McCord, Ashleigh I - DNR

From: Dick Andres [redacted]
Sent: Tuesday, January 15, 2019 10:15 AM
To: DNR WQSS APMSA
Subject: Pickerel Lake

It is really a bummer when you open a hole in the ice only to find weeds coming up in the hole. This is the Pickerel near the village of Pickerel. The same lake we are trying to bring back to a Walleye Lake. I have fished this lake since 1942 and find it the worst it has ever been.
Dick Andres
[redacted]
Appleton, Wi. 54915
[redacted]

McCord, Ashleigh I - DNR

From: John Bertelson Jr. [redacted]
Sent: Wednesday, January 23, 2019 6:43 AM
To: DNR WQSS APMSA
Cc: Schaal, Carroll - DNR; Eddie Heath; Tim Hoyman
Subject: Re: Aquatic Plant Management Strategic Analysis - Public Comment Period

Good morning.

Here are my public comments to the draft APM document. Overall, I found it quite informative and very much appreciate the effort in putting it together.

The comments are my opinion and do not necessarily reflect the views of the Lake Iola Lake District, although the comments are based on my involvement with the organization. In general, I support having as many options as possible when it comes to APM, as we try to balance accessibility with a healthy aquatic ecosystem for our lake. Exploring new options and effective communications are important to me.

- Chapter 8, Management Alternatives
    - Collaboration - support alternatives #1 for study group and #12 for research.
    - Department Resources & Workload - support alternatives #7 & #8 for certification programs, but against alternative #4 for multi-year herbicide permits. Plant communities in our millpond change too much from year to year, while mechanical harvesting areas remain consistent.
    - Public Outreach and Communications - supportive of all 8 alternatives, especially #6 to take into consideration the different types of lakes.
    - Program Tracking & Evaluation - supportive of both alternatives covering more data and further economic analysis.
    - Integrating New Information - supportive of alternatives #3 for team based approach, #7 for multiple control techniques and #8 to monitor non-managed lakes for natural variation.
    - Consistency in Evaluating Permit Applications - supportive of alternatives #4 for staff training, including creation of a handbook, and #6 to better define conditions that warrant APM.
    - Grants - support alternatives #6 to set limits on number of grants that go to one sponsor for herbicide treatments and #10 to prioritize projects that take a watershed-level approach. Against alternative #9 to eliminate APM grant funding, as that would probably lead to less or no plant management on our lake.
    - Misc. - support alternatives #1 for ecological stewardship, especially incentives for native shoreline plantings, and #8 for bidding process guidelines. Very supportive of alternative #2 for a classification system of lakes to determine what is allowed for APM. A millpond brings its own unique challenges to control plant growth that limits summer recreational activities.

- Recent drawdown examples on page 168 focus on the positive aspects, but our experience was different.

    - Lake Iola is a millpond and went through a two year drawdown from 2011 to 2013 in order to reduce excessive amounts of Eurasian Water Milfoil. The drawdown was successful in reducing the amount of EWM, but in its place the lake now has a nuisance level of native aquatic plants. From a summer recreational point of view, the drawdown failed. In fact, less points of the lake were accessible to survey plants during a comprehensive lake study in the summer of 2017 than during a similar study in 2006.
    - As far as reducing lake bottom sediments, the average depth gain was measured at six inches, but it was not uniform. Some areas did gain depth, while others lost. Some of the loss in depth did negatively affect a few lake property owners.

- It took longer than expected for the fishery to recover, even with stocking by the DNR.
- Our second year down led to a lot of problems for property owners with excessive reed canary grass along the shoreline. Additionally, small trees established themselves in shallower areas of the lake bed and have not yet died off five years later.
- The general feeling is that the benefits of a drawdown were oversold to members of the Lake District before deciding to go into it, and the negative experience will cause many to hesitate to use this tool in the future unless it becomes absolutely necessary to reduce EWM. At least we now have a better understanding of how a significant draw down impacts our lake ... both good and bad.

Thank you for your consideration.

Regards,

--

John Bertelson Jr.
Chairman, Lake Iola Lake Protection and Rehabilitation District
check out the Iola Lake District tab at [redacted]

On Wed, Dec 12, 2018 at 2:32 PM Schaal, Carroll - DNR <Carroll.Schaal@wisconsin.gov> wrote:

Good afternoon, quite some time ago you provided comments on our scoping document for this Strategic Analysis. I am happy to report we have completed a draft that is now ready for public comments. Thanks for your interest in Wisconsin's aquatic plant resources.

Carroll Schaal
Lakes & Rivers Section Chief
Bureau of Water Quality
Wisconsin Department of Natural Resources
101 South Webster Street, PO Box 7921
Madison, WI 53707-7921
(☎) phone: (608) 261-6423
(☎) fax: (608) 267-2800
(✉) e-mail: Carroll.Schaal@Wisconsin.gov

Customer Service Is Important To Us. How Are We Doing?
https://www.surveymonkey.com/s/WDNRwater

McCord, Ashleigh I - DNR

From: Chelsey Blanke [redacted]
Sent: Monday, January 7, 2019 1:09 PM
To: DNR WQSS APMSA
Subject: Climate Change Effects on APM Practice - Suggested Addition to WI DNR APM Strategic Analysis

Given the longevity of APM practice and policy decisions that could be built on the information presented in the Wisconsin DNR's aquatic plant management strategic analysis (noting that Wisconsin administrative codes regarding APM were last revised in 1989), the analysis could greatly benefit from a chapter that describes the likely effects of climate change on APM. For example, warmer temperatures are likely to exacerbate plant growth conditions which are or are perceived to be a nuisance. There will also be a new cast of potentially invasive, non-native species which will be better adapted to Wisconsin waters as they respond to changes in climate. Articulation of these and other challenges associated with the influence of climate change on APM in the strategic analysis will support their consideration in future decision-making. In the chapters describing the stakeholder interviews, the document makes it clear that other stakeholders were also concerned about the effects of climate change on APM.

Thank you very much,
Chelsey Blanke

McCord, Ashleigh I - DNR

From: Robert Boehm [redacted]
Sent: Friday, January 25, 2019 4:25 AM
To: DNR WQSS APMSA
Cc: [redacted]
Subject: Forest Lake Improvement Association comment regarding the APM in Wisconsin: Draft Strategic Analysis

Dear DNR,

Forest Lake is a 50-acre, landlocked Seepage Lake located in the heart of the Northern Kettle Moraine State Forest. Adjacent to the Mauthe Lake Recreation Area and the Ice Age Trail, Forest Lake is a popular destination for fishing, kayaking, canoeing, paddle-boarding, sailing/sail boarding and swimming. On any given day, visitors can outnumber riparian owners using the lake.

The Forest Lake Improvement Association (FLIA) has decades of experience partnering with the DNR in managing an infestation of Hybrid Eurasian Milfoil (HWM), an Aquatic Invasive Species (AIS). Left, unchecked, HWM covers half the lake and greatly diminishes the user experience and the desirability of Forest Lake as a destination. Swimming becomes a safety concern.

The Board of Directors of the FLIA, representing the near-unanimous sentiment of 60 property owners, submits the following comments regarding the WDNR Strategic Analysis of Aquatic Plant Management (APM) in Wisconsin:

Regarding 8.6 (Consistency in Evaluating Permit Applications)
The FLIA is concerned that the effect of this effort will be increased difficulty in obtaining herbicide treatment permits. Therefore, we support **Consistency Alternative 6 (Develop a Working Definition for the Social and Environmental Conditions that warrant APM).** We envision Consistency Alternative 6 as setting objective thresholds (i.e., percent of waterbody acreage affected, density of affected areas, etc.) which warrant APM, instead of establishing a bias for or against any particular AIS management method.

Regarding 8.7 (Grants)
Again, the FLIA is concerned that some of the alternatives eliminate or reduce funding for herbicide treatments. **Therefore, we support Grants Alternative 1 (Increase the amount of department grant funding available for supporting APM projects).** As stated in the opening sentence of 8.7, the Surface Waters Grants program is critical to stakeholders actively involved in conducting APM activities. APM activities greatly improve the recreational experience, and thus the use, of waterbodies. In addition to the funding methods mentioned in 8.7, user fees should also be considered (allocations from launch fees, park stickers, annual stickers for non-motorized watercraft, fishing licenses and voluntary contributions made during the process of fishing license purchases, etc.).

In Conclusion
If the FLIA were not granted permission to chemically treat Forest Lake, or if funding were not available, it would be a disaster to the thousands of people who love and use Forest Lake annually.
Weed Harvesting has been explored, and because of the lack of a suitable launch, high costs and limited availability of volunteers, weed harvesting is not a viable option on Forest Lake.

We also believe the concern of herbicide resistance in HWM is exaggerated: *chemical treatments do eliminate HWM*. The bigger problem is treatment permitting and funding processes lack the nimbleness and persistence that consistent control requires. Inevitably, spots of HWM infestation remain in deeper areas. HWM is incredibly prolific at reproducing, and areas once free of the invasive are re-colonized in a few years.

In terms of environmental impact, follow-up surveys on Forest Lake have shown that Native Plant Diversity increases after herbicide treatments. Doing nothing will allow HWM to significantly crowd out native species.

Water Sampling and measuring show that the concentration of herbicide falls very close to the irrigation standard within just 36 days after treatment.

From a social perspective, the HWM treatments serve as *the major incentive* to keep stakeholders involved, cooperating and contributing as a cohesive group to all aspects of Forest Lake's health. Many educational and action-oriented efforts have been implemented (or plans are underway), including:

- Updating the Lake Management Plan,
- "No Lawn Fertilizer" Pledge,
- Clean Boats-Clean Waters,
- Shoreline – Best Practices Education,
- Stocking to bolster game and pan fish populations,
- And, Septic System Maintenance/Education

If the DNR chooses to do nothing, the Public/Private partnership that was decades in the making will be seriously affected. The incentive for stakeholders to cooperate as a group in scientifically researched, professionally managed HWM treatments will be gone, and it is likely a multitude of uncontrolled individual efforts will result.

In our eyes, doing nothing about HWM is doing something much worse.

After decades of APM experience utilizing a variety of methods, the FLIA believes herbicide treatment must be preserved as an APM option. For Forest Lake, it is the most effective, economical and common-sense approach. With professional management, implementation and monitoring, it has been demonstrated to be safe for people, property and the environment.

Respectfully submitted,

The Board of Directors of the Forest Lake Improvement Association
John Bardenwerper, President
Robert Boehm, Vice President
Donna Bardenwerper, Secretary/Treasurer
Rosalind Rouse, Board Member
Steve Raabe, Board Member
Al Grzywacz, Past President/Weed Committee Chair

McCord, Ashleigh I - DNR

From: Nault, Michelle E - DNR
Sent: Friday, December 14, 2018 3:42 PM
To: DNR WQSS APMSA
Subject: FW: DNR Draft Aquatic Plant Management Strategy
Attachments: APM_Comments.pdf

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Michelle E. Nault
Lakes and Reservoir Ecologist
Bureau of Water Quality
Wisconsin Department of Natural Resources
Phone: (608) 513-4587
Michelle.Nault@wisconsin.gov


```
 ,__,
 (o,o)
 (  \)
 -"-"-
```

dnr.wi.gov

From: Schaal, Carroll - DNR
Sent: Friday, December 14, 2018 3:01 PM
To: McCord, Ashleigh I - DNR <ashleigh.mccord@wisconsin.gov>
Cc: Nault, Michelle E - DNR <Michelle.Nault@wisconsin.gov>; Mikulyuk, Alison F - DNR <Alison.Mikulyuk@wisconsin.gov>
Subject: FW: DNR Draft Aquatic Plant Management Strategy

I don't know if Dan submitted these through the APM address as well. Please take them as official comments on the SA.

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Carroll Schaal
Phone: (608)261-6423
Carroll.Schaal@Wisconsin.gov

From: Dan Butkus [redacted]
Sent: Friday, December 14, 2018 2:32 PM
To: Schaal, Carroll - DNR <Carroll.Schaal@wisconsin.gov>; Van Egeren, Scott J - DNR <Scott.VanEgeren@wisconsin.gov>
Cc: Michael Engleson [redacted]; Tjohansen [redacted]; Jerod Bennett [redacted]; Steve Richardson [redacted]; Bob Mott [redacted]; Tim Hoyman [redacted]
Subject: DNR Draft Aquatic Plant Management Strategy

Carroll and Scott,

Sending this to both of you since I see Scott was involved in drafting this as well, and he is our lakes biologist now.

It is impossible to separate my role as district commissioner and Wisc Lakes Director from my personal observations on this draft. But my opinions are my own and do not represent either organization, though my opinions are influenced by my other roles.

Overall, I thought the strategy was quite exhaustive. I really did not disagree with any of what was presented. I've attached a PDF summarizing my comments to specific sections. I only had two suggestions, one question, one "continuity check", and a handful of observations. The question is highlighted in yellow. I did note the page and chapter title in my comments so you can cross reference it. If I didn't comment on a section, then I had no issue or observation to make.

I now understand why the DNR talks continually about herbicidal treatment. 81% of the grant monies for EWM control go to herbicidal treatment. It is the elephant in the room. But again, I'll say that continually highlighting this technique obscures the message about other techniques available. And since you talk about a multi-pronged approach for APM's, the DNR might consider giving more space to describing these other techniques. So, yes, I once again got on that soapbox of "what about diver hand harvesting?". I know the answer. I'm just advocating that it at least be on equal footing with DASH. We may be one of the few or only lakes that take it to the level we have, but 10 yrs of data says it's effective, and costs about the same as herbicidal treatment.

You only need to respond to my single question. The rest is just my comments (or me being OCD, depending).

Despite the comments, I thought it was very well done.

Dan Butkus

12/14/18 Dan Butkus – Comments regarding DNR draft of APM Strategy

Page vii – Non-Chemical Approaches and Integrated Pest Management

I would like to see diver/snorkel hand-harvesting included alongside DASH as they are similar to DASH, but do not require a permit (non-mechanical)

Page viii – DNR Grants and Aquatic Plant Management

"The department's Recreational Boating Facilities (RBF) program also distributes cost-sharing grants for equipment used for cutting and removing aquatic plants in public water ways. Examples include mechanical harvesters, conveyors, transport barges, and harvester repair." Am I correct in thinking that the RBF program might cover the cost of a boat for a lake group, if that boat is used as a work platform/transport barge for EWM Control?

Page xiii – Hybrid Watermilfoil and Herbicide Resistance

End of last sentence of paragraph 1 – would suggest the addition of the phrase, "…or require the development of an APM approach for a particular waterbody that does not rely heavily/exclusively on herbicides."

Page 19 mid-page paragraph – 2.6 DNR Grants and Aquatic Plant Management

Observation: If $1.79 million is dedicated to EWM Control, and if $1.45 million of that is dedicated to herbicidal treatment, that represents 81% of EWM Control grant monies which is dedicated to herbicidal treatment of EWM. Therefore, $340,000, or 19% is dedicated to non-chemical APM's such as mechanical removal/control, DASH, diver/snorkel hand harvesting, drawdown/desiccation, etc. While this might be difficult to obtain, I'd like to see a pie chart someday that breaks down annual grant dollars for the various APM techniques for ALL invasive plants and EWM specifically.

Page 23, bottom of page – 4.1 Costs bullet point Lake Districts

Observation: A quick review of the 2018 grant and budget for Squash Lake Protection and Rehabilitation District supports this claim. 18% of the tax revenue collected was spent directly on APM qualifying expenses with assistance from the DNR through grants. If we include related non-qualifying APM expenses, this figure is about 23% spent on APM and related activities. However, without DNR grant support, approximately 80% of our tax levy would be dedicated to APM. This is because DNR grant reimbursements "recycle" operating revenue, and the same dollars can effectively be spent over and over again with minimal infusion of new tax revenue dollars annually to make up any "out of pocket" loss due to local share requirements.

12/14/18 Dan Butkus – Comments regarding DNR draft of APM Strategy

Page 27 bottom of page – 4.2 Benefits

Observation: Nor do these studies look at the difference between lakes with controlled EWM vs uncontrolled EWM.

Page 30 paragraph 2 - 5. Aquatic Plant Management Stakeholders and Collaborators

Continuity check: The strategy cites approx 230 lake districts in the state on page 30. On Page 23, you cited there being just over 240. For lake associations, page 23 says 550, page 30 says 710.

Page 44 third paragraph under – 7.3 Strategies for Managing Non-Native Aquatic Plants

Observation: "…wait-and-see…" as well as what was pointed out on page 39 as a concern by stakeholders regarding "…wait-and-monitor…" is a genuine concern and should not be under estimated. It is far more difficult to bring any invasive species like EWM under control once it has been allowed to "get out of control". With increased difficulty comes increased cost. Most lake organization do not want to take a wait-and-see approach for this very reason. Why take the chance when you can at least "monitor and control". The accompanying graphs on page 45 quantify the difference between "monitor and control" vs "wait and see". There is a suppressed presence and the scatter of data is clear evidence to support "monitor and control".

Overall Chapter 8

Observations: The various Alternatives listed for the various categories are generally good. Grant restructuring is problematic. There is a need to do more with what you have, or do more with less than what you have now. Something must be sacrificed to extend benefits to others. This will not be a popular move, but may be necessary. Looking at the probability of receiving grants for our own lake after having received them for 8 consecutive years was the driving force behind creating a lake district. There are no guarantees that we'd continue to receive funding. And without funding, the strides we made in EWM control would be lost. There just wasn't enough funding available through volunteer donations to carry the program without subsidies from the state. Yet continuing the APM program was critical to our lake. A district with taxing authority can cover the cost, should grant funding be lost. We suspect that this revelation will spawn other lakes to form districts for the same reason. Since districts cast a wider net on revenue generation, the per-household cost is lower than if a handful of dedicated association members funded the efforts. I think in this sense, it may be that a tiered Surface Water Grant system may work: Associations at 75/25, districts at 67/33, municipalities at 50/50? Food for thought.

12/14/18 Dan Butkus – Comments regarding DNR draft of APM Strategy

Overall Chapter S3

Observations: Overall quite exhaustive of techniques in the toolbox. Page 161 in talking about DASH and hand removal…as seen in our lake, hand removal is not exclusively relegated to shallow water. The clarity of our lake means that we hire SCUBA divers, and they can and do go to depths of 15-20 to remove EWM root and all.

McCord, Ashleigh I - DNR

From: [redacted]
Sent: Monday, January 21, 2019 4:57 PM
To: DNR WQSS APMSA
Subject: Comment - Aquatic Plant Management Report

Dear Sir or Madam:

The most important aquatic plant management practice is prevention; preventing the introduction of new aquatic invasive species in the state and the spread of invasive species to waterbodies that are not infested. Early detection and response and the management of existing infestations are important, but the prevention of new introductions must be the highest priority. As stated in the report, once an invasive species is introduced, it is very difficult to eliminate it from a waterbody (or a terrestrial landscape). Given this basic truth, it is interesting that prevention is not mentioned in the report when it should be the top priority.

As someone who has been involved in invasive species management from both a policy and practice perspective, it is unfortunate that we never seem to learn the lessen that invasive species (aquatic and terrestrial) are very damaging to native ecosystems, waterscape and landscape aesthetics, recreation, and property values and that preventing the introduction and spread of invasive species must be taken seriously and be the top priority. In this regard, preventing the introduction and spread of invasive species, Wisconsin has failed miserably and shows no inclination to rectify the situation. Sadly, the same is also true for most other states. In fact, if the DNR is not going to take the steps needed to prevent the introduction and spread of invasive species, it becomes increasingly difficult to support other management activities because more and more ecosystems will become infested and experience tells us these infestations will likely never be eliminated.

From an aquatic invasive species perspective, I will use a lake in Chippewa County, a lake where my family has had a cottage for nearly 100 years, and a lake that has somehow avoided becoming infested with any invasive species thus far, as an example. The odds are not in favor of this lake remaining invasive-species-free as no preventive measures are in place, other than signage at the public boat landing (which is not a solution), and the influx of boats that have not been inspected (the primary vector of zebra mussels and other aquatic invasive species) continues to increase dramatically. The reality is that if the DNR does not act to fix this problem, this lake will ultimately become infested with aquatic invasive species and ruined forever. And if the DNR is not willing to take the steps necessary to prevent potentially-infested watercraft from being launched on this lake, and the many other waterbodies across the state that are facing the same threat, or cannot take the steps necessary due to a lack of funding, then the boat landing, and all public boat landings, should be closed immediately and until this irresponsible situation can be rectified. That will certainly get people's attention. And while I understand the political difficulties, they are not a viable excuse given the consequences of inaction.

This specific example, and myriad others across the state, raises the question of who should be held responsible? While the general public certainly bears considerable responsibility, given that the DNR is the public agency that is ultimately responsible for protecting public waters, it is clearly the DNR that must be held accountable for the failure to prevent the introduction and spread of invasive species and the damage that results from this failure. Once again, I recognize the difficulties the DNR faces, the cost of not getting serious about the invasive species threat will be much greater than the cost of not facing the problem. Perhaps the only answer is for the DNR to be sued for violating the public's trust when it comes to invasive species prevention and management. This would be unfortunate, but may be the only way to get people's attention and to get the

DNR to take the rowing invasive species problem and its responsibility seriously. The alternative, the unmitigated spread of invasive species, is unthinkable, but will be the final outcome.

I'm sorry to be so pessimistic, but frustration is quickly becoming the norm for me and for many others.

Jim Calkins

McCord, Ashleigh I - DNR

From: Tim Day [redacted]
Sent: Tuesday, January 22, 2019 10:22 AM
To: DNR WQSS APMSA
Subject: APM Strategic Analysis report comments
Attachments: APM.pdf

Attached are my comments regarding the Aquatic Plant Management Strategic Analysis report. Thank you for your efforts!

Tim Day
Vice President, Board of Directors
Shawano Area Waterways Management

Tim Day **Commercial Horizons, Inc.**

[redacted]

January 21, 2019

Mr. Carroll Schaal
Lakes and Rivers Section Chief
101 S. Webster Street
Madison, WI 53707-7921

Dear Mr. Schaal,

Thank you for the opportunity to provide comments on the Aquatic Plant Management Strategic Analysis document. It is clear that the WDNR and the APM Study Group have put much effort into developing this very thorough review of the administrative code that impacts APM through herbicide control and mechanical/manual removal. Your efforts are greatly appreciated.

My comments below are from an admittedly narrow perspective. They are based solely on my experiences on Shawano Lake in dealing with the issue of APM and aquatic invasive plant species. Like most Wisconsin lakes, Shawano Lake has unique characteristics that present unique challenges, not the least of which is the size of the lake (over 6,000 acres) and the existence of a substantial population of AIS. My comments are focused primarily on chapter 8 of the document because this chapter deals with the issue of Management Alternatives and is the area that most directly impacts our APM efforts on Shawano Lake. It is from this perspective that my comments are offered.

Chapter 8.1 Collaboration

Alternative 6. Requiring consultants who define treatment areas and choose products and application rates to have DATCP pesticide applicator certification or other training seems to be a 'one size fits all' solution to a problem that doesn't exist with competent, educated consultants who are well-versed in the science of product and application rates. I can appreciate that there are consultants with little experience in this area that may be specifying treatment parameters without the knowledge desired; however, this would be an unnecessary cost and time burden for competent consultants who would have no choice but to pass the cost along without any benefit to their customers. I would ask that more thought be put into finding an alternative solution that targets those consultants that clearly lack knowledge in this area while exempting consultants that have demonstrated their knowledge and expertise.

Chapter 8.5 Integrating New Information

Alternative 5.

Requiring the monitoring of aquatic plant communities on all waterbodies where APM is conducted would impose a prohibitive cost burden on large lakes such as Shawano Lake. The cost to have a point-intercept or biomass plant survey performed annually on Shawano Lake is in excess of $20,000. I can appreciate the desire to have this information available, however consideration should be given to the type and scope of APM conducted, particularly on large bodies of water, before requiring monitoring. On Shawano Lake we have elected to continue annual monitoring of the aquatic plant community in order to track the results of a large-scale 2016 APM event and to identify trends, but the financial cost is significant, and our lake association may not necessarily have the resources to continue this long term. Requiring monitoring and the related costs would likely put us in a position to forgo other lake activities that could have a substantial, positive impact on the lake in order to meet monitoring requirements.

Alternative 6.

How herbicide concentration monitoring is defined would have a substantial impact on the cost and effort related to monitoring. We have done aquatic herbicide treatments in recent years where volunteers monitored the herbicide concentration in order to help analyze the effectiveness of the treatments. Monitoring was done immediately following the treatments and continued for several days. The cost was minimal because volunteers were utilized. Imposing additional requirements would necessarily increase the cost of the treatments without necessarily improving the data collected.

