded 3. We feel a score of 4, potentially 5, should have been awarded to this project.
- Section B: System is between 500 and 100 acres and has exceeded minimum access. This qualifies for the second bulleted point on the Section B ranked list, which in past grant cycles was worth 3 points. White Potato Lake is 9 miles away with multiple boat landings and no AIS. This would qualify the project for additional point consideration under Section B's "vulnerable waters" bullet point. Reviewers awarded 4 and 2 pts out of a possible 7. We feel a score of 4 should have been awarded to this project.
- Section C: This project matches all bulleted criteria for Section C (produces updated management plan which is a deliverable, implements a Department approved AIS plan, includes lakes with above average aquatic plant FQI). Reviewers awarded 2 & 2 pts out of a possible 3. We feel this project should have been awarded a score of 3.
- Section D: This project includes a pioneer infestation of CLP. Regretably, this was not included within the text of this grant.

Consideration of these project rankings would have resulted in a score of 18, which would have allowed for funding of this project.

Eagle River Chain of Lakes Planning Project – Phase III [Northern Region – Rhinelander]

- Section A: The ERC project met 4 of 6 bullet points outlined in this section (delivers a professional monitoring report, multiple waters involved in project, has 200 hrs CBCW, addresses multiple AIS). This project received a score of 2 and 3 from the two reviewers out of a possible 8. We feel a score of 4 would have been fair.
- Section B: The ERC is listed as a “Super Spreader” on the Statewide AIS Source Water Lakes List (included in the worksheet). In past cycles, this designation has been worth 5 pts for this category. The bulleted criteria lists these waterbodies as having highest importance, with smaller systems ranking less. The ERC lakes are within 15 miles of many waterbodies; these waterbodies include large (>100 acres) lakes known to hold various AIS (N&S Twin) and some that hold no AIS (Big St. Germain) while having more than 2 boat landings. This would qualify the ERC for additional point consideration under Section B’s “vulnerable waters” bullet point. Therefore, we feel a minimal score of 5 or likely a 6 should apply to this section.
- Section C: This section outlines three criteria, 1) will produce a management plan, 2) implements a WDNR-approved AIS plan and 3) includes waters with high native biodiversity or critical habitat. The project would clearly produce a management plan and is called for within the ERC’s APM plan. Also, Vasey’s pondweed has been documented in 9 of 10 lakes and all have high FQI scores (outlined in previous phases). Thus, three bulleted criteria were met; however, the reviewers awarded scores of 2 and 3.
- Section F: The ERC has much public access, and as outlined within the grant application exceed the minimum access requirement in NR 1.91 along with other public access opportunities. Reviewers awarded 2 and 1 pts – we believe 2 is a fair score for this highly used system.

Consideration of these project rankings would have resulted in a score of 19, which would have allowed for funding of this project.

Town of Winchester Lakes Management Planning – Phase I [Northern Region – Rhinelander]

While we are pleased this project was funded, we would like to express a few concerns on this project’s ranking that we feel should be addressed in future grant ranking situations in order to provide a consistent and reliable method.

- This project was reviewed by 3 individuals. The reviewers awarded the project a 25, 24 and 15. This is a large difference by folks who were reviewing the same project with the same given criteria.
- Section B: Two reviewers awarded the project a 5, while one reviewer awarded the project a 0. The project includes Harris Lake (over 500 acres, has CLP) along with many waterbodies nearby which do not hold AIS but have public access. We agree with the ranking of a 5 by two reviewers, but are concerned as to how a reviewer could have ranked this project as a 0 as it seems even the smallest of waterbodies that meet NR 1.91 public access should receive at least 1 pt. Perhaps there is a misunderstanding by this reviewer, which should be addressed with the next grant review period.

Anvil Lake Management Planning Project [Northern Region – Rhinelander]

While we are pleased this project was funded, we would like to express a few concerns on this project's ranking that we feel should be addressed in future grant ranking situations in order to provide a consistent and reliable method.