I would also suggest that small herbicide treatments be excluded from any type of monitoring requirement. Our lake association annually oversees herbicide treatments on less than 100 acres in order to improve navigation lanes in seven specific areas of Shawano Lake. It is unclear how concentration monitoring of these treatments in a 6,000+ acre lake would be of value. On a lake the size of Shawano Lake, with water flowing in and out of the lake through a channel from the Wolf River, as well as the impact wind speed and direction can have, any monitoring results from a small treatment would likely be unique to the conditions present on that day and of little value for the evaluation of the effectiveness of this or any future treatments.

Chapter 8.6 Consistency in Evaluating Permit Applications

Alternative 6.

While the goal of improving consistency in the APM actions permitted statewide by setting a threshold or definition of conditions that must be met is understandable, it is difficult to conceive how such definitions could fairly and adequately address every situation that is unique to each lake, community, and water use. What works on a small lake in northern Wisconsin may not work on Lake Winnebago. Part of what makes our Wisconsin lakes so special is their diversity and how each community utilizes this special resource. Defining conditions and thresholds would likely limit the flexibility required to address the specific APM needs of each waterway.

Chapter 8.7 Grants

Alternative 2.

Dividing a single pool of grant funds into several additional categories (pools) may have some appeal on the surface but as a practical matter it is difficult to envision a situation where the demand for any given category matches the supply of funds allocated to that category. It may be desirable to have different ranking criteria for different types of APM projects but there still needs to be an overall ranking of all APM projects for grant awards from a single pool of grant funds. The reason is that APM projects could vary significantly from year to year resulting in some grant funds having a high demand in a given year while other grant funds are unused simply because there were no grants requests for that type of APM project.

Alternative 4.

The specific example used for funding a wider variety of APM techniques is mechanical harvesting. There currently are grants available from the WDNR for the purchase of mechanical harvesting equipment. Any changes in the variety of APM techniques funded needs to be coordinated with other existing funding sources.

Alternative 5.
Providing greater flexibility in the amount of time to fund APM projects, once granted, makes sense. Some APM projects are dependent on conditions over which the grantee has no control (water temperature, wind speed, etc.). A much better outcome would be achieved if the grantee could wait for the preferred conditions for their APM project rather than conduct it under less than ideal conditions in order to meet an arbitrary deadline.

Alternative 6.
Assuming APM ranking criteria are effective, how does it make sense to limit funding to a sponsor even though their APM project ranks higher than the project of another sponsor simply because they have previously received funding? The amount of previous funding received has no bearing on the necessity and qualification of a future APM project. I don't know if such a provision would help or hurt our efforts on Shawano Lake but, regardless, I am strongly against the imposition of a limit on funding based on criteria that has no basis in the science and facts supporting the APM project.

Alternative 7.
Reducing or eliminating department grant funding for herbicide treatments of aquatic invasive plant populations that have become well-established in a given waterbody seems to ignore the long-term negative impact this would have. Furthermore, there already exist limits on how often grants can be received for these types of treatments.

Using Shawano Lake as an example, our large-scale treatment for EWM in 2016 resulted in a major reduction in the quantity and density of EWM. This has had a big impact on the fishery and recreational activities on Shawano Lake, producing a significant, positive economic impact on the Shawano area community. If we are unable to receive grant funding in the future to continue our activities to control EWM our efforts will have been for naught. Our lake association's contribution to the 2016 treatment was approximately $250,000, a significant amount for a non-profit organization that relies on voluntary $50 annual dues from its members, fundraising, and support from local communities to fund its activities. I believe this demonstrates the commitment of our lake community in leading the fight to maintain a healthy Shawano Lake and believe the state should support our efforts, not penalize our past efforts by reducing or eliminating funding. Shawano Lake is considered a super-spreader lake so any success we have in controlling AIS will reduce the likelihood of spreading AIS to other Wisconsin lakes.

Alternative 9.
It is impossible to support an alternative funding source for APM and AIS management without knowing what that source might be. As stated in the document, protecting aquatic plant communities and preserving waterbody access is required by state law. Wisconsin waterbody users and residents are primarily Wisconsin taxpayers so it only makes sense to utilize state resources to maintain these valuable assets.

Alternative 10.
Taking a watershed-level approach in APM projects should be encouraged, but not required. While collaboration is desirable, these projects should not be given a higher priority. Applicants can reach out to regional and local partners in the watershed but they cannot force them to collaborate, so they shouldn't be penalized because of unreasonable or unwilling parties.

Chapter 8.8 Watershed health, AIS Prevention, Enforcement, Overall Emphasis, and Other Topics

Alternative 1.

Any efforts to heighten an emphasis on runoff issues and ecological stewardship in the department's APM program are strongly supported. Lake property owners can do everything in their control to limit runoff with native shoreline plantings, rain gardens, etc., but these efforts pale against the impact of runoff generated by nearby farms and other entities. I believe you would find a willing participant in lake organizations to reduce nutrient loading from these sources.

Alternative 3.

Any efforts to increase the enforcement of the movement of aquatic invasive plants between waterbodies is commendable and are encouraged. However, I believe a more effective approach is education. Most people that use the waterways want to preserve and protect them and are willing to take steps to do that. In spite of the education that has taken place there is still a large percentage of people who are unaware of the impact of transporting plants, bait, and water from one body of water to another. Clean Boats Clean Waters is an effective program but supplementing it with other approaches to educate the public would be helpful. I believe you will achieve more success through education than enforcement, though both should be used where appropriate.

Other Comments

My only other comment has to do with the posting of notices when herbicide treatments are done. For the most part they are valuable and practical. However, when a large-scale treatment is done the requirement to post a sign every 50 feet is neither effective nor practical. Shawano Lake has over 20 miles of shoreline. When we did our large-scale treatment in 2016 we had to assemble an army of volunteers to post signs every 50 feet along the shoreline. Further complicating the posting is that it had to be done within a short period of time (I believe it was a couple of days) of when the treatment was taking place. We didn't know the exact day because it depended heavily on weather conditions. As you can imagine there was a lot of effort that went into the timely coordination of something that could be argued was of limited value because all of the lakefront property owners had been communicated to about the treatment in some form or fashion previously. I understand a change in law would be required but it in my opinion public notice requirements should vary depending on the situation. A newspaper notice and perhaps some other social media means of reaching a large portion of the people impacted should suffice when large scale treatments are performed because the physical posting of notices on this scale are ineffective and not practical.

Thank you for your consideration of these comments.

Regards,

Tim Day

Tim Day

Vice-president
Board of Directors
Shawano Area Waterways Management

McCord, Ashleigh I - DNR

From: Drake, Deanne C - DNR
Sent: Wednesday, January 16, 2019 9:25 AM
To: DNR WQSS APMSA
Subject: comments - strategic analysis of aquatic plant management

I spent a day reading this document. In my opinion, the strategic analysis is well-written and comprehensive - I found it very informative.

Just a few specific comments/opinions:

**I am happy to see the emphasis on nutrient management. The public seems to take this on board to some extent when it is well-explained.

Dept resources workload Alternatives 9 and 10 (P 66 -) seem like excellent ideas aimed at increasing efficiency. The online template could include a calculator for application rates and suggestions for application.

One remaining question in this section, and maybe I missed it, but is purchase of herbicides is in any way restricted or monitored?
Outreach and Communications Alternative 1 (P 70) sounds undesirable to me - like a lot of ongoing work for something that will end up as junk email. I think information on control should be clearly available on the website/ described under Dept Resources Workload Alternatives 9 (online template).

Outreach and Commuinication Alternative 2 sounds good to me. It gives us some potential face time with the public, and since there is already a meeting going it doesn't add a whole new task.

Information/Integration Alternative 5 sounds impossibly expensive for many projects. Maybe add just one more monitoring at 1 or 2 years?

Information/Integration Alternative 8 seems critical to me - monitoring of a number of unmanaged lakes to understand baselines and changes not associated with invasives.

Grants: are we allowed to tax herbicides?

Barley straw is a surprise - very interesting.

Feel free to contact me if you wish to.

Sincerely,

Deanne Drake

Wisconsin Department of Natural Resources

Office of Great Waters - Mississippi River, Lake Superior and Lake Michigan
Aquatic Vegetation Specialist
UMRR-LTRM
Upper Midwest Environmental Science Center
2630 Fanta Reed Rd
La Crosse, WI 54603

Phone (608) 781-6363
Deanne. Drake@wisconsin.gov

McCord, Ashleigh I - DNR

From: Thomas Duffey [redacted]
Sent: Tuesday, January 15, 2019 1:16 PM
To: DNR WQSS APMSA
Subject: Comments on Draft Strategic Report regarding aquatic plant control

Carrol,

Thanks for sending this draft my way. While my reading of same has only been cursory to this point, I've already identified a few points I'd like to share. They are:

- First, this appears to be a great workup of where things are at. Here at the City of Appleton Stormwater utility, we are interested in doing *as little AIS treatment as possible*. We suspect significant damage to our emergent plant communities is occurring with these treatments, and the herbicide section of this report does tend to support what I think we've been seeing. We're just stormwater ponds, but we have some with EWM and CLP. I tend to think we're spinning our wheels with these treatments, for little actual gain.

A couple negative points:

- All benefits of AIS treatments listed in this report-unless I missed something-were only economic. It's as if you guys have already admitted there are no *resource-based* reasons to be doing any of this stuff.

- The mention of controls used on woody species would have one believe there is no such thing in Wisconsin as a shrub-carre, only "brush" which needs to die. So we should view stands of alders, Cornus, willows, as all being "AIS"? I hardly see it that way and for what it's worth, *have* been able to sense a bias on the part of disparate DNR staff against woody plants. Odd, given that far and away, Wisconsin was historically covered by primarily woody plant communities. I know the prairie people would tell a different story, but evidently, they don't have the *Original Vegetation Cover of Wisconsin* map on their office walls like I do!

Thanks for reading!

Thomas Duffey-Horticulturist
City of Appleton Engineering Dept.
[redacted]

McCord, Ashleigh I - DNR

From: RK Ellis [redacted]
Sent: Friday, January 25, 2019 2:21 PM
To: DNR WQSS APMSA
Subject: WDNR Aquatic Plant Management Strategic Analysis

This is to comment on proposed changes to APM, sections 8.6 and 8.7.
The District supports section 8.6, Alternatives 1-3.
It does NOT support Alternatives 4-7.

In section 8.7, the District supports Alternatives 1-4.
However, the District STRONGLY OPPOSES Alternatives 5 - 11.

Bob Ellis, Chairman
Waupaca Chain O'Lakes District

McCord, Ashleigh I - DNR

From: James Gehrke [redacted]
Sent: Monday, January 21, 2019 10:16 AM
To: DNR WQSS APMSA
Cc: Terry Goldbach; Barb Gajewski; [redacted]; Cindy Hermel
Subject: DNR Strategic Analysis report
Attachments: DNR EWM Management Meeting copy.pdf; ATT00001.htm

I am submitting thoughts about the Wisconsin Department of Natural Resources' response to EWM as I see it through the eyes of a life-long conservationist and a 21 year board member of a lake association in Oneida County. Crescent Lake Association had a good working relationship with the DNR for many years between 1970 and 2015. However, since EWM was discovered in Crescent Lake in July of 2015 our relationship has been less than satisfactory.

I am happy to gave this opportunity to supply input to what <u>might</u> be a new okay fir actual that might result in new hope for lake associations such as ours.
It has taken years of struggling, months of organizing, and weeks of meetings for us to develop and office in controlling EWM. It has taken frequent adaptations and revisions of what we really want to do in order to meet difficult to understand limitations placed on us by the DNR.

Please look at the attached document that was created by our Aquatic Invasive Species Response Team. It was presented to Scott van Egeren and James Yach of the DNR on Dec. 4,2018. As you will see, it describes EWM that has grown from a couple of plants in 2015, to an almost continuous ring of vegetation surrounding a beautiful 622 acre lake in both central Wisconsin.
Meanwhile, a very dedicated, aggressive group of about 105 volunteers (and tax payers) is becoming discouraged and resentful. The "you don't have enough EWM yet" philosophy is not at all rational.

It is not good science, and it is not good economics.

JAMES M. GEHRKE
[redacted]
RHINELANDER, WI 54501

[redacted]

EURASIAN WATER MILFOIL (EWM) MANAGEMENT MEETING

DNR AND CRESCENT LAKE ASSOCIATION

December 4, 2018

EURASIAN WATER MILFOIL HISTORY ON CRESCENT LAKE

LOCATION: ONEIDA COUNTY SIZE: 622 ACRES

1970 Crescent Lake Association was formed

2004 - 2018

Started to do boat landing boat inspections checking for invasive species. This past year and many formers years we led the county in hours. 2018 we did 30% of the volunteer hours done in Oneida County.

Also, did lake monitoring by volunteers twice annually by tossing rakes every 100 feet and identifying every plant brought to the surface. Have maintained the results and educated lake residents. About one thousand hours of time spent doing this.

Applied for and received Clean Boats Clear Waters DNR Grant. 2004 – present. 4598 hours of boat inspection time 2004 - 20014

2007

Crescent Lake Management Plan completed

2008

Crescent Lake Management Plan revised

2009

Crescent Lake Management Plan revised

2015

July: EWM discovered by UW Stevens Point near boat landing. Crescent Lake Association (CLA) contacts Rhinelander DNR staff for guidance and proposes a course of action. CLA proposes to cover EWM site with a benthic barrier (fabric, impervious barrier, placed on the bottom of the lake covering the EWM). Rhinelander DNR staff does not approve this course of action. CLA states it is concerned that EWM will expand throughout the lake if immediate action not taken.

Hand pulling/harvesting began with the assistance of Oneida County Land and Water Conservation Office.

539 volunteer hours of boat inspections in 2015

CLA applied for and received $20,000 Early Detection and Response Grant (AUG 1, 2015) to (JUNE 30, 2018) to assist with managing spread of EWM. Hired consulting firm to survey Crescent Lake and assist with developing plan of action.

$2,293.00 to Onterra for consulting services. (see map 1)

2016 Year two of Early Detection and Response Grant

Visible expansion of EWM.

Early and late season lake survey completed by outside contractor. (see map 2)

Increase volunteer hand pulling/harvesting activities.

Lake resident volunteer hand harvesting of EWM totaled 37 hours, pounds total harvested for year not available.

Contracted with outside contractor to assist with hand harvesting of EWM. Used grant funding to cover cost. Total hand harvesting and DASH harvesting of EWM by outside contractor 8.5 cubic feet, 24.13 hours on the water.

360+ volunteer hours of shore monitoring looking for EWM.

675 volunteer hours of boat inspections in 2016.

Discussed herbicide application at Crescent Lake Association meeting. DR. Larry Benning and John Sirek, experts in EWM herbicide treatment, presented at an association meeting. Received overwhelming support by members in attendance.

Submitted DNR application and permit to do herbicide treatment of EWM. ($195.00) Permit denied.

Met with Rhinelander DNR staff to discuss use of herbicides to manage/control spread of EWM. Told by DNR staff an application for herbicide application would not be approved.

$5,080.00 to Onterra and Aquatic Plant Management

2017

Visible rapid expansion of EWM. (See map 3)

Increase hand harvesting activities.

Lake resident volunteer hand harvesting of EWM totaled 64 hours, pounds total harvested for year not available.

Contracted with outside contractor to assist with hand harvesting of EWM. Used grant funding to cover cost of

Applied for application to use Diver Assisted Suction Harvesting boat (DASH boat) for more efficient harvesting of EWM. $300.00 Permit approved.

Contracted with outside contractor to assist with hand harvesting and DASH boat harvesting of EWM. Used grant funding to cover cost. Total hand harvesting and DASH harvesting of EWM by outside contractor 19 cubic feet, 49 hours on the water.$3,892.25

Met with Rhinelander DNR staff to discuss use of herbicides to manage/control spread of EWM. Told by DNR staff an application for herbicide application would not be approved.

Discussed with Madison based DNR staff the use of herbicides to manage/control spread of EWM. Got verbal approval herbicide application for the fall of 2017. CLA decided not to go forward with herbicide application because the EWM growing cycle was over and desired control impact would not be realized.

417 volunteer hours of shore monitoring looking for EWM.

640 volunteer hours of boat inspections in 2017

Were told that we had to submit another LAKE MANAGEMENT grant in order to qualify for additional AIS GRANT……

Applied for and received $37,000 Lake Management Grant to assist with managing spread of EWM.

Applied for and received a second $20,000.00 Early Detection and Response Grant to assist with managing spread of EWM.

2018

SIGNIFICANT RAPID EXPANSION OF EWM. (see map 4)

Increase hand harvesting activities.

Lake resident volunteer hand harvesting of EWM totaled 451 hours with 3095 pounds of EWM harvested.

Applied for application ($300.00) to use Diver Assisted Suction Harvesting boat (DASH boat) for more efficient harvesting of EWM. THE CONTRACTOR COULD NOT DO DASH BOAT HARVESTING.UNTIL LATE SUMMER BECAUSE OF THE DNR FAILURE TO APPROVE THE APPLICATION IN A TIMELY MANNER.

Contracted with outside contractor to assist with hand harvesting and DASH boat harvesting of EWM. $6,099.20 Used grant funding to cover cost. Total hand harvesting and DASH harvesting of EWM by outside contractor 81.0 cubic feet, 21 hours on the water.

Met with Rhinelander DNR staff to discuss use of herbicides to manage/control spread of EWM. Told by DNR staff an application for herbicide application for Crescent Lake would not be approved. DNR did approve herbicide treatment in lakes in Northern Wisconsin.

Lake residents build Diver Assisted Suction Harvesting Boat. Used grant funds AND ASSOCIATION FUNDS to cover expenses. $8,978.11 DASH boat completed in Sept.

305 volunteer hours of shore monitoring looking for EWM.

569 volunteer hours of boat inspection time in 2018

Many Waters has indicated that our bill for 2018 to address EWM only will come to $5800.00

This brings the amount of funds in 2018 expended for EWM alone to **$21,177.31**

TOTAL COST IN GRANT AND ASSOCIATION FUNDS SINCE JULY 13, 2015

$32,937.56

Lake residents are becoming more and more frustrated with DNR's lack of concern regarding the spread of EWM in Crescent Lake. We do all the work and the DNR provides roadblocks to effective EWM management. (see map 4)

DNR staff contacted do not provide any creative means of addressing EWM issue on Crescent Lake.

2019 ????

WHAT IS THE DNR'S PLAN TO ADDRESS EURASIAN WATER MILFOIL IN CRESCENT LAKE?

EWM Harvesting Activities

2016

- **Volunteer, 37 hours na pounds**
- **360 volunteer hours shore monitoring looking for EWM**
- **Commercial, 24 hours**
- **Commercial, 8.5 cu ft EWM**
- **Commercial, .35 cu ft per hour**

2017

- **Volunteer, 64 hours na pounds**
- **417 volunteer hours shore monitoring looking for EWM**
- **Commercial 49 hours**
- **Commercial, 19 cu ft EWM**
- **Commercial, .39 cu ft per hour**

2018

- **451 hours, volunteer 3095 pounds**

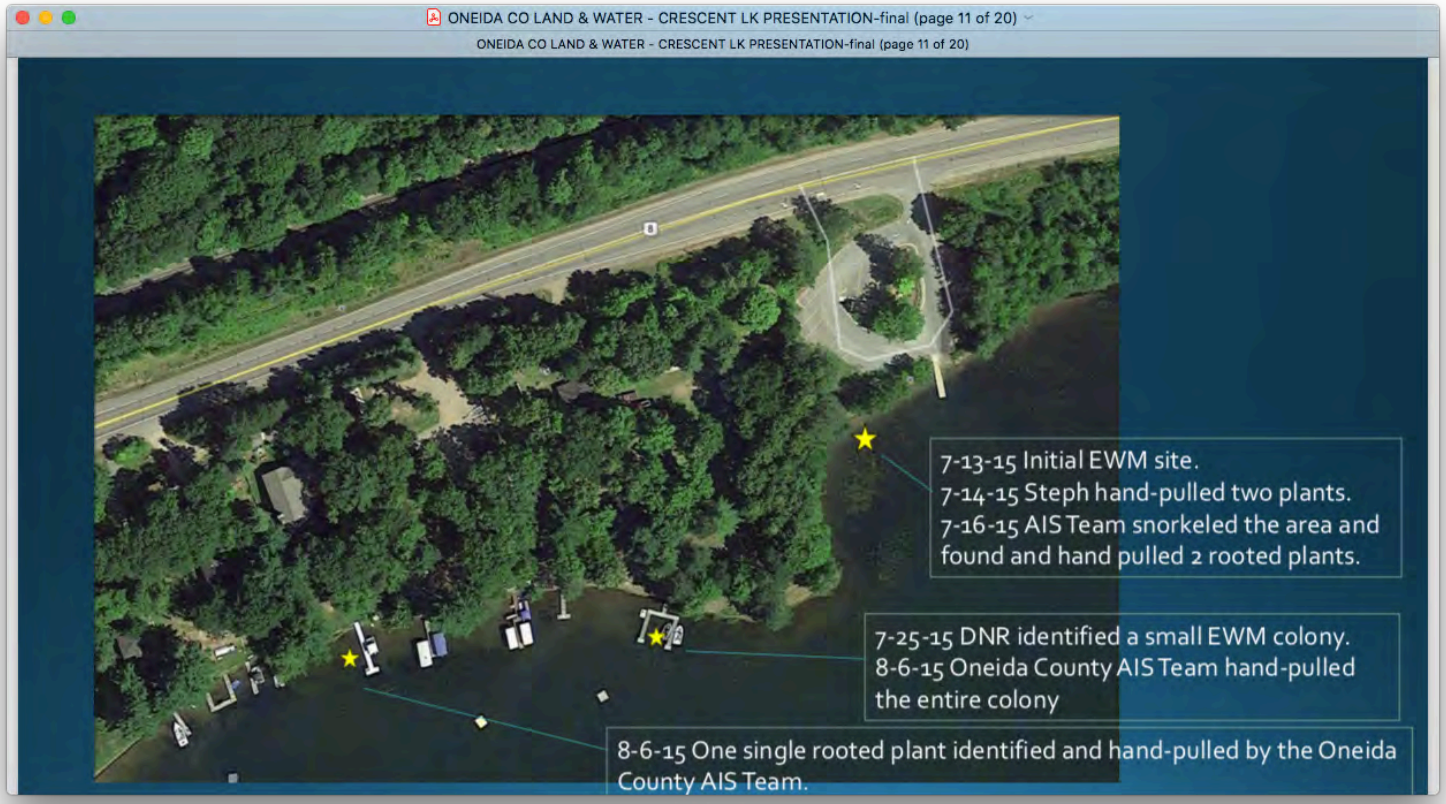
- **305 volunteer hours shore monitoring looking for EWM**
- **Commercial 21 hours**
- **Commercial, 81 cu ft EWM**
- **Commercial, 3.86 cu ft per hou**

COMMERCIAL HARVEST 2016 THROUGH 2018

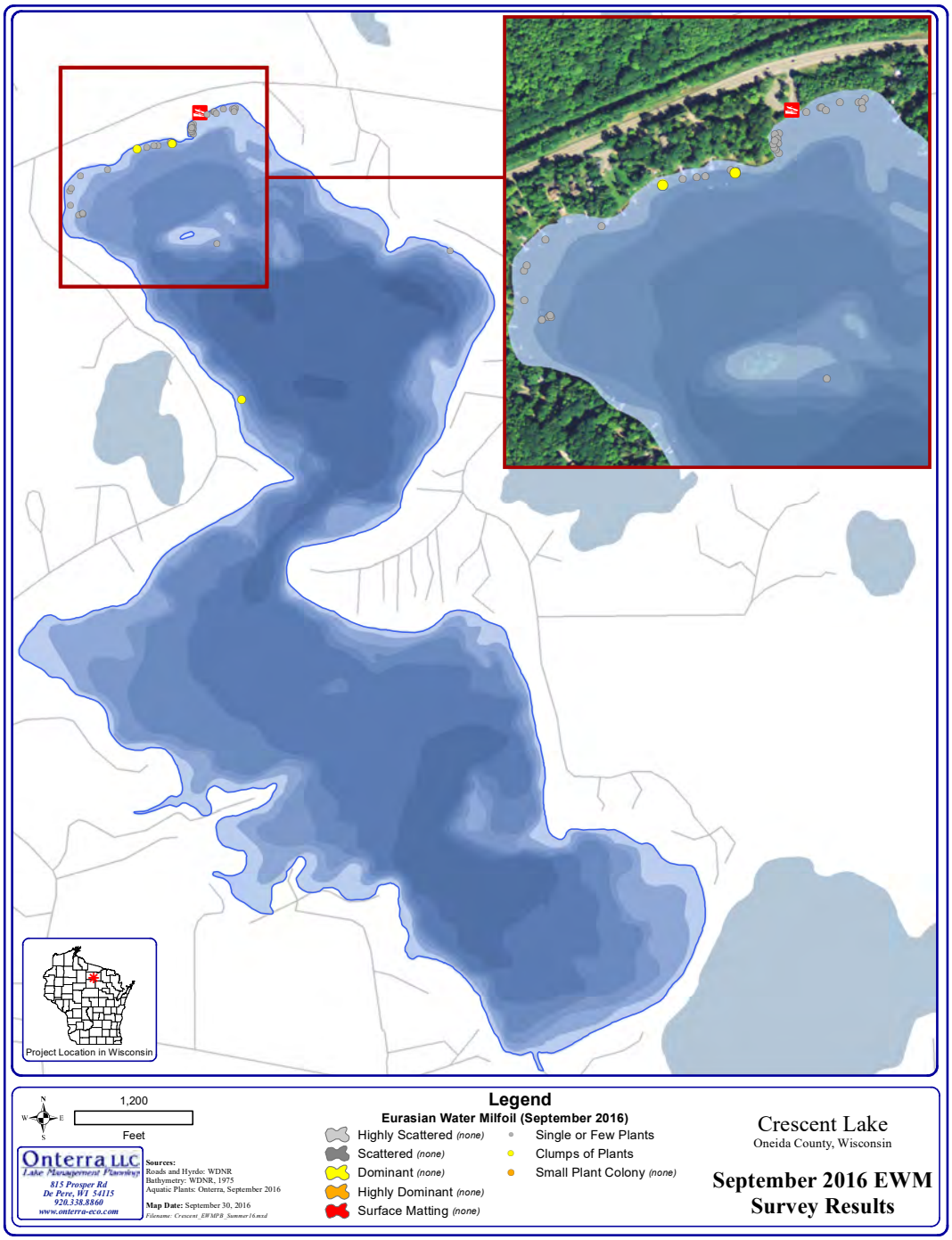
- **3.51 CUBIC FOOT PER HOUR HARVEST INCREASE.**
- **11-FOLD INCREASE IN 3 YEARS.**
- **OVER 1000% INCREASE IN EWM IN 3 YEARS!!**

We do not regret doing the job of education for lake residents and all lake users. We will continue to do CB/CW activities and work with the DNR and OCL&W office. We are eager for the results of the Lake Management Grant that we have been given. We want to move beyond the tasks of AIS and embrace shore improvement, littoral zone protection, and the fish and wildlife enhancement, and watershed preservation missions; but we can't do these things while watching the lake change from a full recreation lake to a choked mass of weed material that prevents use by anglers, and family recreation enthusiasts.

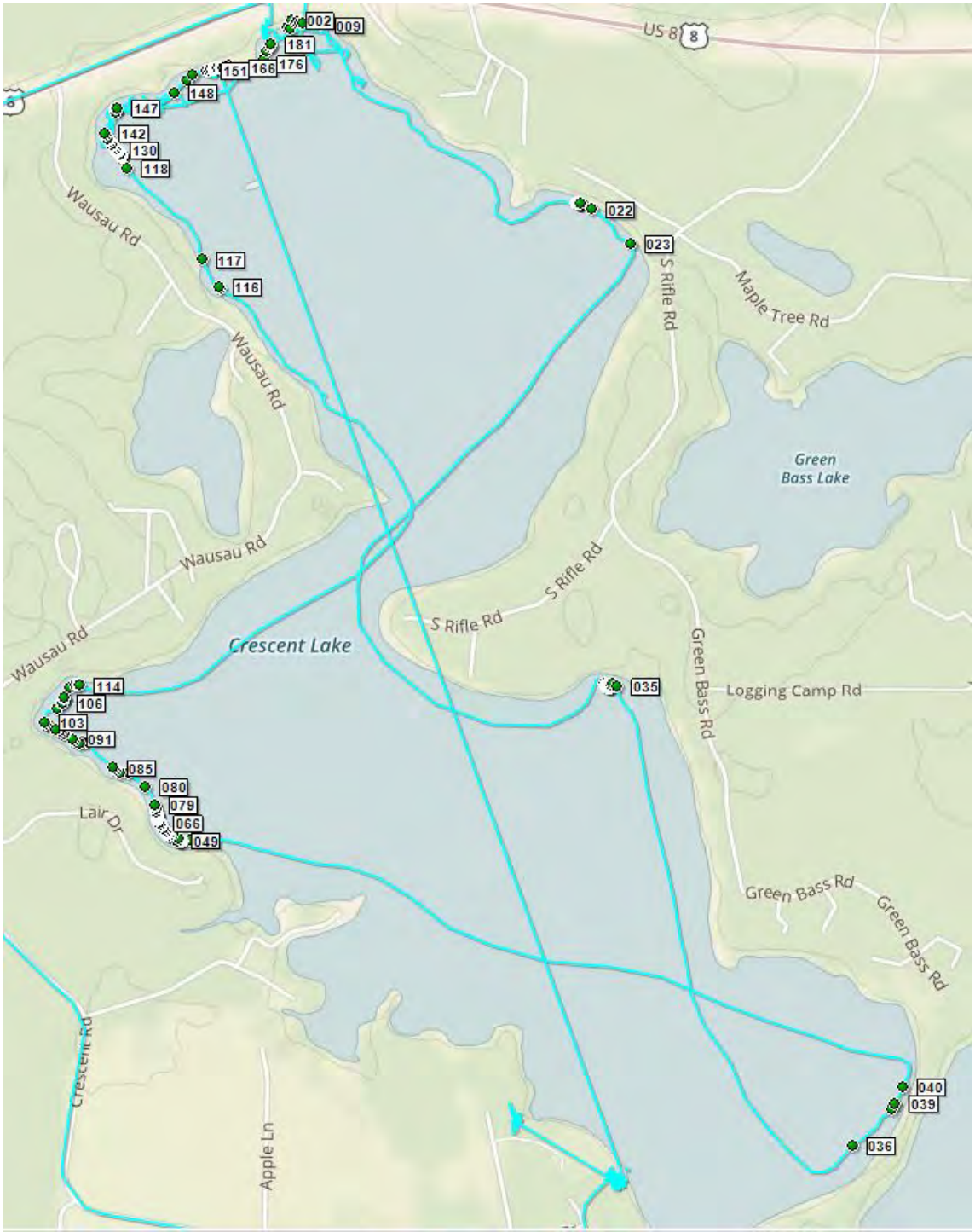
Map 1


ONEIDA CO LAND & WATER - CRESCENT LK PRESENTATION-final (page 11 of 20)
ONEIDA CO LAND & WATER - CRESCENT LK PRESENTATION-final (page 11 of 20)
7-13-15 Initial EWM site.
7-14-15 Steph hand-pulled two plants.
7-16-15 AIS Team snorkeled the area and found and hand pulled 2 rooted plants.
7-25-15 DNR identified a small EWM colony.
8-6-15 Oneida County AIS Team hand-pulled the entire colony
8-6-15 One single rooted plant identified and hand-pulled by the Oneida County AIS Team.

Map 2


Project Location in Wisconsin
1,200
Feet
Legend
Eurasian Water Milfoil (September 2016)
Highly Scattered (none)
Scattered (none)
Dominant (none)
Highly Dominant (none)
Surface Matting (none)
Single or Few Plants
Clumps of Plants
Small Plant Colony (none)
Onterra LLC
Lake Management Planning
815 Prosper Rd
De Pere, WI 54115
920.338.8860
www.onterra-eco.com
Sources:
Roads and Hyrdo: WDNR
Bathymetry: WDNR, 1975
Aquatic Plants: Onterra, September 2016
Map Date: September 30, 2016
Filename: Crescent_EWMPB_Summer16.mxd
Crescent Lake
Oneida County, Wisconsin
September 2016 EWM
Survey Results

Map 3


002
009
181
151
166
176
148
147
142
130
118
US 8
8
Wausau Rd
117
116
022
023
S Rifle Rd
Maple Tree Rd
Green Bass Lake
Wausau Rd
S Rifle Rd
S Rifle Rd
Crescent Lake
Wausau Rd
114
106
103
091
035
Green Bass Rd
Logging Camp Rd
085
080
079
066
049
Lair Dr
Green Bass Rd
Green Bass Rd
Crescent Rd
Apple Ln
040
039
036

Map 4

Lake: Crescent Lake, Oneida County, MI
Map Date & Creator: 11.2.2018, Many Waters, LLC
Source: WDNR hydro, EWM-Many Waters
File: Crescent_MLSS_2018

Crescent Lake - Oneida Co, WI
Mid/Late Season EWM Survey
2018

McCord, Ashleigh I - DNR

From: Tom Hinchliffe [redacted]
Sent: Wednesday, January 23, 2019 4:42 PM
To: DNR WQSS APMSA
Subject: Draft APM

Hi

Some lakes such as the FDL Long Lake Preservation Association does not support enough property owners to properly fund APM activates without outside state funding. Help in any form is important. Approximately 70% of our lake frontage is owned by the DNR and a boy scout camp. That leaves 30% to fund the APM for the whole lake.

I spent some time going through the draft of the "WDNR Strategic Analysis of Aquatic Plant Management". Without a lot of time to dive deeply through the whole thing, I did read through the various alternatives in chapter 8. For most of the alternatives, they seem to carry good merit for some and not for others. The tables helped with listing the pros and cons.

I participated in the initial meeting last year when you asked for comments on the future of the grants program. I see many of the items brought up as suggestions were one way or another implemented in this document. Thank You.

Replying to an email does not allow one to hear both sides of the issue. I suggest you pull a work group together of DNR staff, Stakeholders that have or had grants and stakeholders that requested funding and not yet approved or was rejected. This workgroup diversified should be able to compromise on a final plan.

Tom

Thomas E Hinchliffe
[redacted]
Campbellsport, WI 53010
[redacted]

McCord, Ashleigh I - DNR

From: Bill [redacted]
Sent: Wednesday, January 9, 2019 6:55 PM
To: DNR WQSS APMSA
Cc: 'Russell Senso'; Bob Nack; Gus Nordholm; 'Eddie Heath'
Subject: WDNR strategic analysis of Aquatic Plant Management

I am providing these comments as a representative of the Roberts Lake Association in Forest County. Our situation is very narrow—an infestation of EWM—and my comments relate primarily to that issue. I only read and am responding to a few sections that were recommended to me as germane to Roberts Lake.

First, a couple of comments on issues that don't seem to be specifically covered in the draft, but which, in my opinion, are very important.

- Dealing with EWM in Roberts Lake is going to be a major concern far into the future. We can forget any dreams we may have had that this problem is going to go away or be reduced to a minor annoyance. My strong personal opinion is that it's unfair and unrealistic for the DNR to expect that the Roberts Lake Association (RLA) should be responsible for primary, expert invasives management, plus the financing of a response plan. Roberts Lake is a water body that is available to and frequently used by people from all over the state, and from many states beyond. Wisconsin DNR and Wisconsin Tourism advertise it as a resource for use by any and all. The RLA is a small, volunteer organization, with income limited to a single fund raiser plus nominal dues from a few dozen families, and occasional contributions. I believe the DNR should help develop and then approve our response plan, and then provide <u>all</u> financing for it.
- Our issue is *invasive* aquatic species (AIS), and much of the strategy pertains to aquatic plant management (APM) in general. Managing non-invasive species may not be germane to Roberts Lake. My view is that managing invasives ranks far higher in importance than managing native plants.
- Part of the strategy seems intended to reduce "friction" between the DNR and other stakeholders. I have worked a lot with DNR people and have not experienced any friction. They have all been friendly and helpful. However, the DNR is a bureau, and many of their procedures are "bureaucratic," (rules, procedures, forms, permits, approvals, etc.), and these can be a major annoyance and really slow things down. They should be streamlined and, where possible, eliminated.
- As far as the alternatives beginning on page 57, "Management Alternatives," and "Collaboration," here are my thoughts. I'm commenting only from an RLA perspective, which as of now has involved dealing only with EWM. I have really not had problems with "collaboration." (NA=not applicable to RLA; NC=no comment)

    1. Mostly NA. I'm not a fan of study groups.
    2. With a little initiative it's not hard to get help now. I'd worry that participating in a mentorship group would just add another hoop to jump through.

3. I don't like this idea. It's likely to increase friction by inviting non-constructive input from minor stakeholders or non-stakeholders.
4. NC
5. But seems like overkill, since in many invasive plant situations pesticides would never come into play.
6. Same comment as preceding.
7. NC
8. NA Except that more and new forms are generally not a solution to anything.
9. NC
10. NC
11. NA, but I agree.
12. Agree
13. NA, but I'd rather see money spent on *doing* something rather than coordinating.
14. I'm adding this as my own suggestion. Well trained DNR personnel should be enabled to cut through or go around some of the standard "bureaucratic" processes and procedures when, in their judgment, it's appropriate to do so. They should focus on customer needs rather than procedures.

- Here are my comments on items 8.6 and 8.7 beginning on page 82. These sections concern DNR permits and definitely DO apply to RLA, since we have been obtaining DNR permits for the last several years and will probably continue to do so in the future. Here are my comments on 8.6, Consistency, beginning on page 82.

1. Agree
2. Agree
3. The idea is not bad, but I see too much emphasis on the process as compared to the result. If a flow chart or flow process is used, one of the first steps should be to separate the treatment of invasives from the treatment of non-invasives.
4. Training is important, but this point seems to imply that current staff are not trained, which does not line up with my experience. More importantly, I think staff should be enabled and encouraged to cut through the rigamarole listed in the flow charts, manuals, forms, reporting requirements, etc., especially in respect to invasives, when they judge that is appropriate. Further, training people for functions they will never be involved in would be a waste.
5. NC
6. This should be a given, but again, invasives need to be considered separately.
7. Strongly agree, as long as simplicity is one of the goals.

Here are my comments on 8.7, Grants:

1. Agree, but this is too much of a wish list to get serious consideration from the budget people. It needs more focus, and invasives should take priority over other aquatic plant management.
2. Agree, again with invasives taking priority.
3. This sounds good, but without the specifics it's really not possible to evaluate this alternative.

4. Agree. Any and all approaches should be considered with effectiveness and efficiency being the deciding factors.
5. Agree. RLA is not a fan of herbicides.
6. Agree
7. Agree
8. Agree. It's hard to justify spending money to use herbicides on native plants if the same money could be spent to effectively control invasive plants.
9. I could see eliminating "grants" in favor of the state "just doing it," at least in respect to invasives, but taking the state out of the overall funding picture is not realistic.
10. Not all "partnerships" can be treated the same. An entity with taxing authority or other large financial resources, and/or one with employees to take the actions needed, is far different from a primarily social organization with relatively few members, fewer volunteers, and nothing but dues and fund raisers for income. I think that in the case of latter, the state should assume 100% of the responsibility and cost for managing *invasive* species. This is especially true when the state holds the waterbody out to be a public asset, requires it to have public access, and occasionally advertises it to the entire state and beyond as a public asset.

Bill
Hoffman

Roberts Lake Association, Forest County

[redacted]

[redacted]

McCord, Ashleigh I - DNR

From: Tim Hoyman [redacted]
Sent: Friday, January 25, 2019 1:52 PM
To: DNR WQSS APMSA
Subject: WDNR APM Strategic Analysis Draft Comments

Hello,

Onterra, LLC is currently supporting Eddie Heath's efforts on the nine-member APM Study Group comprised of non-WDNR stakeholders, but I feel it is appropriate for me to voice comments and suggestions relating to the Draft Strategic Analysis document. Eddie speaks for Onterra while he works for the committee and will detail edits, comments, and suggestions as he sees fit. At this time, I (Onterra) have these general comments:

1. The document was much too general in nature, with too many alternatives, which made it longer than necessary. Further, many of the alternatives that were included seemed to be knowingly unrealistic; therefore, the document lost some credibility. Overall, these issues made the document unreadable for many of the citizens that should have provided comments.
2. We support making the permitting process more consistent on a statewide basis. The permitting process needs to be flexible, but at this time, the process in the northern part of the state is overly burdensome while the process in the southern portion is almost careless. Yes, the waterbodies between the north and south are different and should be managed differently, but there needs to statewide expectations that create a foundation, then different regions can layout vetted guidance based upon science that add additional structure.
3. While the utilization of a technical review team has real and important value, it removes any one person from being the decision maker and the coordinator for that group. This leads to delays in decision making, a lack of transparency in the process, loss of confidence in the process, and no set endpoint for reviews on reports and requests for further analysis. The new statewide APM coordinator should be an objective, experienced biologist that can work with and provide structure to the technical review team, but ultimately be the person making the decisions.
4. We feel the AIS Grant Program is currently working reasonably well. However, there seems to be a disconnect developing between the grant program's priorities, as exemplified by the ranking questions, and what is being supported in some regions. Having the department define a strategic philosophy and direction for APM and AIS management will help provide consistency within WDNR programs and across regions of the state.

I appreciate the opportunity to provide comments.

Sincerely,

Tim

Tim Hoyman, CLM
Lead Aquatic Ecologist
Onterra, LLC
[redacted]
De Pere, WI
[redacted]

McCord, Ashleigh I - DNR

From: Julie Janquart [redacted]
Sent: Thursday, January 17, 2019 11:59 AM
To: DNR WQSS APMSA
Cc: Gary Mueller, LMA; Gary Goeman; Lynn Smith; mark truyman; Steve Parks; Julie Janquart; Eddie Heath; Les Schramm
Subject: LMA Comments on Aquatic Plant Management [APM] Draft Strategy Analysis

Follow Up Flag: Follow up
Flag Status: Flagged

January 17, 2019 11:59am

To Whom It May Concern:

Please review the letter below which serves as official input from Lake Metonga Association, (Forest County) as adopted by the entire board.

Respectfully,

Julie Janquart,

LMA Secretary

January 17, 2019

TO: WI DNR APM Committee

Re: Comments on Aquatic Plant Management [APM] Draft Strategy Analysis

Dear Committee;

As an experienced and major participant in controlling invasive EWM in our lake for the past twenty years, the Lake Metonga Association (LMA) in Forest County is very appreciative of the DNR and all involved stakeholders for this APM effort — to bring uniformity to this complex code issue as a means to yield direct, positive and measurable impact on the equally complex nature of Wisconsin's diversified waterways.

APM is a growing and new concern for many, so following all rules as ascribed is appropriate. But, for Stakeholders who have demonstrated measurable APM capabilities, consistent long-range alternative management options should also be available. For example, the cost and time investment (from the LMA, Army Corps of Engineers, water consultant specialists, and WI DNR), over the history of our EWM infestation amounts to hundreds of thousands of dollars, as well as thousands of hours of volunteer time. This type of investment, experience and knowledge base should be harnessed and

custom tailored into the specifics of each lake's APM parameter set, and incorporated into a *Ten Year Lake Management Plan*, which then becomes a part its permanent lake management record database for ready reference. Think of it as an ongoing healthy living plan and permanent medical record file tailored to the needs of each water body.

A few specific comments:

- Table 8-6, Par 3 (page 85): Appendix D should include key reference materials specific to each lake, such as: acreage, mean depth, minimum aquatic plant acreage for fisheries, historic range and variation of EWM infestation, identify nuisance/matting areas, map proximity to boat launches, public beaches, etc.
- All Chemical Treatment Control Strategies should include some degree of field-based, alternate day-of-treatment options when warranted (i.e. wind and current conditions, etc.). As noted in the APM analysis, chemical application has a limited window of effectivness with measurable results only achieved under ideal conditions. Dumping chemicals into a lake because "today is your day" for treatment and "these are the permitted acres" does not serve any of us well.
- Mechanical and hand harvesting in accordance with established guidelines should be allowed under a general lake permit. Harvest monitoring should be handled by our County AIS Coordinator with DNR oversight. Most lakes in our county are frequented by DNR Wardens. County Rec Officers can bring the AIS Coordinator along when necessary.
- Chapter 8.7 Grants (page 91): In an ideal world, the state would establish a "Waters of Wisconsin" mill tax sufficient to manage our state's most valuable resource. In reality, our state's legislature moved a giant step backwards last year by eliminating the Forestry Mill Tax that has been in effect since 1927. The Forestry Mill Tax would have better served all of us, if it had been *expanded* to include waterways as well as forests. End result: bragging rights for "cutting taxes" while sweeping the real and inevitable costs under the carpet. So, who ultimately has to pay the bill? Somebody does.
- The funding options available to our lake stakeholders is as varied as the lakes themselves. Lake Metonga has enjoyed an excellent grant history with the state during our twenty-year treatment period. But, it's worth noting, that each year treatment was denied, infestation doubled. End result: save money one year, compound treatment acreage and cost the next.

In conclusion: what is *our* objective for LMA's APM? If the state established the APM program with the parameters outlined above, we feel we could reduce our grant needs by 50%, with hopes that grant reliance could diminish even further once ongoing, sustainable APM is achieved.

It's worth noting that all of the DNR grants we receive require LMA matching funds. Since Lake Metonga is not able to form a Lake District to fund our share of any APM program, we have nonetheless, been fortunate in developing measurable support from the adjacent City and Township, two adjacent Tribal Communities, the County, and a large annual fund raiser. We consider ourselves very fortunate. So, how are less fortunate lake bodies left to cope? Does their water get better on its own?

As with human health care, avoiding or denying any or all medical attention will not cure an intractable ailment, and often leads to more severe and more costly ongoing treatment down the road, not to mention the risk to all from the spread of infectious (invasives). EWM and other lake infestations are incurable, but are treatable. Environmental and cost efficacy and efficiency is what each lake's individual APM compass should be calibrated to. As Founding Father, Ben Franklin, put it with his analogy to mending worn socks: "A stitch in time saves nine." The problems facing Wisconsin's waters is getting larger, more expensive, more complicated — not smaller, cheaper, easier. We encourage the DNR to implement effective, workable APM for the benefit of Wisconsin's diversified and individualized water bodies, and for the legions of Stakeholders and volunteers, such as the LMA, that are trying to help.

We sincerely hope that you can bring this important issue to a positive end ASAP.

VTY

LMA Board

Crandon, Forest County, WI

_____

A personal note from the LMA President.

About 40 years ago, I was involved when the WI Plumbing Code began the identical process you are undertaking with the APM Strategy. The template used for the Plumbing Code transition to an Administrative Code proved to be the key component in this successful transition.

Education, both initial and continued, of ALL Stakeholders — from the tradesperson in the field to the department administrators — was the decisive factor. Plan examination, in satellite offices throughout the state, in conjunction with a viable, published code Appendix and Variance Procedures, replaced all the shoot from the hip personal interpretation that undermines the success of any program.

I hope your APM Strategy is as successful in managing our Wisconsin Waters as Wisconsin's Administrative Plumbing Code has been in protecting the health of its citizens.

McCord, Ashleigh I - DNR

From: James Kannenberg [redacted]
Sent: Thursday, January 24, 2019 8:29 PM
To: DNR WQSS APMSA
Subject: Comments Concerning the WDNR's Strategic Analysis Draft and Management Alternatives

Please fond the following comments from our company concerning the Wisconsin DNR's strategic analysis draft and management alternatives.

7.4. Implications of Recent Findings on Herbicide Use in Aquatic Environments
We should be avoiding generalities. 10 acres defining large scale treatment depends on the total acreage of lake. Also consider biomass/impairment reduction of AIS instead of just frequency of occurrence when deciding if a treatment was successful or not. We have not had many small scale treatment failures using systemic herbicides, which is contrary to what is stated or implied in this section.

8.1. Collaboration

Collaboration - Alternative 1. Create an APM Study Group for communication and collaboration with stakeholders on the direction of APM policy in the state.
This is a good idea as long as it includes representation from the industry.

Collaboration - Alternative 3. Establish a more public and open process around APM activities and decision-making during the APM permitting process.
This is not necessary. The option for public meeting has been around for a long time, and there has only been enough interest about 5 times since 1989. Implementing something that may increase the length of time of the lake permitting process is not a good direction to follow.

Collaboration - Alternative 7. Implement strategies to support further adoption of Integrated Pest Management (IPM) in APM practice.
While implementing IPM is important, forcing certain methods to be used when they don't have a chance of being very effective is not a good idea. For example, mandating that DASH be used on acres of EWM.

Collaboration - Alternative 10. Reduce APM permitting fees to make APM more affordable for permittees.
The current APM fees are not the issue with people choosing to treat legally or illegally. The usual reason people choose not to treat is "we don't want the DNR in my backyard".

Collaboration – Alternative 11. Reduce department reliance on limited-term employees (LTE) for implementation of the APM program or designate specific scenarios in which permanent staff should take on the work.
Yes, the LTE employees often have little to no experience in interpreting the code. Either finding a way to retain them longer term, or shift it to permanent staff would be helpful.