- This project was reviewed by 3 individuals. The reviewers awarded the project a 18, 12 and 20. This is a large difference by folks who were reviewing the same project with the same given criteria. We cannot help but think what would have happened if 2 reviewers were assigned to this project, as some other projects had, instead of 3. If scores of 18 and 12, or 20 and 12, were awarded, the project would not have been funded (cutoff for AIS-EPP projects under \$50k was 17). The same could be said for many projects; the point we would like to make here is that consistency is important between all projects. We would propose that all projects receive the same number of reviewers for consistency sake.
- Section A: While many of the guideline worksheets sections had differences of 1 point, this section was given scores of 4, 1 and 5 by reviewers. This project trains volunteers to monitor AIS, delivers a professional report, includes 200 hours CBCW and addresses multiple waterbodies with AIS. With this, we would expect a minimum score of 4 points for this section.

Pike Chain of Lakes [Northern Region – Spooner]

- Two reviewers submitted scores of 12 and 15, yet the project was reported as having a final score of 16. How is this possible, seeing that the average of these two scores is 13.5?
- Section A: Project included AIS training workshop, professional monitoring report, AIS on multiple waters (worth 3 pts on past scale), and 200 hrs CBCW. Two reviewers awarded 3 and 3 points for this section while this project clearly meets 4 of 6 bullet points. We feel a score of 4 would have been fair for this project.
- Section B: The project area exceeds 500 acres and public access minimum by NR 1.91. This qualifies for the second bulleted point on the Section B ranked list, which in past grant cycles was worth 4 points. Additionally, several highly vulnerable lakes/streams are located nearby (Brule River 10 miles, White River 10 miles, numerous 1-boat launch lakes within 5-10 mile radius) that do not contain EWM or other AIS. This would qualify the project for additional point consideration under Section B's "vulnerable waters" bullet point. Reviewers awarded 2 & 4 pts out of 7. We feel that a score of 4 would be fair, with the potential for consideration of 5 since there are so many at-risk (do not hold AIS) waterbodies nearby.
- Section C: This project matches all bulleted criteria for Section C (produces updated management plan which is a deliverable, implements a Department approved AIS plan, includes ORW water with listed NHI species and above average aquatic plant FQI). Reviewers awarded 2 & 1 pts out of a possible 3. We feel this project should have been awarded a score of 3.
- Section D: This project includes a pioneer infestation in Flynn Lake, specifically mentioned in the grant form. One reviewer appeared to acknowledge this (2 pts awarded), one did not (0 pts awarded). As you pointed out during our project discussions this past fall, Pamela, this category

should be applicable to this project. Therefore, we feel this project should have been awarded 2 points from each reviewer for this section.

- Section E: A list of previous successful projects was supplied, along with mention of pre-application grant scoping consultation with WDNR. Thus both bulleted criteria points have been met. Reviewers awarded 2 and 1 points out of a potential 2. We feel as both bullet points were met, so the project should score a 2 in this section.

Consideration of these project rankings would have resulted in a score of 19, which would have allowed for funding of this project.

----- End composite email text -----

Again, thank you very much for requesting our input on the new grant materials.

12. Allison Werner, River Alliance (7/28/15)
awerner@wisconsinrivers.org (608) 257-2424

I only noticed one thing so it didn't seem worth submitting as an official comment.

In the Surface Water Grant Guidance, Pages 23-24, 2b Large Scale Projects (lakes)- Did you intend to put the organizational assessments information? Should this only be with the river grants, not the lake grant program?

Allison

13. Melissa Tumbelson, DNR Endangered Resources Review Specialist (7/24/15)
Melissa.tumbelson@wisconsin.gov (608) 267-0862

I review items that are up for comment to see if there are any issues related to endangered resources and/or data sharing. I noticed several references to listed species throughout the documents and I was wondering if you'd like me to prepare some information with a link to the Township data (<http://dnr.wi.gov/topic/NHI/data.asp?tool=township>). This is the website the general public can use to obtain NHI data generalized to the Town/Range level without needing to request specific data and paying fees. Is there another mechanism grant applicants have been using in the past to obtain the rare species data?

Also, I was wondering about adding some language and a link to the Endangered Resources Request Form for actual on-the-ground work that would be occurring as a part of these grants. Would you say that those projects would require other DNR permits (wetland/waterways, etc.)? If so, a review would be done as part of the permitting process and the additional information and link wouldn't be necessary.