Collaboration – Alternative 12. Request input from APM stakeholders at annual meetings on research questions of interest.
This would be helpful in cooperation from the industry side of things. Partial cost sharing would likely be available from various industry groups in regards to research projects, etc.

Collaboration – Alternative 13. Create a new permanent position within the department to facilitate collaboration between the department and APM service providers.

A full time person that is in our water management region would be the best choice for communicating with us.

8.2. Department Resources and Workload

Resources and Workload - Alternative 1. **Increase the number of department APM staff.**
An increase in APM staff may not help to decrease workload because some of the increase in workload can be contributed to the decisions made by some of the current full time staff such as:

1. Changing policies during the busy time of the year. This causes unnecessary friction and headaches to everyone involved
2. Waiting until the last moment (day 14 or 15) to review a permit. This causes unnecessary friction and stress between APM staff, applicators, and other stake holders.
3. If a lack of equipment (trucks and boats) prevents APM staff from completing directed supervision, we should not have to halt our own schedules

Resources and Workload - Alternative 2. **Create new DNR positions specializing in APM and AIS for each region of the state.**
This specialization would decrease workload and increase efficiency since the current lake biologists are already spending a lot of time supervising current APM staff

Resources and Workload - Alternative 3. **Reduce regulation of APM in private ponds.**
A multiyear permit would decrease the amount of work for everyone. Small ponds don't change much form year to year, thus the management doesn't change much from year to year. If multiyear permits are implemented, reporting requirements should be kept the same and an easier option needs to be added so that new products can be added to the permit as they come available.

Resources and Workload - Alternative 4. **Allow issuance of multi-year permits for chemical APM projects in public waterbodies, following the approval of an APM plan.**
As long as permit fees and requirements are updated and oversite continues during the duration of the permit, treatments would be conducted in an ecologically responsible manner as well as in accordance to the product label.

Resources and Workload - Alternative 5. **Increase permit exemptions and/or develop general permits when the purpose of management agrees with the purpose of NR 107.**
Keep exemptions to a minimum. Most public treatments are for the control of aquatic invasive species. This already meets the requirements of NR107.

Resources and Workload - Alternative 6. **Increase APM permitting fees to support additional staff, efficiency, and collaboration.**
An increase in fees to support more staff does not mean there will be an increase in efficiency and collaboration. See notes listed in 8.2 alternative 1.

Resources and Workload - Alternative 8. **Partner with DATCP to develop a certification program specifically for APM in public waters.**
This is unnecessary. The label is the law and will always be followed when conducting pesticide treatments. In addition, there would likely be little difference between the current aquatic pesticide certification and this newly created class.

Resources and Workload – Alternative 10. **Designate a specific annual time-window in which APM permits can be submitted and processed.**
Limiting the application time for permits would only create friction between APM staff and applicators/stakeholders. Many permits arise every year during the treatment season by people who want weeds and algae take care off for a specific event or time during the year, or who have a sudden, previously un-encountered problem. Forcing them to adhere to a strict permit application window will only alienate these people and encourage illegal treatments without DNR oversite.

8.3. Public Outreach and Communications

Outreach and Communication - Alternative 3. **Dedicate DNR APM staff to periodically revising informational factsheets and outreach materials with the latest information to keep messaging current.**
Industry should be involved in this process. We can help contribute to new APM discoveries and practices as well as help to disseminate information on best management practices.

8.5 Integrating New Information

Alternative 5. Require monitoring of aquatic plant communities on all waterbodies where APM is conducted
- This potential requirement is a non starter. Elevating monitoring beyond grant funded treatments to all applications would be a huge strain on both the departments limited personnel as well as contractors and financial resources of the lake districts and property owners.

Alternative 6: Require herbicide concentration monitoring for aquatic herbicide treatments supported by department grant funding.
- Yes and we believe it already is required.

8.6. Consistency in Evaluating Permit Applications
Alternative 2. Standardize the specific aspects considered in the permit review process and the methods by which they are evaluated.
- Standardization does not take into consideration the variables of the resource. One size does not fit all.

Alternative 6. Develop a working definition for the social and environmental conditions that warrant APM
- Best defined by a locally funded aquatic lake management plan. Again a one size fits all approach isn't acceptable.

8.8 **Watershed Health, AIS Prevention, Enforcement, Overall Emphasis, and Other Topics**

Alternative 2. Develop a classification system for Wisconsin waterbodies to support management decision-making.
- Use the eco region classification for evaluating EWM control.

Alternative 4. Allocate more resources toward preventing introduction of non-native plants to waterbodies with higher chances of negative ecological consequences of those non-native plant species.
- The DNR should have the authority to close boat launches on waterbodies that contain "new" invasive species(i.e. hydrilla and starry stonewort)

Alternative 5. Increase collaboration with and/or enforcement of industries which provide pathways for the spread of aquatic invasive plants
- Yes. Monitor those such as pier installers and shoreline remediation work that utilizes boats/barges coming from other areas and waters.

Alternative 9. Increase regulation of APM in private ponds.
- Absolutely not. This will only increase the opportunity for conflict between pond owners, contractors and DNR staff. DNR staff time is already very limited and pond owners already want less regulation and increasing will only embolden a negative perception of the department.

Sincerely,

Jim Kannenberg
National Manager- ICMS Services

Marine Biochemists
A Lonza business
[redacted]

This communication and its attachments, if any, may contain confidential and privileged information the use of which by other persons or entities than the intended recipient is prohibited. If you receive this transmission in error, please contact the sender immediately and delete the material from your system.

McCord, Ashleigh I - DNR

From: Ed Kissinger [redacted]
Sent: Sunday, January 20, 2019 9:29 PM
To: DNR WQSS APMSA
Subject: Comments on Strategic Analysis of Aquatic Plant Management

I have spent a considerable amount of time reading this draft. I find it interesting albeit somewhat lengthy and redundant.

A strategic analysis of APM is a worthwhile endeavor. The management of aquatic plants, especially invasive plants, is critical to maintaining good lake ecosystems. Some twenty plus years ago EWM was first detected in Silver Lake in Waushara county. The reaction by the DNR and people in general was 'so what'. In 2016 we had over 80 acres of EWM/HEWM infecting a lake of approximately 350 acres. I feel it is imperative that the State of Wisconsin continues to support groups like ours in the battle to keep lakes like Silver in a good condition so that the people of the Wisconsin can continue to enjoy them. It is not the sole responsibility of lake owners to provide for and maintain the lakes. It is a state wide responsibility. If you can use them, you should help support them.

The document addresses many critical issues. However, in my opinion, it presents too many ideas that make little if any sense. It is VERY obvious that invasive species cause economic and ecological harm but in 7.2 it is written such that it is a question. That might have been the case years ago but to imply such today is wrong. The economic impacts of recreational lakes choked with invasive aquatic plants not only impacts the property owner, it impacts the state and local tax base. If people cannot enjoy recreation on a lake, the local economy suffers. Having an effective APM is beneficial to everyone.

There are many valid points expressed. The need to have a lake management plan is one of them. It is also very important to have an after action plan to monitor results after action is taken. It is imperative that this be an on going multi year investment. It is only through a good monitoring process that one can truly understand the effects of treatment protocols. Just doing some type of treatment and walking away is not good.

Collaboration is stressed in 8.2. This is worthwhile but it comes with a cost. Although getting people and groups to collaborate is laudable, I think that it very difficult to do and I question if this the best way to invest limited dollars. To do this in a consistent manor is not easy and very time consuming.

In section 8.7 Grants are discussed. Grants are critical to allowing APM to happen. Grants allow the state to be involved in the planning and after action efforts. I do not feel that grant fees should be increased. Looking at the information given about other states, it appears our program is in line or maybe towards the upper end. I feel a better source of income to fund grants would be an increase in the boat registration fees that would be specifically dedicated to APM activities. Another option would be to cap the grant at a 50% match limit. Grants could be set so you could control the use by time periods. If you had a grant in the last X years, you are not eligible. The use of the money from a grant should be determined at the local level, not by some bureaucrat high in the organization. This could help with collaboration.

The ideas presented in 8.8 appear to be costly and counter productive. Some appear to be hard on tourism and others are simply expensive or somewhat unrealistic.

I feel that we could improve the permit process by doing multi year permitting is some cases. One example would be the use of DASH. Why not grant a two or three year use permit for this type of work? No chemicals are involved.

I found the sections on chemicals valuable. I also felt the summary on plant removal was very worthwhile. The permit process explanation is quite good.

Ed Kissinger, Chairman
Silver Lake Management District
Wautoma, WI 54982

McCord, Ashleigh I - DNR

From: Nault, Michelle E - DNR
Sent: Monday, January 7, 2019 12:18 PM
To: DNR WQSS APMSA
Subject: FW: APM SA comments
Attachments: APM SA Knight comments.docx

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Michelle E. Nault
Lakes and Reservoir Ecologist
Bureau of Water Quality
Wisconsin Department of Natural Resources
Phone: (608) 513-4587
Michelle.Nault@wisconsin.gov


```
 ,__,
(o,o)
(  \)
-"-"-
```

dnr.wi.gov

From: Susan Knight <seknight@wisc.edu>
Sent: Monday, January 7, 2019 12:11 PM
To: Schaal, Carroll - DNR <Carroll.Schaal@wisconsin.gov>; Mikulyuk, Alison F - DNR <Alison.Mikulyuk@wisconsin.gov>; Nault, Michelle E - DNR <Michelle.Nault@wisconsin.gov>
Subject: APM SA comments

Hi Carroll, Ali and Michelle,
I hope I am not too late in getting these comments to you. These comments refer only to the first chunk (beginning through p.118). This was clearly a huge undertaking, and congratulations on rounding up so options on so many different topics. I apologize if some of my comments are due to an incomplete or inaccurate reading of the document. I am happy to discuss any of these at greater length, if desired.
Thanks again for all your work on this.
Susan

Susan Knight
Interim Director
Trout Lake Station
UW-Madison Center for Limnology
WI DNR
3110 Trout Lake Station Drive
Boulder Junction, WI 54512
715-356-9494

Knight comments APM SA

1. IPM p. iii., 13-15 "…but the potential for development of herbicide resistance in aquatic plants is one of the major reasons for supporting implementation of various management techniques." I feel IPM is touted as the best way to deal with AIS, but the focus of the SA remains herbicides. I realize there aren't many alternatives for large scale treatment. However, in the Non-chemical Approaches and Integrated Pest Management Section (p.13), I feel the recognized useful strategies, such as harvesting and DASH, are mixed in with the unapproved (carp, rollers) so that people must wade through a mish mash of approaches, without being helpful in a straightforward way.
    a. Figure 2.5 reports "Growth in the scale of APM treatment in WI" but this is APM treatment with 2,4-D. The caption should reflect this. A figure that reports acres treated without 2,4-D would be helpful. Overall, my impression is that there is only lip service paid to non-chemical treatment, though there is significant effort spent on negative consequences of chemical treatment.
2. Grants. p. 20. "Dredging and most mechanical harvesting activities are not currently eligible activities under AIPC grants because they are considered too expensive and routine maintenance activities, respectively." Leaving dredging aside, I feel you should recognize that since we have discovered problems with chemical treatment (unintended consequences for non-target plants and animals, possible selection for chemical-resistant hybrids), the state should consider allowing harvesting as a grant-supported treatment option. I feel:
    a. There should be strict and clearly defined limits on grant-supported use of chemicals. Many groups are using chemicals because they are convincing lake managers that their need is not simply nuisance control, and therefore eligible for grants.
    b. The state should reconsider paying for harvesting, at least as a trial method for testing whether harvesting can be a satisfactory means of controlling AIS.
    c. My impression is that lake groups are using chemicals at least in part because the state will pay for it but will not pay for harvesting. Sometimes harvesting is the best method, but its use is competing against a financially supported, but poorer option in herbicides.
    d. I think a larger portion of grant moneys should go to prevention, with funds allocated to pay launch monitors earlier and later in the year.
3. Economic costs. p.28. This analysis seems fraught with assumptions and extrapolations that make it of questionable value. The respondents were asked how much they would pay if all the lakes near them were invaded, but since only 10% are actually invaded, the authors said that means they would only be willing to pay 10% of that amount. I am not a social scientist, and don't know how these studies are done, but the results seem suspect.
4. Other Aquatic Plant Management-Related Concerns, p. 39. I support others interested in changing APM code to incorporate greater ecological protections.
5. Current Practices p. 41. I don't understand the organization here. There was already a long section on Aquatic Plant Management Past and Present, and it is rehashed here. It is useful information but should be consolidated. The document is so long, it is hard to find the important nuggets. Maybe the "beneficial use" topic must be formally discussed?
6. Implications of Recent Findings…p. 47. "…so employing repeated treatments in lakes with high biodiversity may be inadvisable." Fluridone is in a lake for up to, or more than, one year. I believe this should be considered a repeated treatment, and not used on lakes with high

biodiversity. At least, this document should acknowledge that long-lasting herbicides have different effects on the target and non-target plants (and probably animals).

7. Implications of Recent Findings…p. 48. "Understanding the ecology of aquatic plant communities and life history…" Management considering seasonality of some species runs counter to consideration of stratification. Planning early treatments to treat CLP or EWM because these plants are active early is at odds with planning treatments later in the season to allow a lake to stratify to minimize the quantity of herbicide applied. This should be explicitly acknowledged and resolved.
8. Herbicide Resistance p.50. Bullets of strategies to reduce herbicide resistance are well meaning, but unlikely to be considered, unless actual practices can be suggested. E.g. Develop policies and short-term incentives… - one approach might be to encourage more harvesting or DASH. "Conduct and promote research…" Research done in the private sector is likely restricted to the development of products that must be purchased. Other research probably must be done by non-commercial entities. "Incentivize new APM techniques" Harvesting, DASH and living with AIS should be encouraged.
9. P.51. "…Non-target effects can be substantial…" I feel this is a critical point but is a bit of a non-sequitur in this section about commitment to management. I suggest a separate section on non-target effects. See also p.47. "...likely to have greater non-target impacts lake-wide..."
10. Lake Management planning…p.50-51 topics - Maybe consolidate all the topics to do with planning into Section 2.6 that deals with grants and APM.
11. Monitoring p.52. "The frequency of timing…" If monitoring should be done season to season, there should not be any situation where a lake is treated with herbicides two years in a row. Otherwise, effectiveness of treatment can not be established. This runs counter to oft-cited usefulness of treating CLP many years in a row to rid the lake of turions. I think this is an excuse to repeatedly use chemicals though their effectiveness is unproven.
12. Specific Goals p. 53. Why assess turions or other propagules? Why not monitor plants the following year?
13. Variation around the state, p. 53-54. I am glad to see the acknowledgement of differences in native plant communities, AIS, chemistry, housing development in north and south. However, I felt the statement "… differences in management philosophies throughout the state, making consistent statewide implementation of APM policies a challenge" is not strong enough. There should be a statement that management strategies will be different in different regions of the state because of these differences.
14. Collaboration, p. 58. Alternative 1. Is the proposed APM Study Group different from the APM Tech team? If so, how? If FTEs instead of LTEs, could be good. It is challenging for new LTEs to make these decisions.
15. Collaboration, p. 58. Alternative 2. Is this a mentorship program for staff or citizens? Either way, I applaud this idea.
16. Collaboration, p. 59. Alternative 5. From my experience, taking a one-day class and exam, most of the certification information that is tested is irrelevant to herbicides (much was focused on killing mosquitoes) and is a waste of time for staff. Also, I do not remember anything in that book/course that discussed the ecological effects of chemical management activities (but it has been a few years and I could be wrong). I feel this maybe have been suggested by applicators

with a “misery loves company” attitude in wanting state staff to be subjected to and inconvenienced by this process.

17. Collaboration, p. 60. Alternative 7. I applaud increased emphasis on IPM.
18. Collaboration, p. 60. Alternative 8. I understand the issue regarding wetlands, but most APM issues are along shorelines. Does this refer to shorelines along wetlands?
19. Collaboration, p. 60-61. Alternative 10. I do not see any advantage to decreasing fees and doubt it would reduce illegal use. Why encourage “a larger number of interested individuals in conduct APM”? Does this mean individual lake groups, or individuals on a lake, which I believe is illegal? Can an individual apply for a permit to treat AIS near their home?
20. Outreach, p. 68. Alternatives. All seem worthwhile.
21. Program Tracking, p. 73. Alternative 2. This could be DNR-funded research.
22. Integrating New Info, p. 75. Alternative 1. Good idea. For example, WDNR staff need a way to learn about new herbicides besides listening to corporate representatives describe benefits.
23. Integrating New Info, p. 76. Alternative 5. Not as important as 7,8.
24. Integrating New Info, p. 76. Alternative 6. Yes, combined with Alt. 5, this would add to our knowledge about effective treatment rates and achieved chemical concentrations. But not as important as 7,8.
25. Integrating New Info, p. 76. Alternatives 7,8. Most important of all these alternatives.
26. Consistency Alternative 1, p.80. I could be wrong, but this sounds like a vaguely worded effort to make the basis of APM procedures and permit decisions uniform throughout the state. I do not think that is a good idea. If it is known that southern 2,4-D treatments very likely degrade within a couple of days, it is a waste of time to insist 2,4-D is monitored in every lake. On the other hand, permit decisions in the north should be decided based on information of individual lakes: plant diversity, lake chemistry, treatment history, etc. Decisions should not be based on state-wide criteria.
27. Consistency Alternative 2, p.80. The process could be largely the same throughout, but decision criteria should not be the same. I feel it would be valuable to have a bank of example situations and management decisions based on previous experience to help guide future situations. For example, here are three different situations, and three possible management guides:
    a. **AIS situation**: lake-wide, but scattered; **management**: DASH, every year, good results.
    b. **AIS situation**: dense, topping out AIS in a few areas; **management:** took “wait and see” approach, AIS did not expand, but got denser, eventual chem treatment likely.
    c. **AIS situation**: widespread, dense AIS; **management**: mechanical harvesting, lake owners not happy but reasonably content.
28. Consistency Alternative 3, p.80. Flowchart could be guide, but should not be hard and fast rule. It is impossible to have general flowchart consider every unique characteristic of a lake. But this idea could be combined with my suggestion above regarding Alternative 2.
29. Grants, Alternative 1. Good idea, if this doesn’t necessarily mean more funds for chemical applications.
30. Grants, Alternative 4. As I have suggested elsewhere, I agree that funding harvesting could be an effective alternative to chemical treatment.
31. Grants, Alternative 7. I agree that grant funding for well established populations should be lowest priority of funding.

32. Grants, Alternative 8. I would be in favor of at least reducing funds for chemical treatment. I think, (or hope) this could encourage greater industry effort at non-chemical solutions.
33. Grants, Alternative 9. We need some creative solutions, and I hope future lake leaders and lake management specialists have good ideas to develop these strategies.
34. Watershed Health. All of these alternatives seem worthy. Alternative 2 might open a can of worms. Alternatives 1, 3-5 seem especially valuable.
35. Are these topics addressed? Possibly I did not recognize them within the text. Maybe not the purview of the SA?
    a. How does staff deal with impression citizens have that DNR is not "letting them treat"? Maybe embedded in outreach alternatives?
    b. Research results on spot treatments suggest these are ineffective. Can staff use these results to aid in their decisions, and if so, what if this conflicts with consultant recommendations?
    c. How do staff decide about requests to repeatedly treat lakes? Are grant-supported treatments and non-grant supported requests to chemically treat evaluated differently?
    d. How do staff resolve what is legal (e.g. using new DATCP-approved chemical) when it may go against best professional judgement?
    e. If a lake management plan is approved, does this mean a permit to do what is stated in the plan must be approved?
    f. Many lake plans establish plant density or acreage "triggers" for chemical treatment. I don't think these should be allowed in plans, unless they are triggers to reassess the plan, but not for chemical treatment.
    g. Could lakes with high diversity of natives be off limits to chemical treatment with long-lasting herbicides (e.g. fluridone), with expectation that many natives are likely to be negatively affected and lost natives will likely to be replaced by AIS?

McCord, Ashleigh I - DNR

From: Larry A Kreiter [redacted]
Sent: Monday, January 21, 2019 2:59 PM
To: DNR WQSS APMSA
Subject: APM in Wisconsin: Draft Strategic Analysis

Comments on draft regulation

To whom it may concern,
I am the president of the homeowners association on a small 200 acre lake. Our lake has had plenty of trouble with invasive species and we have done our best to keep them at bay so we may enjoy the lake. Most of our work has been with chemical treatment as this has been deemed the easiest way to control.

My first comment on the new draft is that it is very hard for the lay person to understand unless one is working with this material on a daily basis or has a degree in this field. These new regulation may create more jobs in this field. If it does the DNR needs to licences these business's and let their licensing be able to make the decisions that usually requires state involvement.

Grants still need to be made to smaller lakes like ours that do not meet all of the current criteria. People that live on lakes generally pay more in taxes and all lakes should receive equal treatment when grants are considered.

These new rules should be used as guidelines as each lake or pond to be treated has it's own personality. What works on one lake may not work on another. Southern parts of the state are far different than the northern lakes. You can not use a cookie cutter design.

Please keep in mind that most people want to be good stewards of the lakes and do what is best but still would like to use the water for recreation and enjoyment whether fishing, swimming or skiing. We do not want to deal with a lot of government red tape.

Respectfully,
Larry Kreiter

McCord, Ashleigh I - DNR

From: Tom Lloyd [redacted]
Sent: Friday, January 25, 2019 9:42 AM
To: DNR WQSS APMSA
Subject: APM Strategic Analysis comments

Hello,
Please find my comments below regarding the APM Strategic Analysis document.

7.4. Implications of Recent Findings on Herbicide Use in Aquatic Environments
We should be avoiding generalities. 10 acres defining large scale treatment depends on the total acreage of lake. Also consider biomass/impairment reduction of AIS instead of just frequency of occurrence when deciding if a treatment was successful or not. We have not had many small scale treatment failures using systemic herbicides, which is contrary to what is stated or implied in this section.

8.1. Collaboration

Collaboration - Alternative 1. Create an APM Study Group for communication and collaboration with stakeholders on the direction of APM policy in the state.
This is a good idea as long as it includes representation from the industry.

Collaboration - Alternative 3. Establish a more public and open process around APM activities and decision-making during the APM permitting process.
This is not necessary. The option for public meeting has been around for a long time, and there has only been enough interest about 5 times since 1989. Implementing something that may increase the length of time of the lake permitting process is not a good direction to follow.

Collaboration - Alternative 7. Implement strategies to support further adoption of Integrated Pest Management (IPM) in APM practice.
While implementing IPM is important, forcing certain methods to be used when they don't have a chance of being very effective is not a good idea. For example, mandating that DASH be used on acres of EWM.

Collaboration - Alternative 10. Reduce APM permitting fees to make APM more affordable for permittees.
The current APM fees are not the issue with people choosing to treat legally or illegally. The usual reason people choose not to treat is "we don't want the DNR in my backyard".

Collaboration – Alternative 11. Reduce department reliance on limited-term employees (LTE) for implementation of the APM program or designate specific scenarios in which permanent staff should take on the work.
Yes, the LTE employees often have little to no experience in interpreting the code. Either finding a way to retain them longer term, or shift it to permanent staff would be helpful.

Collaboration – Alternative 12. Request input from APM stakeholders at annual meetings on research questions of interest.
This would be helpful in cooperation from the industry side of things. Partial cost sharing would likely be available from various industry groups in regards to research projects, etc.

Collaboration – Alternative 13. Create a new permanent position within the department to facilitate collaboration between the department and APM service providers.
A full time person that is in our water management region would be the best choice for communicating with us.

8.2. Department Resources and Workload

Resources and Workload - Alternative 1. **Increase the number of department APM staff.**
An increase in APM staff may not help to decrease workload because some of the increase in workload can be contributed to the decisions made by some of the current full time staff such as:

1. Changing policies during the busy time of the year. This causes unnecessary friction and headaches to everyone involved
2. Waiting until the last moment (day 14 or 15) to review a permit. This causes unnecessary friction and stress between APM staff, applicators, and other stake holders.
3. If a lack of equipment (trucks and boats) prevents APM staff from completing directed supervision, we should not have to halt our own schedules

Resources and Workload - Alternative 2. **Create new DNR positions specializing in APM and AIS for each region of the state.**
This specialization would decrease workload and increase efficiency since the current lake biologists are already spending a lot of time supervising current APM staff

Resources and Workload - Alternative 3. **Reduce regulation of APM in private ponds.**
A multiyear permit would decrease the amount of work for everyone. Small ponds don't change much form year to year, thus the management doesn't change much from year to year. If multiyear permits are implemented, reporting requirements should be kept the same and an easier option needs to be added so that new products can be added to the permit as they come available.

Resources and Workload - Alternative 4. **Allow issuance of multi-year permits for chemical APM projects in public waterbodies, following the approval of an APM plan.**
As long as permit fees and requirements are updated and oversite continues during the duration of the permit, treatments would be conducted in an ecologically responsible manner as well as in accordance to the product label.

Resources and Workload - Alternative 5. **Increase permit exemptions and/or develop general permits when the purpose of management agrees with the purpose of NR 107.**
Keep exemptions to a minimum. Most public treatments are for the control of aquatic invasive species. This already meets the requirements of NR107.

Resources and Workload - Alternative 6. **Increase APM permitting fees to support additional staff, efficiency, and collaboration.**
An increase in fees to support more staff does not mean there will be an increase in efficiency and collaboration. See notes listed in 8.2 alternative 1.

Resources and Workload - Alternative 8. **Partner with DATCP to develop a certification program specifically for APM in public waters.**
This is unnecessary. The label is the law and will always be followed when conducting pesticide treatments. In addition, there would likely be little difference between the current aquatic pesticide certification and this newly created class.

Resources and Workload – Alternative 10. **Designate a specific annual time-window in which APM permits can be submitted and processed.**
Limiting the application time for permits would only create friction between APM staff and applicators/stakeholders. Many permits arise every year during the treatment season by people who want weeds and algae take care off for a specific event or time during the year, or who have a sudden, previously un-encountered problem. Forcing them to

adhere to a strict permit application window will only alienate these people and encourage illegal treatments without DNR oversite.

8.3. Public Outreach and Communications

Outreach and Communication - Alternative 3. **Dedicate DNR APM staff to periodically revising informational factsheets and outreach materials with the latest information to keep messaging current.**
Industry should be involved in this process. We can help contribute to new APM discoveries and practices as well as help to disseminate information on best management practices.

8.5 Integrating New Information

Information Integration - Alternative 2. **Increase contract-based evaluation of APM projects.**

This is a great opportunity to include experts from every area, however, any APM project contracts must be thoroughly screened for any potential conflicts of interest. Some great organizations to pair with could be AERF (Aquatic Ecosystem Restoration Foundation), MAPMS (Midwest Aquatic Plant Management Society), and other academic institutions.

Information Integration - Alternative 4. **Develop a future-forward strategy for evaluating impacts of and management options for approaching AIS and other emerging issues**.

APM policies should always adapt to changing environments. The DNR has already taken a great first step in allowing treatments later in the summer and extending pond treatment dates until Nov 1st. This shows the DNR understands all aquatic ecosystems are affected by the ever changing climate and are willing to work with all stakeholders to find a balanced approach that works for the ecosystem and all parties involved.

Alternative 5. Require monitoring of aquatic plant communities on all waterbodies where APM is conducted
- This potential requirement is a non-starter. Elevating monitoring beyond grant funded treatments to all applications would be a huge strain on both the departments limited personnel as well as contractors and financial resources of the lake districts and property owners.

Alternative 6: Require herbicide concentration monitoring for aquatic herbicide treatments supported by department grant funding.
- Yes and we believe it already is required.

8.6. Consistency in Evaluating Permit Applications
Alternative 2. Standardize the specific aspects considered in the permit review process and the methods by which they are evaluated.
- Standardization does not take into consideration the variables of the resource. One size does not fit all.

Alternative 6. Develop a working definition for the social and environmental conditions that warrant APM
- Best defined by a locally funded aquatic lake management plan. Again a one size fits all approach isn't acceptable.

8.8 **Watershed Health, AIS Prevention, Enforcement, Overall Emphasis, and Other Topics**

Alternative 2. Develop a classification system for Wisconsin waterbodies to support management decision-making.
- Use the eco region classification for evaluating EWM control.

Alternative 4. Allocate more resources toward preventing introduction of non-native plants to waterbodies with higher chances of negative ecological consequences of those non-native plant species.

- The DNR should have the authority to close boat launches on waterbodies that contain “new” invasive species(i.e. hydrilla and starry stonewort)

Alternative 5. Increase collaboration with and/or enforcement of industries which provide pathways for the spread of aquatic invasive plants

- Yes. Monitor those such as pier installers and shoreline remediation work that utilizes boats/barges coming from other areas and waters.

Alternative 9. Increase regulation of APM in private ponds.

- Absolutely not. This will only increase the opportunity for conflict between pond owners, contractors and DNR staff. DNR staff time is already very limited and pond owners already want less regulation and increasing will only embolden a negative perception of the department.

Tom Lloyd
Crew Supervisor
Marine Biochemists-A Lonza Business
[redacted]

Please consider the environment before printing this email

This communication and its attachments, if any, may contain confidential and privileged information the use of which by other persons or entities than the intended recipient is prohibited. If you receive this transmission in error, please contact the sender immediately and delete the material from your system.

McCord, Ashleigh I - DNR

From: Nate Long [redacted]
Sent: Friday, January 25, 2019 1:50 PM
To: DNR WQSS APMSA
Subject: Comments for WDNR Strategic Analysis of Aquatic Plant Management in Wisconsin

To whom it may concern,

The purpose of the **Midwest Aquatic Plant Management Society (MAPMS)** is:

- to promote sound and appropriate technologies for the management of aquatic resources
- to provide opportunities for educational advancement
- to encourage relevant scientific research in the discipline
- to promote the exchange of information
- to expand and develop public interest in aquatic resources and their sustainable management

MAPMS provides information and assistance required by those who work with the unique ecological, sociological economic and regulatory concerns associated with managing aquatic plants in lake systems affected by exotic species, nutrient pollution, use conflicts and intense recreational demands.

Unfortunately, the Wisconsin Strategic Plan for APM was brought to the attention of the board of directors at a date too late for proper review and commenting. Our society and membership is dedicated to aquatic plant management. We would like the opportunity to offer support in this process in the future by connecting the DNR with all of the latest peer-reviewed literature on the matters at hand. We would also be willing to connect you with our membership, connect with the national Aquatic Plant Management Society, gain support through Aquatic Ecosystem Restoration Foundation and offer additional support through a dedicated workshop or panel of scientist that are currently leading the latest research on Aquatic Plant Management Efforts.

Sincerely,

Nathan W. Long-President, Midwest Aquatic Plant Management Society

McCord, Ashleigh I - DNR

From: [redacted]
Sent: Thursday, January 10, 2019 8:07 AM
To: DNR WQSS APMSA
Subject: Aquatic Pest Management - Herbicides use in state parks and other publ ic areas

Dear Governor Evers and DNR:

Thank you for inviting comment on the draft Aquatic Pest Management Plan. I am so pleased that we will again have a governor who values the environment long term and not just for the sake of today's business profits.

In Wisconsin, where we have coasts on two of the Great Lakes, we should be leaders in the protection of water quality. We must be conscious of the impact of using chemical herbicides or anything with a more permanent impact than the mechanical removal of unwanted aquatic plants. The effects of such substances as glyphosate and 2,4 D are far-reaching, sometimes farther than is even known.

If you doubt this, read about the clinics and hospitals in Southeast Asia, where thousands of children were born with birth defects or developed cancers that were previously unknown to the area after these defoliants were used. Non-Hodgkins lymphoma was a rarer disease in this country before Roundup became the lawn herbicide of choice. It is commonly also sprayed on food crops for greater yields or quicker harvest. People do not adapt and develop resistance as fast as bindweed or dandelions.

It is not as simple as determining whether manpower vs chemical control is cost effective in a given year. The use of these chemicals has longterm effect on things other than the weeds they are targeting.

In my humble opinion, planners in the DNR should each receive a personal copy of Rachel Carson's important works, Silent Spring and The Sea Around Us, before the next revision of the draft plan for Aquatic Pest Management. We must not just look at this year's results, but the bigger picture. While I recognize the need to control non-native species and other invasive weeds, the poisoning of our lakes and rivers is not an acceptable means of accomplishing this end.

The review should extend also to the way undesirable plants are managed in the state parks. I was appalled to see a large stand of ferns sprayed to shriveled brown in the middle of the summer. Aside from the risk to patrons of the park who walked directly next to this along the trail, this seemed an inappropriate attack on an otherwise attractive species. These plants are harmless, even useful. If not desired at that location they could have been cut or mowed. As resistance develops, greater amounts of herbicide would be "necessary" to achieve control. Not a good long term plan.

Thank you for your careful consideration of these concerns. On Wisconsin.

Sincerely

Holly Lutz
Wausau, WI

McCord, Ashleigh I - DNR

From: Jennifer McDermot [redacted]
Sent: Thursday, January 24, 2019 8:59 AM
To: DNR WQSS APMSA
Subject: APM Grant
Attachments: DNR APM final Draft.pdf

Here is feedback from The Berry Lake Property Owners Association Aquatic Management Committee.
Thank you

The Berry Lake Property Owners Association Aquatic Management Committee would like to thank you for the opportunity to respond to this " Aquatic Plant Management Draft Analysis. There is a good deal of good information in this document but it is far to lengthy. There are some elements appear to be things that the DNR should just be doing as action plans. Simply these include: more transparency, less bureaucracy, less paperwork, reduced application permit requirements, and mostly items in the outreach and communications section. The word in some sections labeled "ALTERNATIVE", should be titled "Action Plans" . Alternative" could imply the picking of one or two of the subtopics or that something needs correcting (which may be the case). In many cases the numbered "Alternative" sections this draft, are just common sense and good science. These should be considered a multiple strategy approach and pushed forward.

The Berry Lake Property Owners Association Aquatic Management Committee

SECTION 8.1 Collaboration

Collaboration - Alternative 1
Create an APM Study Group for communication and collaboration with stakeholders on the direction of APM policy in the state.
This is a good idea but don't like the idea of a "Study Group". People in this group should be be knowledgeable and be representative of all sizes of water bodies.
Should be named Advisory Counsel

Collaboration - Alternative 2
Establish a mentor-ship program for individuals new to the APM permitting process.
Good idea but maybe hard to find volunteers and ones without a hidden agenda. Not everyone n this committee agress with the hiddeen agenda portion.

Collaboration- Alternative 3
Establish a more public and open process around APM activities and decision making during the APM permitting process.
This is a bad idea. There currently are enough informational opportunities spelled out in the permitting process. This would only slow the process down and possibly bring in people that are not actually stakeholders that would disrupt actual progress. The last sentence in this alternative would also be true.

Collaboration- Alternative 4
Extend the maximum amount of time allowed for processing APM permits when collaboration with Native American tribes or the Great Lakes Indian Fish and Wildlife Commission (GLIFWC) are required.
Has there been a problem with this? Why should a tribe or any other group (business) need additional time?. This is just a stalling process that will take more

time and energy slowing the permitting process down needlessly. The tribes are stakeholders and should have been part of the permitting process from the start.

Collaboration- Alternative 5
Require all department APM coordinators to obtain and maintain Department of Agriculture, Trade, and Consumer Protection DATCP certification in aquatic pesticide use.
It would be great to have all APM staff knowledgeable of aquatic pesticide use but unnecessary to have them all certified. Some of us do feel it is important to have all certified. There should be several people on the permitting staff that should be certified as well as the over site staff of the Department of Agriculture. Department of Agriculture staff, as they were involved in the application approval process and were on site to verify the concentrations of the permit request during application of the pesticide).

Collaboration- Alternative 6
Require DATCP pesticide applicator certification or other training certificate for consultants who do not conduct chemical treatments but define treatment areas and choose products and application rates.
It makes sense that private consultants be certified. The permit application does require that now. There may be no need for this alternative and should not require additional collaboration.

Collaboration- Alternative 7
Implement strategies to support further adoption of Integrated Pest Management IPM in APM practice.
There needs to be better enforcement of "Clean water - Clean Boats." Invasive plants and animals need to be prevented at the boat landings and during transport. Fines for violators need to be increased. Information from post treatments need to be compiled and made available to provide effectiveness of treatment data. Information on treatment concentration effectiveness and any resistance data needs to be available. All parties need to be educated if current practices are failing.

Collaboration- Alternative 8
Develop a separate APM permit and grant application form for APM activities in wetland and shoreline sites.
This alternative could ease the permitting process for applicants interested in controlling aquatic plants in wetland and shoreline settings. Department staff across programs have expressed concern that wetland invasive plant management can be difficult through the APM program. Revision of grant and permit application forms could make the program more inclusive of wetland plant management and improve relations and collaboration with public applicants and DNR staff involved in terrestrial plant management.
This alternative could improve the wetland plant management process in the state , especially if combined with Alternative 9 above (below)
There should be a distinction between shoreline and wetlands as they are not the same. A definition of shoreline would need to be clear..ie...how far out into the open

water would be included in shoreline settings? Shoreline rules should remain under current rules.

.

Collaboration Alternative 9 Revoke public notice and mapping requirements for APM permits for treating of individual or patches of non-native plants with herbicides in wetland areas larger than 10 acres.

All treatments should, at least, require public notice in social media, local news papers, public notice areas and site areas in the vicinity of water access.

Collaboration Alternative 10

Reduce APM permitting fees to make APM more affordable for permittees.

Permit fees should should be reduced and the cost of the permit should be the same for all applicants. With the current model local stakeholders doing all the work and establishing the need for management. The DNR has reduced it's role in managing APM on individual water bodies. Not sure that lowering the fee would increase staff workloads.

Collaboration Alternative 11

Reduce department reliance on limited-term employees (LTE) for implementation of the APM program or designate specific scenarios in which permanent staff should take on the work.

Good plan.

Collaboration Alternative 12

Request input from APM stakeholders at annual meetings on research questions of interest.

Good plan.

Collaboration Alternative 13

Create a new permanent position within the department to facilitate collaboration between the department and APM service providers.

The regional DNR APM staff are doing a great job of collaboration. It is best to have this localized. It would be far more beneficial to have someone on staff to evaluate the post treatment results and provide results from data, and further recommend future best practices and treatment recommendations to APM service providers and stakeholders

8.2. DepartmentResources and Workload

Resources and Workload Alternative 1

Increase the number of department APM staff.

Additional APM staff duties should focus on specific needs such as APM research based Aon post treatment data, establishing best practice,and education of results and best practice to APM staff, stakeholders, consultants application vendors. (Madison level staff person(s)).

Resources and Workload - Alternative 2
Create new DNR positions specializing in APM and AIS for each region of the state.
Need to understand what current regional staff responsibilities include. Our experience is that this staff is adequate.

Resources and Workload Alternative 3
Reduce regulation of APM in private ponds.
Good plan

Resources and Workload Alternative 4
Allow issuance of multi-year permits for chemical APMprojects in public water bodies, following the approval of an APM plan.
Great plan and would reduce efforts and workloads on all sides

Resources and Workload- Alternative 5
Increase permit exemptions and/or develop general permits
when the purpose of management agrees with the purpose of NR 107
Creating less paperwork and bureaucracy is always good. Producing less fees, would not necessarily be a byproduct of reduced regulations and bureaucracy. Producing less fees would not necessarily be a byproduct of reduced regulations.

Resources and Workload - Alternative 6
Increase APM permitting fees to support additional staff, efficiency, and collaboration.
Bad idea....the real work and responsibilities of water body management (except for the Great Lakes) has shifted to the land owners (Stakeholders). The resource belongs to the people of the state. Having the stakeholders be penalized more for doing the work that benefits all that use the resource is wrong. It will discourage needed work from being done as the costs of treatment of AIS is already high. Also, permitting fees should not be scaled to the size of the water body. The permit should be a tool used to confirm that the application is a proper one, and follows best practice as well as a marker for follow up data and post treatment evaluation .

Resources and Workload Alternative 7
Create a department assurance process for private aquatic plant managers and consultants similar to that used in wetland delineation
This is a good plan.

Resources and Workload Alternative 8
Partner with DATCP to develop a certification program specifically for APM in public waters.
ATCP pesticide licensing should be adequate enough not sure why you would need to add more bureaucracy. Any streamlining efforts are always good. Duplication of training, education and certification are not needed.

Resources and Workload Alternative 9
Develop online templates for use in APM planning.
Any method of simplification for permit applicants is encouraged. A template is a great idea if it is simple for non-lay persons to complete. Reducing work loads for all is always good.

Resources and Workload Alternative 10
Designate a specific annual time-window in which APM permits can be submitted and processed
Good plan.

8.3 Public Outreach and Communications

Outreach and Communication -Alternative 1
Develop an APM listserv and newsletter for sharing information between department APM staff, partners, and members of the public with an interest in APM.
This is a great idea...why not just do it! Don't understand why this would even be an item in this document...This is something that just should be happening.

Outreach and Communication Alternative 2
Host an annual meeting for sharing new APM-related information with the public.
This is a great idea...why not just do it! Don't understand why this would even be an item in this document...This is something that just should be happening.

Outreach and Communication Alternative 3
Dedicate DNR APM staff to periodically revising informational fact sheets and outreach materials with the latest information to keep messaging current.
This is a great idea...why not just do it! Don't understand why this would even be an item in this document...This is something that just should be happening. \

Outreach and Communication Alternative 4
Increase engagement of stakeholder groups and staff not directly involved in APM activities.
This is a great idea. Don't understand why this would even be an item in this document...This is something that just should be happening.

Outreach and Communication Alternative 5
Develop and conduct education and outreach related to
herbicide resistance management and IPM in APM.
This is a great idea...why not just do it! Don't understand why this would even be an item in this document...This is something that just should be happening.

Outreach and Communication Alternative 6
Develop and conduct education and outreach
related to different lake types and their expected respective aquatic plant communities
This is a great idea...why not just do it! Don't understand why this would even be an item in this document...This is something that just should be happening.

Outreach and Communication- Alternative 7
Develop and adopt consistent terminology for referring to different management goals and desired management outcomes.
This is a great idea...why not just do it! Don't understand why this would even be an item in this document...This is something that just should be happening.

Outreach and Communication Alternative 8
Following release of APM-related publications, develop and distribute specific suggestions for how findings should relate to management

This is a great idea...why not just do it! Don't understand why this would even be an item in this document...This is something that just should be happening.

8.4.Program Tracking and Evaluation

Program Evaluation Alternative 1
herbicide concentrations used when applicable. . Collect additional data on APM activities and incorporate those data into the DNR APM database, including (but not limited to) records of non-chemical methods, how much funding and time was spent, which species were targeted.
Much of this data is already out there including SWIMS and information in the permit application. Sounds like someone(s) are not doing what they should be doing. Also seems much of this effort again shifts to the stakeholder volunteers who have limited time to devote to gathering more information for the DNR. (MANY stakeholders are not permanent residents and not only do they have limited time on their waterfront, but they have no local voting rights). It is a good idea to have someone at the DNR to evaluate the data and offer best practice solutions combining databases.

Program Evaluation Alternative 2
Conduct a full economic analysis of APM in Wisconsin.
What would be the goal of the analysis? Really an extension of Alternative 1. This would probably be a total waste of time as much of the data would be speculation. There would just be too many things to consider in this type of an evaluation. This time could be better utilized elsewhere.

8.5 Integrating New Information

Information Integration Alternative 1
Increase funding and staff for evaluation of APM projects

Increased funding for AIS is needed. The approval process is highly competitive and many control projects are not funded. The burden is really on the stakeholders to manage the state resource and the DNR currently regulates compliance and funding. Regional DNR staff have been providing good service.

Information Integration Alternative 2
Increase contract based evaluation of APM projects.
In most cases stakeholders are not capable of knowing best practice solutions or application specifics. They highly rest on private consultants to offer solutions and assist with permit applications. Further funding for this activity would be good.

Information Integration - Alternative 3
Build a team-based approach to evaluating management efficacy and non-target effects.

Agreed good plan

Information Integration - Alternative 4
Develop a future-forward strategy for evaluating impacts of and management options for approaching AIS and other emerging issues
This would be considered good leadership.

Information Integration - Alternative 5
Require monitoring of aquatic plant communities on all water bodies where APM is conducted.
This is a requirement of the current permit approval process. Further funding would need to come from the DNR for further studies, as this would be a further burden to the stakeholders.

Information Integration - Alternative 6
Require herbicide concentration monitoring for aquatic herbicide treatments supported by department grant funding.
This is already included in the current permit and grant funding process.
Good idea.

Information Integration- Alternative 7
Conduct further evaluation of APM projects that utilize non chemical control techniques, combinations of non-chemical techniques, combinations of chemical and non-chemical techniques, combinations of chemical control techniques, and chemical control techniques with new modes of action and formulations.
Agreed good plan

Information Integration- Alternative 8
Not sure this monitoring would be valuable because there are so many variables in geography. Continue long-term monitoring of aquatic plant communities in
Lakes not being actively managed hic locations that would not apply generically. Would rather time be spent on lakes that care enough to have a management plan in place and have provided resources. This maybe helpful in order get a baseline on how unmanaged lakes are reacting to the AIS. This might help understand if management programs are working and cost effective.

8.6.Consistency in Evaluating Permit Applications

Consistency- Alternative 1
Define a strategic philosophy and direction for the department's APM program.
Sounds like this should have been done long ago! It needs to be done.

Consistency- Alternative 2
Standardize the specific aspects considered in the permit review process and the methods by which they are evaluated.
Agreed, also regional allocations need consideration to keep funding fair. The Great Lakes, need to be a separate discussion.

Consistency- Alternative 3
Use the points of consideration in Consistency Alternative 2 to create decision-making flowchart to support best management practices.
Sounds like this should have been done a long time ago! Good idea.

Consistency - Alternative 4
Increase training for department APM staff
Good plan

Consistency - Alternative 5
Increase training for county and regional AIS coordinators funded by DNR grants.
Good plan

Consistency - Alternative 6
Develop a working definition for the social and environmental conditions that warrant APM.
Good plan

Consistency - Alternative 7
Revise Wisconsin's APM administrative codes.
Good plan

8.7. Grants

Grants- Alternative 1
Increase the amount of department grant funding available for supporting APM projects statewide as well as county and regional APM and AIS staff and other members of Wisconsin's AIS partnership
Yes with the responsibilities shifted to the stakeholders it funding from the AIS grants is the only way that these projects will be completed and continued. The consequences of no action taken, is far reaching. Issues of water quality, animal habitat, economic impact, recreational impact and loss of property value, are among the top concerns.

Grants - Alternative 2
Divide department grant funding into different categories to support different types of APM projects.
Reducing grants on the criteria that certain groups routinely receive grants is not a good idea. Funding should be based on merit and the grant ranking criteria. Not sure of the impact of partitioning of department grant funding into several additional categories, each with different ranking criteria.

Grants- Alternative 3
Set clearer and more open criteria for ranking department grant applications.
Agree

Grants Alternative 4
Direct department grant funding to support a wider range of IPM approaches.
Agree and we would support grant funding that supports a wide range of IPM approaches backed with support and research for best practice. It is noted, that some members feel that mechanical harvesting is just cutting the plants and not solving the problem.

Grants Alternative 5
Increase the amount of time funding remains available for APM projects, once granted.
Yes this is a very good idea. As some long range plans evolve sometimes treatments can be delayed. As long as there is a management plan in place with the grant there should be some time leeway within reason.

Grants Alternative 6
Limit the amount of department funding that can be awarded to any one sponsor or the number of grants that any one sponsor can receive to conduct herbicide treatments over a certain time period.
Although sometimes it just does not seem fair, reducing grants on the criteria that certain groups routinely receive grants is not a good idea. Funding should be based on merit and the grant ranking criteria.

Grants - Alternative 7
Reduce or eliminate department grant funding for herbicide treatments for aquatic invasive plant populations that have become well-established in a given water body
We don't feel this is a good idea...this may also contribute to the spread of invasives to other lakes from this source.

Grants - Alternative 8
Reduce or eliminate department grant funding for APM herbicide treatments.
Reducing or eliminating funding would have a bad effect on the consequences as many of the lake groups have a lack of funding resources. The results of no funding would mean no action taken. This would be far reaching. Among the top concerns would be: issues of water quality, animal habitat, economic impact, recreational impact and loss of property value.

Grants - Alternative 9
Develop a strategy for APM and AIS management in Wisconsin that does not rely on department grant funding
When talking about Wisconsin's greatest asset,.it's waters. The state needs to take responsibility. Without funding this resource will slowly deteriorate and the consequences will be enormous. Funding must be increased not reduced. Ultimately this should be totally funded by the State since they are the owners of all waterways. This is the only way you will get consistent results statewide.

Grants – Alternative 10
When assessing grant applications, prioritize projects that take a watershed level approach and those that leverage the power of regional and local partnerships.
Agreed good plan.

8.8.Watershed Health, AIS Prevention, Enforcement, Overall Emphasis, and Other Topics

Other Topics- Alternative 1
Heighten emphasis on runoff issues and ecological stewardship in the department's APM program
Runoff issues are extremely important. With the advent of "mega farms", property developments, and road construction, something needs to be done. More work with the Department of Agriculture needs to happen.

Other Topics- Alternative 2
Develop a classification system for Wisconsin waterbodies to support management decision-making.
Agreed...also the definition of navigable waters needs to be revisited. The current definition is not even close to reality.

Other Topics - Alternative 3
Increase enforcement of movement of aquatic invasive plants between water bodies by citizens.
This plan needs to happen.

Other Topics- Alternative 4
Allocate more resources toward preventing introduction of non-native plants to water bodies with higher chances of negative ecological consequences of those non-native plant species.
This is a good plan but it is too late for many!

Other Topics - Alternative 5
Increase collaboration with and/or enforcement of industries which provide pathways for the spread of aquatic invasive plants
Good plan

Other Topics - Alternative 6
Repeal permit and certified applicator requirement for chemical control of non-native plants below the Ordinary High-Water Mark (OHWM) on exposed lake beds.
Good plan

Other Topics - Alternative 7
Repeal permit requirement for non-native plant removal at wetland or shoreline sites below a given water depth where the site is likely to dry out by the time control work is conducted.
Good plan

Other Topics- Alternative 8
Develop a set of guidelines for the bidding process for individual APM projects.
Guidelines for bidding are a good idea, but selection on “low bid” should not be used as the final factor in the selection process.

Other Topics Alternative 9
Increase regulation of APM in private ponds
Not sure this is important at this time. Increased regulation in this area is probably not a priority in the scope of these larger issues.

Other Topics Alternative 10
Require DASH equipment modification to prevent suction of bottom sediment.
It would be very difficult to eliminate suction of bottom sediment. The fact that they are removing plants by the roots would infer that some sediment would be sucked up. In the removal process the DASH people would not want to be moving more material other than the plants anyway. This is a great non-chemical and very selective procedure. It would be best to keep things as they are unless problems develop.

McCord, Ashleigh I - DNR

From: Steve Meidl [redacted]
Sent: Sunday, January 13, 2019 8:02 AM
To: DNR WQSS APMSA
Subject: Comments on WDNR Strategic analysis of APM

The following is our comments on the proposed changes for APM

Management Alternatives:
Support Alternative #13

Grants program:
Support Alternatives: 1,2,3,5,6
do not support Alternatives: 4,7,8,9,10

Steve Meidl
Pigeon Lake of Manitowoc County

McCord, Ashleigh I - DNR

From: Gus Nordholm [redacted]
Sent: Monday, January 14, 2019 4:52 PM
To: DNR WQSS APMSA; Eddie Heath; BillHoffman; Bill Brunner; Robert Nack
Subject: Strategic analysis of aquatic plant management in Wisconsin

I am a property owner on Roberts Lake and a member of the Roberts Lake Association. I was asked to give some comment on this analysis. We are currently dealing with Eurasian Water Millfoil so my comments are coming from that perspective.

My comments relate to the sections on Management Alternatives and Collaboration, and sections 8.6 and 8.7 of the document.

1) Study group? Don't they know what problems exist already?

2) I think a mentor could be good, especially for those of us not familiar with the process.

3) I believe in transparency, but yes this could invite trouble from some who just like to cause trouble.

4) NC

5) I agree with this. Knowledge is good.

6) Same thing, the more you know, the more you know.

7) NC

8) I agree with this. Wetlands are super important! Not just a swamp you can't build on. We are loosing wetlands at an alarming rate.

9) NC

10) NC

11) NC

12) Sounds good.

13) NC

8.6 Consistency in Permitting

1) Agree

2) Agree

3) Agree, visual aids are helpful.

4) Agree, regular training is important for new hires, etc.

5) NC

6) Yes, but keep invasives separate and give them top priority.

7) Agree, especially with policies for native and non-native plants.

8.7 Grants

1) Yes, more funding, but tax lake users? Who is that? Property owners, boat owners, swimmers?

2) Agree

3) NC

4) Agree

5) Agree, fighting a loosing battle? Especially native plants.

6) Agree

7) Agree

8) Agree, not a fan of herbicides in the lake.

9) Disagree, if not funded by the state then who? Plenty of money for Foxcon, there should be some money left to help our lakes.

10) Agree, the entire watershed need to be considered. It's all connected.

McCord, Ashleigh I - DNR

From: Nordin, Brenda L - DNR
Sent: Tuesday, January 8, 2019 8:47 AM
To: DNR WQSS APMSA
Subject: Comment on Grant section

A lot of funding seems to be directed to milfoil control, with mediocre results. An additional alternative to consider may be to include a loan option. First time applicants could go through the traditional grant, but then after that, the loan option would be the only alternative. This would ensure that the applicants have onus in the project and will not spend state money on control techniques that are not working.

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Brenda Nordin
Lake Biologist – WatershedBureau/Water Resources
Wisconsin Department of Natural Resources
647 Lakeland Road Shawano, WI 54166
Phone: 920-360-3167
Brenda.Nordin@wi.gov

dnr.wi.gov

McCord, Ashleigh I - DNR

From: Nordin, Brenda L - DNR
Sent: Monday, December 17, 2018 10:50 AM
To: DNR WQSS APMSA
Subject: Comments for APM SA

Hi, it was recommended by Law Enforcement that it would be good to have a note that compliance with permitting requirements and grant requirements is a priority. This would be to ensure no adverse effects to the environment are occurring. Enforcement is the foundation of any good program, without proper enforcement built in, the programs doesn't have a leg to stand on. It was also recommended by LE that this to do program attorneys for review.

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Brenda Nordin
Lake Biologist – WatershedBureau/Water Resources
Wisconsin Department of Natural Resources
647 Lakeland Road Shawano, WI 54166
Phone: 920-360-3167
Brenda.Nordin@wi.gov

dnr.wi.gov

McCord, Ashleigh I - DNR

From: Nycz, David [redacted]
Sent: Monday, January 14, 2019 9:02 PM
To: DNR WQSS APMSA
Subject: WDNR strategic analysis of Aquatic Plant Management - comments

To whom it may concern,

I have recently obtained a copy of the Strategic Analysis of Aquatic Plant Management document. I have read it over, and would like to provide some feedback for your consideration. Because of the length of the document (303 pages), it isn't realistic or practical for me to comment on every detail. However, I do have some thoughts about Chapter 8 which discusses the Management Alternatives.

Specifically, my thoughts come from Chapter 8.7 (page 87, PDF page 116) which discusses alternatives to the grant program, including a number of alternatives that would reduce or eliminate department grant funding for APM herbicide treatments. My response is based on my experiences in dealing with the DNR and grants, and the lake management activities that I've been involved with via the Lake Nokomis Concerned Citizens (LNCC) and the Lake Nokomis Lake District (LNLD) since 2004.

Grants- Alternative 6 – I don't support this alternative. Abandoning projects because a lake organization has met a maximum funding limit places a higher degree of risk that AIS infestation will return to levels where they were in prior years. Lake organizations should be given additional consideration/continued support if they are active in controlling AIS, and have documented success of their efforts.

Grants- Alternative 7- I don't support this alternative. It seems that the DNR is looking for ways to reduce herbicide treatments, which in my opinion, has been the only effective means to control large scale AIS infestation- specifically EWM in Lake Nokomis. Lake organizations that are in tuned to the AIS control methods know that mechanical harvesting, or hand pulling, is not effective and they will eventually abandon lake management projects completely if only given those options. This creates the likelihood that AIS will increase- not only in that particular water body, but also to other bodies of water. It's a risk that the State of Wisconsin should not take.

Grants- Alternative 8 – Similar response to Alternative 7 above.

Grants – Alternative 9 – I'd support a joint funding program for supporting APM and AIS management between the State and other sources. However, as indicated, state law requires the protection of aquatic plant control communities and preserving waterbody access. The state cannot abandon this completely.

I would also add to this that another alternative that should be considered is that **the State of Wisconsin should do more to encourage and support the formation of Lake Districts**. The process to form a Lake District is not an easy undertaking. If there were more Lake Districts, funding for lake management plans would become much easier.

Respectfully submitted,

David Nycz
LNCC President
LNLD AIS Committee Chair

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This footnote also confirms that this email message has been swept by Proofpoint Enterprise for the presence of computer viruses.

McCord, Ashleigh I - DNR

From: Erik Olsen [redacted]
Sent: Friday, January 25, 2019 9:31 AM
To: DNR WQSS APMSA
Subject: Comments on WDNR strategic analysis of Aquatic Plant Management in Wisconsin

7.4. Implications of Recent Findings on Herbicide Use in Aquatic Environments
We should be avoiding generalities. 10 acres defining large scale treatment depends on the total acreage of lake. Also consider biomass/impairment reduction of AIS instead of just frequency of occurrence when deciding if a treatment was successful or not. We have not had many small scale treatment failures using systemic herbicides, which is contrary to what is stated or implied in this section.

8.1. Collaboration

Collaboration - Alternative 1. Create an APM Study Group for communication and collaboration with stakeholders on the direction of APM policy in the state.
This is a good idea as long as it includes representation from the industry.

Collaboration - Alternative 3. Establish a more public and open process around APM activities and decision-making during the APM permitting process.
This is not necessary. The option for public meeting has been around for a long time, and there has only been enough interest about 5 times since 1989. Implementing something that may increase the length of time of the lake permitting process is not a good direction to follow.

Collaboration - Alternative 7. Implement strategies to support further adoption of Integrated Pest Management (IPM) in APM practice.
While implementing IPM is important, forcing certain methods to be used when they don't have a chance of being very effective is not a good idea. For example, mandating that DASH be used on acres of EWM.

Collaboration - Alternative 10. Reduce APM permitting fees to make APM more affordable for permittees.
The current APM fees are not the issue with people choosing to treat legally or illegally. The usual reason people choose not to treat is "we don't want the DNR in my backyard".

Collaboration – Alternative 11. Reduce department reliance on limited-term employees (LTE) for implementation of the APM program or designate specific scenarios in which permanent staff should take on the work.
Yes, the LTE employees often have little to no experience in interpreting the code. Either finding a way to retain them longer term, or shift it to permanent staff would be helpful.

Collaboration – Alternative 12. Request input from APM stakeholders at annual meetings on research questions of interest.
This would be helpful in cooperation from the industry side of things. Partial cost sharing would likely be available from various industry groups in regards to research projects, etc.

Collaboration – Alternative 13. Create a new permanent position within the department to facilitate collaboration between the department and APM service providers.
A full time person that is in our water management region would be the best choice for communicating with us.

8.2. Department Resources and Workload

Resources and Workload - Alternative 1. **Increase the number of department APM staff.**
An increase in APM staff may not help to decrease workload because some of the increase in workload can be contributed to the decisions made by some of the current full time staff such as:

1. Changing policies during the busy time of the year. This causes unnecessary friction and headaches to everyone involved
2. Waiting until the last moment (day 14 or 15) to review a permit. This causes unnecessary friction and stress between APM staff, applicators, and other stake holders.
3. If a lack of equipment (trucks and boats) prevents APM staff from completing directed supervision, we should not have to halt our own schedules

Resources and Workload - Alternative 2. **Create new DNR positions specializing in APM and AIS for each region of the state.**
This specialization would decrease workload and increase efficiency since the current lake biologists are already spending a lot of time supervising current APM staff

Resources and Workload - Alternative 3. **Reduce regulation of APM in private ponds.**
A multiyear permit would decrease the amount of work for everyone. Small ponds don't change much form year to year, thus the management doesn't change much from year to year. If multiyear permits are implemented, reporting requirements should be kept the same and an easier option needs to be added so that new products can be added to the permit as they come available.

Resources and Workload - Alternative 4. **Allow issuance of multi-year permits for chemical APM projects in public waterbodies, following the approval of an APM plan.**
As long as permit fees and requirements are updated and oversite continues during the duration of the permit, treatments would be conducted in an ecologically responsible manner as well as in accordance to the product label.

Resources and Workload - Alternative 5. **Increase permit exemptions and/or develop general permits when the purpose of management agrees with the purpose of NR 107.**
Keep exemptions to a minimum. Most public treatments are for the control of aquatic invasive species. This already meets the requirements of NR107.

Resources and Workload - Alternative 6. **Increase APM permitting fees to support additional staff, efficiency, and collaboration.**
An increase in fees to support more staff does not mean there will be an increase in efficiency and collaboration. See notes listed in 8.2 alternative 1.

Resources and Workload - Alternative 8. **Partner with DATCP to develop a certification program specifically for APM in public waters.**
This is unnecessary. The label is the law and will always be followed when conducting pesticide treatments. In addition, there would likely be little difference between the current aquatic pesticide certification and this newly created class.

Resources and Workload – Alternative 10. **Designate a specific annual time-window in which APM permits can be submitted and processed.**
Limiting the application time for permits would only create friction between APM staff and applicators/stakeholders. Many permits arise every year during the treatment season by people who want weeds and algae take care off for a specific event or time during the year, or who have a sudden, previously un-encountered problem. Forcing them to adhere to a strict permit application window will only alienate these people and encourage illegal treatments without DNR oversite.

8.3. Public Outreach and Communications

Outreach and Communication - Alternative 3. **Dedicate DNR APM staff to periodically revising informational factsheets and outreach materials with the latest information to keep messaging current.**

Industry should be involved in this process. We can help contribute to new APM discoveries and practices as well as help to disseminate information on best management practices.

8.5 Integrating New Information

Information Integration - Alternative 2. **Increase contract-based evaluation of APM projects.**

This is a great opportunity to include experts from every area, however, any APM project contracts must be thoroughly screened for any potential conflicts of interest. Some great organizations to pair with could be AERF (Aquatic Ecosystem Restoration Foundation), MAPMS (Midwest Aquatic Plant Management Society), and other academic institutions.

Information Integration - Alternative 4. **Develop a future-forward strategy for evaluating impacts of and management options for approaching AIS and other emerging issues**.

APM policies should always adapt to changing environments. The DNR has already taken a great first step in allowing treatments later in the summer and extending pond treatment dates until Nov 1st. This shows the DNR understands all aquatic ecosystems are affected by the ever changing climate and are willing to work with all stakeholders to find a balanced approach that works for the ecosystem and all parties involved.

Alternative 5. Require monitoring of aquatic plant communities on all waterbodies where APM is conducted
- This potential requirement is a non-starter. Elevating monitoring beyond grant funded treatments to all applications would be a huge strain on both the departments limited personnel as well as contractors and financial resources of the lake districts and property owners.

Alternative 6: Require herbicide concentration monitoring for aquatic herbicide treatments supported by department grant funding.
- Yes and we believe it already is required.

8.6. Consistency in Evaluating Permit Applications
Alternative 2. Standardize the specific aspects considered in the permit review process and the methods by which they are evaluated.
- Standardization does not take into consideration the variables of the resource. One size does not fit all.

Alternative 6. Develop a working definition for the social and environmental conditions that warrant APM
- Best defined by a locally funded aquatic lake management plan. Again a one size fits all approach isn't acceptable.

8.8 **Watershed Health, AIS Prevention, Enforcement, Overall Emphasis, and Other Topics**

Alternative 2. Develop a classification system for Wisconsin waterbodies to support management decision-making.
- Use the eco region classification for evaluating EWM control.

Alternative 4. Allocate more resources toward preventing introduction of non-native plants to waterbodies with higher chances of negative ecological consequences of those non-native plant species.
- The DNR should have the authority to close boat launches on waterbodies that contain "new" invasive species(i.e. hydrilla and starry stonewort)

Alternative 5. Increase collaboration with and/or enforcement of industries which provide pathways for the spread of aquatic invasive plants
- Yes. Monitor those such as pier installers and shoreline remediation work that utilizes boats/barges coming from other areas and waters.

Alternative 9. Increase regulation of APM in private ponds.

- Absolutely not. This will only increase the opportunity for conflict between pond owners, contractors and DNR staff. DNR staff time is already very limited and pond owners already want less regulation and increasing will only embolden a negative perception of the department.

This communication and its attachments, if any, may contain confidential and privileged information the use of which by other persons or entities than the intended recipient is prohibited. If you receive this transmission in error, please contact the sender immediately and delete the material from your system.

McCord, Ashleigh I - DNR

From: [redacted]
Sent: Tuesday, January 15, 2019 2:38 PM
To: DNR WQSS APMSA
Cc: [redacted]
Subject: Draft Comments

Carroll,
I looked at the draft and found it very comprehensive. I have a few comments on a very complex document. They may extend over several Chapters of the draft.

Streamlining the permit process by improving the forms to fit the review and data gathering needs would be helpful. Permitting fee increases for more staff seems like it will have problems. Streamlining the permit review and approval process seems more productive. A general permit for private ponds is a great step. Some of the permitting should be three year permits.

The monitoring should have goals, be uniform, and be measurable. Citizen Monitors are free labor and could be used for some of this effort.

I see little information on what is happening on overseas lakes where these invasives originated. Maybe some study should be done to see what is controlling the plants in their native habitat. It would be a start in understanding the long term effect of the plant in lakes.

I also have heard of EWM showing significant reduction in some lakes. Is there some natural condition affecting this? If a lake experiences an unexpected die-off, there should be some research on the cause.

<u>Cedar Lake Observations that relate to the draft contents:</u>

My initial observations of the AIS on Cedar Lake in Manitowoc County indicate that the eradication efforts have been somewhat successful and worth the effort. These observations are that the lake has increased "slowly" in its concentration of EWM. The best spent money was in initial eradication of it as soon as it is found. The second best money is in poisoning the outcrops as they are found on the lake. This might require an as-needed permit that would also include some monitoring, location data, etc. A combination DASH and poisoning grant should go hand in hand at least for what we experienced on Cedar Lake.

Mary Gansberg has been very responsive in providing us with technical guidance and meeting our timely permitting needs.

I hope that these comments help and let me know if I can be of further assistance.

Sincerely,
Scott Otterson, PE
Commissioner
Sanitary District 1 Cedar Lake

McCord, Ashleigh I - DNR

From: Propson, Ryan M - DNR
Sent: Wednesday, January 2, 2019 2:36 PM
To: DNR WQSS APMSA
Subject: APM Strategic Analysis Comments

Hello Carroll,

The draft APM Strategic Analysis was forwarded to me by Marsha Burzynski and Brenda Nordin [redacted]. After briefly reviewing the Strategic Analysis, I feel that the document/program could benefit from a brief mention of compliance/enforcement to ensure that permit conditions and grant requirement are being followed. In addition, compliance/enforcement is important to ensure harm isn't done to the environment, people, or animals due to a treatment/harvest and also to ensure that the invasive plants being addressed aren't spread to further waterbodies. Lastly, it's important that enforcement be included to ensure proper, legitimate, and wise use of State grant dollars associated with APM work.

Thanks,

Ryan

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Ryan Propson
Investigative Warden – Bureau of Law Enforcement
Wisconsin Department of Natural Resources
625 E. Cty. Rd. Y, Ste. 700
Oshkosh, WI 54901
Phone: (920) 312-1268
Fax: 920-424-4404
ryan.propson@wi.gov

dnr.wi.gov

McCord, Ashleigh I - DNR

From: Jerry Ray [redacted]
Sent: Tuesday, January 15, 2019 5:31 PM
To: DNR WQSS APMSA
Subject: Invasives etc.

Greetings,
As someone who sold aquatic plants in the 80s and have wetland and natural ponds in Brown county I offer the following;

Don't know if phragmites problem is or will ever be solved , but when possible I think massive plantings of native cattails is in order.
Retention ponds should never be allowed to degrade into phragmites or other failures.
Most people have no clue what phragmites is or does.
In my experience purple loosestrife is easy to control .
Please hold the line on creeping north with these things.
I know , money is most likely a limiting factor in much of this. But , is there a phragmites czar on staff or available ?
In studying constructed wetland septics for years I see the great benefits of Typha. W Virginia Univ. seems to lead in that study.
My thoughrts, thank you,
Jerry Ray

Sent from Mail for Windows 10

Virus-free. www.avast.com

McCord, Ashleigh I - DNR

From: Rob Richardson [redacted]
Sent: Monday, December 17, 2018 10:54 AM
To: DNR WQSS APMSA
Subject: Aquatic Plant comment submission

In our opinion there needs to be more flexibility in aquatic plant management for lakes that are being chocked by native as well as invasive aquatic plants. There seems to be a fair amount of ability to manage invasive aquatic plants but the in cases like Lake Iola, the lake is being choked by invasive species as well as what are considered native aquatic plants. The draw down a few years ago was supposed to address the issue but both native and invasive aquatic plants are more of a problem than before the draw down. Some people on the lake (including ourselves) are selling their boats because their motors are being choked by the aquatic plants shortly after leaving the dock. It is not an enjoyable lake for boating - which is why we bought land on this lake.

Please consider this a request for some ability for local lake districts to manage both invasive and native aquatic plants when the lakes are being overwhelmed by both types of plants.

Rob and Susan Richardson
[redacted]
Iola WI

McCord, Ashleigh I - DNR

From: [redacted]
Sent: Friday, January 25, 2019 1:05 PM
To: DNR WQSS APMSA
Cc: [redacted]

Subject: Comments on APM Strategic Analysis

To whom it may concern, I wanted to add a few comment as part of the APM Strategic Analysis review. It certainly is a comprehensive document. I was pleased to see many of the concerns that have been raised on a number of subjects acknowledged. The two areas I wanted to add comments to are the Grant Programs and AIS Management:

Grant Programs
Regarding grants, it's clear that the grant programs are becoming more and more competitive to the point that a straight-forward lake management plan update or AIS control project has little chance of getting funded. During the most recent Lake Planning Grant round, our lake clients were looking to develop a management plan with the usual components (aquatic plants, water quality, watershed, habitat, etc.). It was recommended to them that the project be expanded to include more detailed watershed modeling or shoreline improvement activities, etc. These suggesting were intended to help them rank higher. However, these were the sort of second stage research elements that a management plan may direct you toward. So, in order to rank high enough to receive grant funding, these above and beyond elements are becoming more and more necessary to compete against the pool of other proposals. Which in the end costs the lake organization more money to complete. Often a plan is already an expensive precursor to the costly management activities they are trying to execute. They shouldn't have to take on more work and spend more money unnecessarily to rank high enough to compete. No funding available for straight forward AMP plans.

AIS Management
I can understand that in some cases AIS don't become problematic and the Strategic Analysis addresses this. We work with a number of lakes that previously had widespread AIS, which, at the time led to navigational and ecological impacts. In many cases, we were initially able to get the distribution of AIS to below nuisance levels and through careful, targeted management have maintained these levels for many years. We may not make great strides in further reducing the total acres of AIS, but much of that is likely due to the scale of the treatment or any number of factors.

We all know eradication is not a realistic goal. In many of these cases, *AIS maintenance at low occurrence* is the goal. This approach greatly minimizes the risk of the managed population spreading throughout a lake or to other lakes. In addition, there is always the threat of reintroduction, viable turions, seeds, etc. When we reach this level, we are using minimal amounts of herbicide at a relatively low cost to the lake. Recently, some in the DNR have said "spot treatments don't work" and have denied treatment. This is short-sighted. This isn't a case of doing the same thing and expecting different results, it's about maintaining low levels and minimizing impacts to native species. We have had a number of cases in the past few years, where management has stalled or switched to manual removal or mechanical harvesting. Within as short a time as a year, we have seen AIS populations return to large-scale, lake-wide distributions; losing much of the progress gained by over a decade of management costing tens of thousands of dollars.

In recent years, we have hears more and more that "AIS can exist at low levels and don't necessarily become a problem". I understand this is the case in some lakes. However, many of the lakes we are managing once had problematic AIS levels. Taking a year or two off and waiting to see what happens is not something most lake groups want to do, particularly when they reflect on conditions of the lakes prior to AIS management. These lake groups see these small-scale maintenance treatments as a sort of insurance policy against returning to large-scale distribution, reduced use of the lake and high management costs. When the DNR suggests or insists on ceasing chemical treatment

and the AIS gets out of control again, there isn't a check from the State waiting for them. Yes, these lakes can apply for AIS grant funding, but they are the least likely projects to get funding. Treatment were denied because they were believe to be not effective enough. The same agency isn't going to put money back into the same approach.

As an aside, we have to acknowledge the scale at which manual removal is effective (from hand-pulling to DASH). Even lakes with very small areas of AIS struggle annually to keep up. We have seen lakes spend thousands of dollars building DASH units and/or hiring divers just to end up losing ground on the milfoil infestation. Yes, it's one of the tools in the toolbox, but it's been touted as the next big thing without acknowledging its limitations at the expense of the lake residents. We saw this same thing happen with milfoil weevils ten years ago.

One other note, I was interview in the spring of 2017 by Chelsey Blanke about APM, but I don't see my location on the stakeholders' map or recognize my comments in the appendices. Curious.

Thank you for your time.

Sincerely,

Brad Roost, Limnologist
Accredited Lake Management Professional

Cason
& ASSOCIATES, LLC
LAKE & POND MANAGERS

[redacted]
Berlin, WI 54923-0230

[redacted]

McCord, Ashleigh I - DNR

From: C Sampson [redacted]
Sent: Wednesday, January 23, 2019 8:04 PM
To: DNR WQSS APMSA
Cc: [redacted]
Subject: Cloverleaf Lakes response to DNR's strategic APM analysis

Members of the DNR Aquatic Plant Management strategic analysis team,

At the Cloverleaf Lakes Protective Association in Shawano County, we have some concerns and questions about the DNR's Strategic Analysis of Aquatic Plant Management, and whether policies that arise from this project will in fact be counterproductive on waterways such as ours.

Personally, I fear that a one-size-fits-all approach to invasive management would fail to recognize that in some important ways, our chain is an outlier.

For example, I know that chemical herbicide treatment has fallen out of favor with some other lake associations and districts. When I participated in last year's Lake Leaders seminars and the state lakes convention, it was striking to me how many of my counterparts from other lakes seemed surprised when I told them the positive results we have enjoyed, that halfway through our latest cycle we're hopeful of achieving a full five years before another round might be necessary. More than a few told me that on their lakes, the chemical treatments achieved only partial eradication, or that the milfoil came back strong after only a year or two, or that local concerns about costs, potential damage to native plants, or general opposition to herbicides convinced them to try something else. Most of these counterparts told me we should "feel lucky" that on the Cloverleafs, we're staying a little farther ahead.

I don't know about "lucky." I suspect that water quality and chemistry, the relatively small size of our three lakes (250 or so acres spread out among three channel-connected water bodies), water depth, generally good health and species diversity, etc. – or maybe we just had favorable weather when treatments were applied – all contributed to the good results. And they have been good. Surveys taken in 2018 (a full two years after Fluridone treatment) showed almost no milfoil in the largest and most heavily used lake on our chain, Pine Lake. In adjacent Grass Lake, a day or two of hand-harvesting knocked back the relatively limited colonies there. And the best news might be that a point-intercept analysis of our beneficial native plant populations shows little or no collateral damage to those species.

(As an aside, we have solid property owner and lake user support for our efforts. Roughly two-thirds of our 300 lakeshore homes are members of the CLPA and, of those, many go beyond the nominal $25/year dues and donate tens and even hundreds of dollars to our association's anti-AIS reserve fund.)

Anyway, when I read those portions of the Strategic Analysis that seem to pertain most directly to the Cloverleafs (Chapter 8)… or more accurately, when I read between the lines… it seems the desire for more "consistency" and more universal application of the rules, although certainly beneficial and necessary statewide, could be a step backward for success stories such as ours.

Therefore, we ask that **any new policies make realistic allowances to grant exemptions, waivers and alternative management plans for those waterways where experience shows a different approach might yield the same or better results.**

Stated another way, the Cloverleaf Lakes Protective Association, in cooperation with our private consultants and local and regional DNR experts, would like to retain the ability to have local input on treatment or removal options, application or harvest cycles, chemical selections and the like, to best match local conditions. Wisconsin has many nutrient-rich, agriculture-basin lakes in the South, and many deep, clear and forested lakes in the north. The Cloverleaf Lakes are pretty much in the middle, figuratively and literally. Standardization of practices and policies, if done with too broad of a stroke, might not serve us well.

Our second primary concern involves eligibility for DNR invasive-species grants. If I read the Analysis correctly, there is a suggestion that some sort of "lifetime cap" be applied to limit repeat awards to the same lake association.

The Cloverleaf Lakes Protective Association disagrees. We acknowledge that first-time applications might deserve some degree of special consideration but, again, a one-size-fits-all policy ignores that a repeat award or renewal of an existing grant might be the better use of scarce resources.

A not-so-hypothetical example involving two potential grant recipients: One is a first-time application from a 10-member association on a small, out-of-the way lake in a county of 500 or 1,000 lakes, and the other is, say, a lake just like the Cloverleafs.

The second lake would have 300 lakefront properties on 250 acres of full-recreation water. A busy boat landing allows many more users from the nearby small towns to enjoy swimming and tubing and skiing on summer weekends. Fishing pressure is heavy. In fact, bass and muskie fishing is typically so good that local clubs target the waters for tournaments. As a Class A muskie lake within 45 minutes of Appleton and Green Bay, it's a popular after-work destination. As small, protected water when bigger lakes like Shawano and Winnebago are too windy, it's popular that way, too. It has an effective and long-established lake association (since 1936) with active volunteers and a history of collaborating with the DNR and local officials. Economic impact isn't everything, of course, but the lakefront homes account for most of the property taxes paid in the otherwise rural township.

Just as important, the second water body (OK, it's the Cloverleafs) presents a much more significant risk for spreading AIS because of the relatively heavy use by outside boaters and fishermen. It's not uncommon for boaters to hit another nearby lake soon after visiting the Cloverleafs. The risk of AIS expanding its range is high. It is fortunate that the Cloverleafs, with DNR assistance through grants, has been fairly successful in limiting milfoil colonies. We also have a robust "Clean Boats" monitoring station at our boat launch during the busiest summer months.

Considering all the factors listed above, then, we believe the case is easily made that in some instances a repeat grant to a previous recipient – an association in a higher-risk location that has proven itself to be an effective steward of past grants – might be the highest and best use of taxpayer-supported funding.

We ask then, that receipt of previous AIS grants not be a disqualifying factor when the DNR determines which lakes should receive that year's grants. Each year's applicants should be judged on their current merits.

The comments offered here are in my own words. However, my fellow board members and I discussed the Strategic Analysis at our January CLPA board meeting and there was consensus that we would like the DNR to carefully address the two main issues identified here: individualized management approaches for lakes that don't fit neatly into cookie-cutter templates, and any prohibition or reduction in repeat AIS-fighting grants.

Thank you for consideration of these concerns,

Christopher Sampson
co-president (with Jessica Meier) of the Cloverleaf Lakes Protective Association
Clintonville, Wis.

[redacted]

McCord, Ashleigh I - DNR

From: Jim Scharl [redacted]
Sent: Monday, January 28, 2019 8:32 AM
To: DNR WQSS APMSA; Schaal, Carroll - DNR
Subject: Re: Draft APM Strategic analysis comments

Good morning,

Just checking in to make sure these comments were relieved. I had them ready to go in my outbox, just momentarily blanked on the timeframe. Also, one additional comment if I may:

Push back the permit expiration date to Oct. 31 or later for ALL permits. This is especially important for private ponds, corporate ponds, or stormwater ponds etc. that are managed for aesthetics. The growing season does not end or coincide with the current expiration date, even in the extended southeastern counties. Many often have nuisance plant/algae growth after the current expiration date & limit our ability to properly manage them.

Regards,

Jim

On Sat, Jan 26, 2019 at 10:28 AM Jim Scharl [redacted] wrote:

Carroll.

Thank you for the opportunity to review the draft. Attached, please find comments regarding the analysis.

Regards,

Jim

--

James Scharl
Senior Biologist - Lake Services Manager

[redacted]

--

James Scharl

Senior Biologist - Lake Services Manager

[redacted]

To help protect your privacy, Microsoft Office prevented automatic download of this picture from the Internet.

General Comments:

- Private ponds with >1 owner and no public access should not be under the public permit process. This includes many stormwater ponds.
    - Page 64: Resources & Workload – Alternative 3.
        - Keep requirements for treatment records
        - Synthetically lined ponds should, in general, be exempt for NHI influences
- Allow multi-year permits for private ponds & stormwater ponds
- Move alum permits from NR109 to NR107 permits.
- Change requirements for large-scale permit (NR107) from 10% or 10 ac of littoral zone to 20% or 20ac or stop requiring large-scale permits altogether
- Dis-allow surface water grants for wetlands (phragmites) where >33% of the work occurs on private property
- Move surface-water grant deadlines for AIS control projects to December – Feb. deadline allows for little turnaround time for bidding, etc.
- Require all surface-water grants for AIS control projects to be out for public bid for the control aspect (application, mechanical, etc)– either prior to or after application.
- Require all individuals/companies to be certified applicators if they create AIS management plans that include specific herbicide applications (i.e. outline products, application area, dose, & rates).
    - Page 59 – Collaboration – Alternative 6: From my perspective there have been multiple projects where myself, as a certified applicator, are bound to applying a specific plan (active ingredient, location, & rate) exactly as specified by a non-certified third-party entity. There have been multiple times where the specified application would have resulted in above legal label rates. If not caught before hand all liability would fall on the applicator. This leaves the third-party entity held blameless when they are the ones specifying and directing the application.
    - It would NOT increase workload for private consultants. They are already directing specific application plans, they would just need to pass the DATCP exam.
- Remove all after-the-fact requirements on NR107 permits. i.e. – many permits when received have additional requirements, such as plant surveys, water monitoring, and others, that were not discussed prior to approval and would be a financial burden on the client.
- Change grant program to fund more lakes for AIS management – similar to Minnesota on a per-acre basis. There must be some semblance of a plan to apply (possibly a form – again similar to Minnesota).
    - Page 66: Resources & Workload Alternative 9: Template for APM is similar to what Minnesota requires to apply for AIS grants.
- Current grant program scoring is too favorable to large lake districts that may not be in as great a financial need. Lakes are important to the riparian owners and small lake associations without taxing authority and limited membership need more financial assistance than large lake Districts with a broad tax base (such as the Eagle River Chain)
- Page 60: Collaboration – Alternative 8: Agree in creating separate plan for wetland permits and grants. However, as above, projects that take place where >33% of the work occurs on private lands should not be grant fundable.
    - Wetland lines are ambiguous & target species often creep into upland areas. What would be the dividing line for how much of the target areas are actual wetland? Go off WWI data? Is a wetland delineation necessary prior to permitting? Many applicators when applying do not have the knowledge and/or experience to accurately assess wetland lines.
- Page 60: Collaboration – Alternative 9: Agree. See above comment on deciding how much of the proposed are is actual wetland.
- Page 61: Collaboration – Alternative 10: Disagree. Rates should be raised for public permits.
    - Page 65: Resources & Workload – Alternative 6: Agree
- Page 65: Resources & Workload – Alternative 7. Agree on requiring an assurance program. Especially important for aquatic plant ID and those who complete point-intercept surveys.

- Page 66: Resources & Workload – Alternative 8: Agree on DATCP certification for APM in public waters. Part of the process must include past history of fines or non-compliance – those with too many negatives cannot be certified. Limit certification to employees of Wisconsin based companies only.
- Page 78: Information Integration – Alternative 5: No. Who is going to fund the monitoring? Would push cost on to customers. This is not necessary on many private ponds or stormwater ponds. Many private ponds – especially synthetically lined ponds - are specifically managed for swimming.
- Page 78: Information Integration – Alternative 6: NO. Funding would be pushed to lake groups. Many funded projects would likely use 2,4-D which has a large database already. Would this add anything new to 2,4-D information? (not likely)
- Page 79: Information Integration – Alternative 8: Agree – monitoring on unmanaged lakes would be usefull. Who would complete the surveys & how would it be funded? Suggest opening up the work to private consultants through a specific grant program. All applicants must be aquatic plant ID certified.
- Page 82: 8.6 – Consistency in Evaluating Permit Applications
    - General comment on the entire section that this is needed. Too much variance between department staff.
- Page 82: Consistency – Alternative 2: Caution that standardizing the specific aspects could be too narrow of a focus – must be split between public waters & private waters.
- Page 87: Grants – general comment: Grant program has become excessively competitive, which causes applicants to increase their project scope to acquire more points, which increases grant request & decreased overall number of grant awards. Overall, the grant program has become bloated because of this.
- Page 87: Grants – Alternative 2: Agree on dividing it. What would be the issue if funding for groups who routinely receive grants becomes reduced? Spreading the money to more, or less affluent, groups is better.
- Page 88: Grants – Alternative 6: Agree – many grant applicants have received multiple grant awards. This is more important for applicants – especially districts – with a large member/taxing base for current budget.
- Page 89: Grants – Alternative 7: Disagree to an extent. Base on past history of management.
- Page 89: Grants – Alternative 8: Disagree. The largest populations of AIS often require herbicide treatments because it is the most cost effective on a per-acre basis. This action would dramatically increase the grant request per project.
- Page 95: Other topics – Alternative 3: Agree – the rules are already on the books. Increased enforcement is necessary.
- Page 95: Other topics – Alternative 4: Caution against requirements that would limit public use of the waterways. Any action should not result in closing (temporary or permanent) or limiting public access points – including limiting access only to when an inspector is present. This can be a dangerous precedent!!!
- Page 95: Other topics – Alternative 5: Agree. Many nurseries, etc. have readily available plant species that are prohibited in WI.
- Page 96: Other topics – Alternative 6: Disagree. Dried out does not mean the site is not a wetland. Aquatic herbicides should still be used.
- Page 96: Other topics – Alternative 8: Agree for grant funded projects – make bid request public for grant-funded projects
- Page 96: Other topics – Alternative 9: **Strongly disagree.** There is already too much regulation for APM in private ponds. Many private ponds were created for & heavily managed for use other than fish & wildlife. This is especially true for synthetically lined ponds.

McCord, Ashleigh I - DNR

From: Jim Scharl [redacted]
Sent: Saturday, January 26, 2019 10:28 AM
To: DNR WQSS APMSA; Schaal, Carroll - DNR
Subject: Draft APM Strategic analysis comments
Attachments: APMSA_draft_comments_WLPR.docx

Carroll.

Thank you for the opportunity to review the draft. Attached, please find comments regarding the analysis.

Regards,

Jim

--

James Scharl
Senior Biologist - Lake Services Manager

[redacted]

Wisconsin Lake & Pond Resource LLC
"Providing Professional Resources for Management of Your Lake or Pond"

McCord, Ashleigh I - DNR

From: Floyd Schmidt [redacted]
Sent: Friday, January 25, 2019 9:41 PM
To: DNR WQSS APMSA
Cc: Floyd Schmidt
Subject: APM Strategic
Attachments: APM Strategic 2019.docx

Dear Study Group,

Thank you for allowing us to review the plan. I have a few comments on chapter 8-6&7.
They are attached.

Sincerely,

Floyd Schmidt
CLPRD

Aquatic Plant Management: Draft Strategic Analysis

Comments by Floyd Schmidt, Chute Lake P & R District board chairperson (Chute Pond, Oconto County)

8.6. Consistency in Evaluating Permit Applications

8-6.1 – Defining a strategic philosophy and direction for the DNR's APM program should give everyone a better idea of what is expected. This may take some time and extra work for the persons involved to get set up.

8-6.2, 3 – Standardizing the APM permit and creating a decision-making flowchart may be possible but so few lakes are the same. The considerations for each lake would make a flowchart very complicated. One might be able to standardize some of the permit with expectations for different lakes to be stated in the rest of the process.

8-6.4 – Increasing training for DNR staff may help with the permit review; management and evaluating of APM permit requests. The DNR staff will not want to spend more time in training instead of getting projects completed. A Handbook may be helpful but with everything changing so rapidly it would be difficult to keep it updated.

8-6.5 – Increased training for county and regional AIS coordinators funded by DNR grants should give them a better idea of what is expected in a permit. They would be better able to potentially explain to stakeholders what is allowed and permitted.

8-6.6 – Developing a working definition for the social and environmental conditions that warrant APM will be very difficult because of all the different stakeholder expectations. It would need to be a statement that is consistent and transparent at the same time. A statement that would be clearer as to what activities are permissible for the stakeholders is a great idea.

8-6.7 – Revising the codes would be good to clear up overlaps. Creating consistency in the ever changing world of plant management would be a very challenging task.

8.7. Grants

8-7.1 – Increasing the amount of DNR grant funding may sound like a good thing. More funding will mean a greater work load for the DNR staff and the next thing is what else can be granted. Then we will have the same problem with not enough funds to cover all the grant requests. Also more training of staff and county was mentioned in 8-6.4&5.

8-7.2 – With the increased funding the first thing that happens is let's cover more projects ending up with the same problem we had before the increase. Then the new projects will take priority leaving some existing categories for the stakeholders to try to fund. This would allow the potential for lake plants native or non-native to overtake the body of water.

8-7.3 – Setting clearer criteria may help the stakeholder when applying for a grant. This is a touchy area and can easily become too strict.

8-7.4 –DNR funding of a wider variety of APM techniques, such as mechanical harvesting, and other methods could replace herbicide treatments. APM without the use of herbicides could reduce the potential for development of herbicide resistance in aquatic plants. This might be a costlier path and leave the chemical APM without support. Every lake is different and this needs to be taken into consideration at the time of grant funding.

8-7.5 – A three year period of time seems to be a pretty good amount of time. I know for Healthy Lakes the 2 year time period has been working well.

8-7.6 – Instead of limiting funds to stop chemical treatments guide stakeholders to use other methods of control which may be grant funded. The idea that without funding maybe the plants will not build up a herbicide resistance as in agriculture will not help out the stakeholder with the excessive plant issue. A different form of control will need to be addressed and possibly grant eligible.

8-7.7 – How would it be decided that a population is well-established in a lake and not be a nuance? What controls would be recommended to keep a body of water like Chute Pond from becoming a weed lake? Right now Oconto County has camp grounds and there is extensive fishing and recreation on this body of water. Totally eliminating any herbicide treatment grants would be very costly for the stakeholders.

8-7.8 – This one is similar to 8-7.7 except it goes to complete elimination of herbicide treatments. Doing this type of total action without leaving some way that treatments can be used could be very costly for the stakeholders.

8-7.9 – A strategy for APM and AIS management would defiantly need to be developed with reduced or no grant funding. Possibly a strategy should be developed and tested before it is totally implemented. This will take time to do such a project.

8-7.10 – Working to do Clean Boats Clean Waters is very difficult to carry out. Watershed projects are a new experience for all lake people. If doing Healthy Lakes projects and working with the county on these projects would count then that we are starting on the right path. Major watershed issues with the river running into the lake will take more assistance and expertise than the stakeholders would be able to do. This would require grants.

McCord, Ashleigh I - DNR

From: Marc Schmitz [redacted]
Sent: Thursday, January 24, 2019 5:49 PM
To: DNR WQSS APMSA
Subject: Comments to WDNR Aquatic Plant Management Alternatives

Please see below comments in response to the Wisconsin DNR's strategic analysis draft and management alternatives.

7.4. Implications of Recent Findings on Herbicide Use in Aquatic Environments
We should be avoiding generalities. 10 acres defining large scale treatment depends on the total acreage of lake. Also consider biomass/impairment reduction of AIS instead of just frequency of occurrence when deciding if a treatment was successful or not. We have not had many small scale treatment failures using systemic herbicides, which is contrary to what is stated or implied in this section.

8.1. Collaboration

Collaboration - Alternative 1. Create an APM Study Group for communication and collaboration with stakeholders on the direction of APM policy in the state.
This is a good idea as long as it includes representation from the industry.

Collaboration - Alternative 3. Establish a more public and open process around APM activities and decision-making during the APM permitting process.
This is not necessary. The option for public meeting has been around for a long time, and there has only been enough interest about 5 times since 1989. Implementing something that may increase the length of time of the lake permitting process is not a good direction to follow.

Collaboration - Alternative 7. Implement strategies to support further adoption of Integrated Pest Management (IPM) in APM practice.
While implementing IPM is important, forcing certain methods to be used when they don't have a chance of being very effective is not a good idea. For example, mandating that DASH be used on acres of EWM.

Collaboration - Alternative 10. Reduce APM permitting fees to make APM more affordable for permittees.
The current APM fees are not the issue with people choosing to treat legally or illegally. The usual reason people choose not to treat is "we don't want the DNR in my backyard".

Collaboration – Alternative 11. Reduce department reliance on limited-term employees (LTE) for implementation of the APM program or designate specific scenarios in which permanent staff should take on the work.
Yes, the LTE employees often have little to no experience in interpreting the code. Either finding a way to retain them longer term, or shift it to permanent staff would be helpful.

Collaboration – Alternative 12. Request input from APM stakeholders at annual meetings on research questions of interest.
This would be helpful in cooperation from the industry side of things. Partial cost sharing would likely be available from various industry groups in regards to research projects, etc.

Collaboration – Alternative 13. Create a new permanent position within the department to facilitate collaboration between the department and APM service providers.
A full time person that is in our water management region would be the best choice for communicating with us.

8.2. Department Resources and Workload

Resources and Workload - Alternative 1. **Increase the number of department APM staff.**
An increase in APM staff may not help to decrease workload because some of the increase in workload can be contributed to the decisions made by some of the current full time staff such as:

1. Changing policies during the busy time of the year. This causes unnecessary friction and headaches to everyone involved
2. Waiting until the last moment (day 14 or 15) to review a permit. This causes unnecessary friction and stress between APM staff, applicators, and other stake holders.
3. If a lack of equipment (trucks and boats) prevents APM staff from completing directed supervision, we should not have to halt our own schedules

Resources and Workload - Alternative 2. **Create new DNR positions specializing in APM and AIS for each region of the state.**
This specialization would decrease workload and increase efficiency since the current lake biologists are already spending a lot of time supervising current APM staff

Resources and Workload - Alternative 3. **Reduce regulation of APM in private ponds.**
A multiyear permit would decrease the amount of work for everyone. Small ponds don't change much form year to year, thus the management doesn't change much from year to year. If multiyear permits are implemented, reporting requirements should be kept the same and an easier option needs to be added so that new products can be added to the permit as they come available.

Resources and Workload - Alternative 4. **Allow issuance of multi-year permits for chemical APM projects in public waterbodies, following the approval of an APM plan.**
As long as permit fees and requirements are updated and oversite continues during the duration of the permit, treatments would be conducted in an ecologically responsible manner as well as in accordance to the product label.

Resources and Workload - Alternative 5. **Increase permit exemptions and/or develop general permits when the purpose of management agrees with the purpose of NR 107.**
Keep exemptions to a minimum. Most public treatments are for the control of aquatic invasive species. This already meets the requirements of NR107.

Resources and Workload - Alternative 6. **Increase APM permitting fees to support additional staff, efficiency, and collaboration.**
An increase in fees to support more staff does not mean there will be an increase in efficiency and collaboration. See notes listed in 8.2 alternative 1.

Resources and Workload - Alternative 8. **Partner with DATCP to develop a certification program specifically for APM in public waters.**

This is unnecessary. The label is the law and will always be followed when conducting pesticide treatments. In addition, there would likely be little difference between the current aquatic pesticide certification and this newly created class.

Resources and Workload – Alternative 10. **Designate a specific annual time-window in which APM permits can be submitted and processed.**
Limiting the application time for permits would only create friction between APM staff and applicators/stakeholders. Many permits arise every year during the treatment season by people who want weeds and algae take care off for a specific event or time during the year, or who have a sudden, previously un-encountered problem. Forcing them to adhere to a strict permit application window will only alienate these people and encourage illegal treatments without DNR oversite.

8.3. Public Outreach and Communications

Outreach and Communication - Alternative 3. **Dedicate DNR APM staff to periodically revising informational factsheets and outreach materials with the latest information to keep messaging current.**
Industry should be involved in this process. We can help contribute to new APM discoveries and practices as well as help to disseminate information on best management practices.

8.5 Integrating New Information

Alternative 5. Require monitoring of aquatic plant communities on all waterbodies where APM is conducted
- This potential requirement is a non starter. Elevating monitoring beyond grant funded treatments to all applications would be a huge strain on both the departments limited personnel as well as contractors and financial resources of the lake districts and property owners.

Alternative 6: Require herbicide concentration monitoring for aquatic herbicide treatments supported by department grant funding.
- Yes and we believe it already is required.

8.6. Consistency in Evaluating Permit Applications
Alternative 2. Standardize the specific aspects considered in the permit review process and the methods by which they are evaluated.
- Standardization does not take into consideration the variables of the resource. One size does not fit all.

Alternative 6. Develop a working definition for the social and environmental conditions that warrant APM
- Best defined by a locally funded aquatic lake management plan. Again a one size fits all approach isn't acceptable.

8.8 **Watershed Health, AIS Prevention, Enforcement, Overall Emphasis, and Other Topics**

Alternative 2. Develop a classification system for Wisconsin waterbodies to support management decision-making.
- Use the eco region classification for evaluating EWM control.

Alternative 4. Allocate more resources toward preventing introduction of non-native plants to waterbodies with higher chances of negative ecological consequences of those non-native plant species.

- The DNR should have the authority to close boat launches on waterbodies that contain “new” invasive species(i.e. hydrilla and starry stonewort)

Alternative 5. Increase collaboration with and/or enforcement of industries which provide pathways for the spread of aquatic invasive plants

- Yes. Monitor those such as pier installers and shoreline remediation work that utilizes boats/barges coming from other areas and waters.

Alternative 9. Increase regulation of APM in private ponds.

- Absolutely not. This will only increase the opportunity for conflict between pond owners, contractors and DNR staff. DNR staff time is already very limited and pond owners already want less regulation and increasing will only embolden a negative perception of the department.

Thank you for your time and attention on this matter as well as an opportunity to give my thoughts on the options presented.

Sincerely,

Marc Schmitz

Marc Schmitz
Branch Manager
Marine Biochemists

[redacted]
Jackson, Wisconsin
[redacted]

marine biochemists
Fisheries | Weeds | Algae
Fountains | Water Quality
Loved our service? Leave us a review.

This communication and its attachments, if any, may contain confidential and privileged information the use of which by other persons or entities than the intended recipient is prohibited. If you receive this transmission in error, please contact the sender immediately and delete the material from your system.

McCord, Ashleigh I - DNR

From: Russell Senso [redacted]
Sent: Wednesday, January 9, 2019 5:08 PM
To: DNR WQSS APMSA
Subject: RGS Comments APM in WI Draft Strategic Analysis

I would first like to thank everyone involved in this effort. I found this draft document to be very educational and enlightening. I am also thankful for being allowed to comment on this draft. I made my comments based on the assumption below from the document purpose description.

The purpose of the document as described: Is intended to serve as an informational resource to help decision makers and the public to better understand the topic, and to aid in the crafting of future policy. It does not establish WDNR (department) policy for the review of specific Aquatic Plant Management (APM) projects or proposals.

General Comments:

A couple of things I found be of special concern:

- **The discussion on enhancing the public input process.** Though it is always good to have public awareness, understanding and input, this aspect of APM has the potential to overburden the process. I recommend that special care be given to creating a manageable process. I feel it to be more important for the public to be involved when chemicals are used vs other APM techniques.
- **The shortage of department staff in comparison to the present and anticipated future workload.** It is apparent that substantive staffing changes are required to protect the Water Resources of the State. I recommend a significant increase in department staffing.
- **The staffing issue is coupled with funding and an obvious source for funds is its permitting fees.** The State does not spend nearly enough on APM when comparing it to the value of our water resources. APM funding must be substantially increased. I am opposed to permitting fees as a vehicle for funding the management of our water resources. Increases in fees for the general public can lead to negative effects by either allowing a problem to continue or illegal (non-permitted) management activities. I believe permitting fees should be waived for projects that are in the general public's best interest.
- **Multiple department collaborations** may seem good on the surface but they can lead to another level of bureaucracy and a time consuming process. Caution should be used in developing any collaboration process. A specific lead agency should always be appointed and should have overriding authority.
- **APM permitting process timing (e.g. extensions to work with special interest groups, permitting application windows, etc.).** I am opposed to anything that can lengthen the APM permitting process. I am in favor of maintaining a set permit review time after a permit application has been deemed complete.
- **APM timing:** I could not find in the Draft, an adequate amount of information and discussion on the timing for manual plant removal. I did find some but this topic demands more discussion. Much time is spent on preventing invasive plants from entering our water bodies via recreational watercraft however permits are issued for cutting, pulling, rolling, vacuuming etc. as plant management strategies. It would appear to me that these management methods, if conducted during the growing season, could lead to a significant increase in the the dispersal of the plants you are trying to contain.

Specific Comments:

Section 2.6 DNR Grants and Aquatic Plant Management:

It is my position that when a lake association is willing to assist the department in managing the State's public water resources it should not be required to provide matching funds for grants. It is the responsibility of the State to protect our natural resources and when an association is willing to help they should not be burdened with also having to fund this help. By helping to control invasive species in a public waterway, associations do not receive any special benefits that the general public does not enjoy. Grant monies should be an option to associations that are enhancing a public waterway for public use. Matching funds should only be applicable where the general public does not benefit (e.g. private ponds).

Section 4.1 Costs and 4.2 Benefits:
After reading the information below it is apparent that the state does not spend anywhere near enough to protect our valuable water resources.

"Total statewide spending on APM is estimated at roughly $9.3 million a year. Of this approximately half ($4.6 million) is spent by the department, while the remainder ($4.5 million) is spent by a combination of lake associations, local governments, conservation and outdoor groups, other state agencies, federal agencies, property owners' associations and individual property owners . . . .
The recreational value of Wisconsin's lakes and rivers is reflected by the fact that there are over 600,000 registered boats in the state – more than one for every ten residents. In a typical year, the department issues over 800,000 resident fishing licenses and 100,000 non-resident licenses, with anglers spending more than 15 million 'fishing days' in the state. Boating and fishing, as well as swimming and other recreational activities, generate sales and employment in sporting goods, groceries, restaurants, and lodging, as well other goods and services . . . . According to the Wisconsin Department of Tourism (2018), visitors to the state generated over $20 billion in total sales."

Section 8.1

Alternative 1. Standing High Level Study Group:
I support this as the value could be to gather, evaluate and disseminate the most current information to lake associations and the public regarding management practices.

Alternative 2. Mentorship Program:
This alternative may lead APM permit applicants to rely less on department APM staff or private consultants in management planning. The mentorship plan is a way for organizations/individuals to get upfront help from **non** department people in understanding the department's permitting processes. This could also help stakeholders to stay current on the issues. I could see a cost benefit to others in being able to learn the permit process and how to write a management plan without involving the department or consultants upfront.

Alternative 3. More Open Public Awareness and Involvement Process:
As a riparian property owner I like to be in the information loop but I can see where enhancing this process has the potential to be quite burdensome during the APM permit process. People have the right to know but with that comes the responsibility for a reasonable investigation on their part. I suggest caution here as this could get a life of its own.

Alternative 4. Extend the maximum amount of time allowed for processing APM permits when collaboration with Native American tribes or the Great Lakes Indian Fish and Wildlife Commission (GLIFWC) are required: Though I commend the Native American tribes for their contributions in this matter it seems redundant if it is already a requirement to collaborate. Hopefully any new timelines would be within reason and still meet tribal, federal and state requirements.

Alternative 5. Require all department APM coordinators to obtain and maintain Department of Agriculture, Trade, and ConsumerProtection (DATCP) certification in aquatic pesticide use:
This sounds reasonable unless it is duplicative of existing department staff required training.

Alternative 6. Require DATCP pesticide applicator certification or other training certificates for consultants who do not conduct chemical treatments but define treatment areas and choose products and application rates:
I believe this should be mandatory.

Alternative 10. Reduce APM permitting fees to make APM more affordable for permittees:

I strongly agree and at a minimum one should create some reasonable permit categories possibly based on DNR work requirements and private versus public.

Alternative 11. Reduce department reliance on limited-term employees (LTE) for implementation of the APM program or designate specific scenarios in which permanent staff should take on the work:
Strongly agree as this can be very frustrating and inefficient to have to constantly train new individuals.

Section 8.2 Department Resources and Workload:
It is apparent from this document there is a definite shortage of department staff working under the current aquatic management process. I support increasing department staff and at the same time stream lining the permit process. The department has had sufficient time to evaluate which management practices warrant enforcement through the permitting process. I would give them the freedom to eliminate many of the permits and to simplify the process for low risk management requests. Give the appropriate staff the authority to approve, renew or eliminate the need for many of the simple tasks that fall under the same umbrella with high risk projects.

Alternative 6. Increase APM Permitting Fees:
This is the opposite of Alternative 10 in Section 8.1. See response above. This should be considered as a last resort. As the public becomes educated on water management issues it is apparent that a new streamlined approach will be required to handle the increased resource requirements. One must change the process and increase staff but fund the staff increase from a different source other than permitting fees. If you make the fees unreasonable the public will be prohibited from legally protecting the resource.

Alternative 10. Designate a specific annual time-window in which APM permits can be submitted and processed:
I do not approve of this constraint. This has the potential to limit required immediate actions should the need arise. If this alternative is enacted I suggest that an "exception clause" be added to allow for extenuating circumstances.

Section 8.3. Public Outreach and Communications:
The public needs to be protected and I am in favor of general public outreach if it does not place an unreasonable burden on the individual permitting process and/or if it does not use funds needed for department staffing in the specific permitting process area. If the process becomes too cumbersome many may decide or not have the time to get involved.

Section 8.5 Integrating New Information:
I feel it is the department's responsibility to monitor and distribute the most up-to-date management practices to the state's lake associations and the public either through the department’s website and/or through discussions with department staff during the permitting process. Basically, help educate the lake associations and the public on how best to manage their water resources.

Section 8.6 Consistency in Evaluating Permit Applications:
This is difficult to do when there are so many different ecosystems in the state. I support consistency where it is warranted but because of the diversity in nature this might not be a good idea. It might be reasonable to permit a certain activity in the southwest but there may be no need for restrictions in the northeast. I would respect the knowledge of the department APM managers and give them as much flexibility as the law will allow.

Section 8.7 Grants
Concerning having to match a percentage of grant allotments; Lake associations, conservation groups, etc., as grant recipients should not have to provide matching funds where the management of the state's resources are being benefitted for the public good. It is incredible that we ask the employee to pay the employer. We must do away with certain aspects of matching funds if people are willing to work to help enhance the states public waters. Matching funds are applicable only where it benefits private properties such as fish farms or private ponds. If grants require matching funds then a completely new vehicle needs to be created for funding APM concerning public waters.

Section 8.8 Watershed Health, AIS Prevention, Enforcement, Overall Emphasis, and Other Topics

Alternative 1. Heighten emphasis on runoff issues and ecological stewardship in the department’s APM program:
Runoff issues have major impacts on our water resources and any efforts that help to control runoff I strongly support.

Minor suggestions:

- Many of the same **abbreviations** are defined multiple times (e,g. APM and department). This is not necessary.
- Suggest changing the wording in Section 4.1, page 24, Associations**: of the 710 formal Wisconsin lake associations, 550 or so non-profit lake associations spend . . . .**
- Possible typo in Section 5, top of page 31. Tribal Governments located **with** the state. (Should be **within** the state.)
- Suggest adding a definition, in the glossary, for **Anthropogenic**, which was used in section 7.7, paragraph 2. (It is an adjective that describes changes in nature made by people.)
- Correct a typo in Section 8.1, Collaboration Alternative 10. (change "**be to be" to simply "to be"**)
- Correct a typo in S 2.1, page 120, last line (change **comment** to **common)**
- Correction, S.3.5. Biological Control, page 170. I believe this to be incorrect "in a 56 ha (38 acre) pond in Vermont" and should possibly be 56 ha (**138** acre) pond in Vermont.

Thank you for allowing the public to comment on this document.

Sincerely,

Russ Senso
[redacted]
Neenah, WI 54956

McCord, Ashleigh I - DNR

From: Linda Szramiak [redacted]
Sent: Friday, January 25, 2019 4:40 PM
To: DNR WQSS APMSA
Subject: Comments on WDNR strategic analysis of aquatic plant management

To: Carroll Schaal and James Pardee

Thank you for allowing me to comment on the WDNR's strategic analysis of aquatic plant management. I strongly feel that there needs to be more attention given on the environmental impacts of chemicals permitted to treat aquatic plants. Interestingly enough as I was writing this email I stopped to watch a tv news story on how the FWC (Florida Wildlife Conservation Commission is temporarily suspending spraying aquatic herbicides due to the impact on the environment. (January 25, 2019)

Before a lake is granted a permit to treat, if there is an association, there should be a consensus of the Board as well as a majority of the association members agreeing to chemical treatment. Treatments impact not only the plants and animals but also those who use that lake for recreational use and own property. Not only would a detrimental treatment negatively impact the lake's environment but could also impact property values. A few individuals should not make the decision to chemically treat when the critical decision can impact a lake for generations to come,

Sublethal impacts of the chemicals should be taken into account before granting a usage permit, not how many plants or animals die but how they are impacted. A newer chemical on the market would not have long term or even short term studies available. This presents a major problem because a lake association has no scientific information to rely on other than what the chemical company publishes. Examples of how sublethal impacts could have negative effects include:

- Reproductive rates of plants and animals could be impacted
- Digestive efficiency of invertebrates could be impacted
- Non-targeted plants in the treatment area could lose their habitat value for insect larvae which fish need to feed on

The current guidelines do not accommodate these concerns. I hope you take my concerns into account when drafting a new APM policy. Thank you again for allowing me this opportunity to comment.

Linda Szramiak
Wisconsin Lake Leaders Crew 10
Walworth County Lakes Program Coordinator
Turtle Lake - Walworth County [redacted] Delavan, WI 53115

McCord, Ashleigh I - DNR

From: McCord, Ashleigh I - DNR
Sent: Monday, January 7, 2019 11:15 AM
To: DNR WQSS APMSA
Subject: FW: Aquatic Plant Management in Wisconsin: Draft Staretgic Analysis

---

From: Schaal, Carroll - DNR
Sent: Monday, January 7, 2019 10:40 AM
To: McCord, Ashleigh I - DNR <ashleigh.mccord@wisconsin.gov>; Nault, Michelle E - DNR <Michelle.Nault@wisconsin.gov>
Subject: FW: Aquatic Plant Management in Wisconsin: Draft Staretgic Analysis

Please consider this a submission. I will respond to Jeff thanking him and clarifying the role of the SA versus a program review.

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Carroll Schaal
Phone: (608)261-6423
Carroll.Schaal@Wisconsin.gov

From: Jeffrey Thornton[redacted]
Sent: Monday, January 07, 2019 10:32 AM
To: [redacted]
Cc: Schaal, Carroll - DNR <Carroll.Schaal@wisconsin.gov>
Subject: Aquatic Plant Management in Wisconsin: Draft Staretgic Analysis

Dear Thomas, Thank you for sharing this document. As you can see, I am copying Carroll Schaal in this email on the chance that the WDNR are still accepting comment on the document.

That said, the analysis is well written and presented, although I feel that it is heavily skewed toward the use of aquatic herbicides, with rather cursory treatment of non-chemical techniques. I also found no reference to actual aquatic plant management plans, of which there must be a great many in the WDNR archives. The references to planning were appropriate, but limited and the outlines of the planning process simply that...outlines without any explanation of how and what components are intended to highlight. It was gratifying, though, to see that some acknowledgement of a watershed-based approach to lake management was included.

It was curious that this evaluation was undertaken by WDNR staff. Generally, program reviews of this nature are conducted by independent third party reviewers. Foe example, I have been asked to conducted mid-term and final project reviews by various international organizations, but always the projects which I reviewed were projects with which I had not been previously associated. This allowed a detached assessment of both positive and negative aspects of the projects and unbiased suggestions for the future of the projects. These evaluations have been published on the various websites of the agencies involved to ensure transparency. That said, the current evaluation did make use of focus groups to review aspects of the aquatic plant management strategies discussed and suggest future directions. While this no doubt does introduce a "third party" viewpoint, the fact that participants in the focus groups were "selected" could unwittingly introduce a bias in the outcome of the report. As I have said, there did seem to be a bias to chemical management approaches.

I would draw the attention of the authors to the fact that the use of aquatic plant harvesters to "top chop" stands of Eurasian water milfoil should be discussed. The Southeastern Wisconsin Regional Planning Commission (SEWRPC) staff conducted a survey of the efficacy of this approach at the Lauderdale Lakes and the results were included in the aquatic

plant management plan for that waterbody (in Walworth County). This approach reduced the competitive advantage of the milfoil by removing the canopy and encouraging light penetration into the waterbody, thus restoring the ability of native aquatic plants to compete with the invasive specie. SEWRPC concluded that harvesting would have to be conducted regularly for this effect to be maintained. Review of existing aquatic plant management plans already completed may reveal similar insights that should be considered as part of the statewide strategy. At a minimum, some indication of the numbers of aquatic plant management plans that have been prepared would be an interesting statistic, especially when compared with our 15,000 inland lakes!

While native plantings are included, this approach is only considered in passing, and the role of shoreland management is ignored. While the in-lake plantings carried out in Pewaukee Lake (if memory serves--it may have been Lac La Belle) in Waukesha County were inconclusive, the use of shoreland plantings as a nutrient management tool was not covered other than in very general terms as reducing nutrient inputs from the watershed. Shoreland management also is critical for the survival of organisms such as the milfoil weevils. These weevils, at least anecdotally, result in the periodicity of Eurasian water milfoil success and failure that is frequently observed in lakes (in southeastern Wisconsin, at least).

The occurrence and abundance of cyanophytes/cyanobacteria is an interesting subject which was only touched upon in the report. There is considerable information on the factors affecting these plants/bacteria in the literature from the tropical/subtropical regions and especially from southern Africa. One factor that seems to be important is the ability of these organisms to regulate their buoyancy. In much the same way as Eurasian water milfoil establishes its dominance, blue-greens can capture the ambient sunlight and outcompete other algae. It also seems that Nitrogen-to-Phosphorus ratios are important indicators of blue-green success--the closer such rations get to 1:1, the more likely it is that blue-greens will be the dominant species. Further, turbulence can effect their success, with highly turbulent waters disrupting blue-green success. Of course, in such situations, diatoms such as Melosira spp can become dominant under conditions of nutrient enrichment.

Lastly, in terms of monitoring, the report omits evaluation of the monitoring methodologies. While current state policy promotes the grid-based (point-intercept) methodology developed for shallow waterbodies (utilized at Houghton Lake, Michigan), the transect-based sampling utilized in many Wisconsin lakes may provide a better assessment of aquatic plant communities as the grid-based method assumes a uniform distribution of aquatic plants across a waterbody, while the transect-based method better reflects the unique characteristics of the various plant species relative to depth, light penetration and substrate composition. The use of either technique should be evaluated based on the morphology of specific waterbodies, with the grid-based method being appropriate to shallow, flat-bottomed lakes and ponds and the transect method being applied to steeply contoured environments. In any case, the recommended monitoring of Wisconsin lakes could be influenced by the choice of method. Again, various aquatic plant management plans developed by SEWRPC have employed both techniques as appropriate.

In closing, thank you for the opportunity to comment on the Draft Strategic Analysis. Let me wish you and yours a very happy New Year.

Best regards,

Jeffrey A Thornton PhD MBA PH
Managing Director
International Environmental Management Services Ltd

McCord, Ashleigh I - DNR

From: Toshner, Pamela J - DNR
Sent: Tuesday, January 29, 2019 12:16 PM
To: DNR WQSS APMSA; Schaal, Carroll - DNR
Cc: Aartila, Tom P - DNR
Subject: APM Strategic Analysis Comments

Hi,

Thank you for the opportunity to comment again on the APM Strategic Analysis. Your efforts are remarkable and will help the program in the future.

Comments:

- While Section 8 Management Alternatives includes some reasonable program improvements, it reads like a lot more work for staff and partners with almost more of a research spin than real, practical program improvements. It makes total sense to list the alternatives so long as there is further collaboration on the actual implementation of those ideas.
- Page 73:
  - "More research is needed on the efficacy of utilizing control as an AIS containment strategy in the event that eradication is not achieved. While logic suggests control efforts that reduce invasive plant abundance within a waterbody would lead to fewer plants being moved from one waterbody to another, there are no studies examining whether control efforts that reduce AIS abundance reduce AIS spread between waterbodies." Isn't our statewide AIS strategy prevent, contain, control? Don't we know recreational boaters are the primary vector for AIS spread? I'd think the control as containment question would be relatively easy to answer through a lit review or even analyzing existing DNR datasets. I believe Minnesota has done some work like this, and a quick google search resulted in several reputable examples/reports/organizational policies of control as a containment.
  - "This "wait-and-see" strategy is appealing because it may require a smaller financial investment up front and extensive cost savings in the long-term if abundance and impact remains low." I don't think this is accurate. Annual monitoring costs for several lake management consulting firms (e.g. $14,000 year on an unmanaged <50 acre lake with ~2 acres of Eurasian watermilfoil) substantially exceed potential treatment costs particularly for early and small populations, which don't even necessarily require monitoring in the current regulatory framework. If DNR staff or volunteers were doing the monitoring, the statement would perhaps be true. At a minimum "extensive" should be deleted, and in this case I'd suggest "more research is needed" is appropriate to qualify the statement/speculation.

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Pamela Toshner
Lake & Watershed Protection Specialist – Water Quality Bureau/Environmental Management Division
Wisconsin Department of Natural Resources
810 West Maple Street
Spooner WI 54801
Phone: (715) 635-4073 Desk (715) 795-0102 Mobile
pamela.toshner@wi.gov

dnr.wi.gov

McCord, Ashleigh I - DNR

From: Tumbleson, Melissa J - DNR
Sent: Wednesday, January 9, 2019 1:59 PM
To: DNR WQSS APMSA
Subject: Comments on APM Strategic Analysis

Good afternoon,

I wanted to provide some updated language for the section on endangered resources reviews, my edits are below. I did also want to mention that avoiding impacts to special concern species is not legally required by either the state endangered species law or the Federal ESA. If your program would like to retain this language it can, I just wanted you to be aware that it wasn't a legal requirement.

Page 238, third bullet, original paragraph:

The NR 107 or NR 109 permit application is evaluated based on existing information about the target site and plant community, according to the criteria outlined in s. NR 107.05 or NR 109.05, and a decision is made. In order to comply with the Federal Endangered Species Act, department staff must conduct a department Natural Heritage Conservation review for the target site of all APM permits. Herbicide formulations at concentrations which have been shown to negatively affect federally listed species of Special Concern, Threatened, or Endangered status will not be permitted.

Suggested revised paragraph:

The NR 107 or NR 109 permit application is evaluated based on existing information about the target site and plant community, according to the criteria outlined in s. NR 107.05 or NR 109.05, and a decision is made. In order to comply with Wisconsin's Endangered Species Law and the Federal Endangered Species Act, department staff must conduct an Endangered Resources Review for the target site of all APM permits. Herbicide formulations at concentrations which have been shown to negatively affect the taxon group (e.g., frogs, bats) of a state- and/or federally-listed species of Special Concern, Threatened, or Endangered status that has been recorded within the vicinity of the project area, based on a search of the Natural Heritage Inventory (NHI) Portal, will not be permitted.

Thanks,
Melissa

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Melissa Tumbleson
Endangered Resources Review Specialist – Natural Heritage Conservation
Wisconsin Department of Natural Resources
Phone: 608-267-0862
melissa.tumbleson@wisconsin.gov

dnr.wi.gov

NOTICE: This email may contain confidential data on endangered resources (including NHI data) and other information for the sole use of the intended recipient. Any distribution to others is strictly prohibited without permission from the original sender. If you are not the intended recipient, please contact the sender immediately and delete all copies.

McCord, Ashleigh I - DNR

From: [redacted]
Sent: Thursday, January 17, 2019 7:25 AM
To: DNR WQSS APMSA
Subject: Comment aquatic plant management

What is needed is a added fee for all boat registration to cover the cost of invasive weed cleanup.

Maybe $2.00 / $3.00. We all use the lakes, not just the lake home owners.

Thank you,

John Uecker

McCord, Ashleigh I - DNR

From:	John Winkelman [redacted]
Sent:	Tuesday, January 22, 2019 4:56 PM
To:	DNR WQSS APMSA
Cc:	Brad Subler; Cathy Snyder; Charlie Spencer; Linda Frese; Mike Winger; Terry Boyle; Jeff Frese; Jim Van Pelt; Eddie Heath; Tim Hoyman
Subject:	Comments sought on WDNR strategic analysis of Aquatic Plant Management in Wisconsin
Attachments:	GLA DNR Response Jan 2019.docx
Importance:	High

The attached document contains comments from the Gresham Chain of Lakes. They were compiled by the Gresham Lakes Association Board of Directors and Invasive Species committee.

Regards:

John Winkelman
[redacted]
Boulder Junction, WI 54512
[redacted]

To: DNR
From: Gresham Lakes Association and Invasive Species Committee
Subject: Response to "Aquatic Plant Management in Wisconsin: Draft Strategic Analysis"
Draft submitted by WDNR, December 2018

The Gresham Lakes Association, and its Invasive Species Committee, appreciate the opportunity provided to us to review the draft of "Aquatic Plant Management (APM) in Wisconsin: Draft Strategic Analysis" submitted by the WDNR for public review in December, 2018. The document is comprehensive in its inclusion of subject areas that comprise the overall APM discussion. While the document draft specifically states that it "does not establish department policy for the review of specific APM projects or proposals", it does provide significant insight into the current thinking of the WDNR, and hints toward what might be expected directionally over the coming years with respect to WDNR's stance on APM.

Our comments and responses are found below. While much of the "end-game" is contained in Chapter 8 – Management Alternatives, we would also like to address several other sections of this draft. Specifically, the responses that follow are organized as follows:

1. APM Economics
2. Survey Composition
3. Comparison to Other States
4. Review of Management Alternatives – GLA's Perspective

---

1) APM Economics

The document makes very specific reference to the costs associated with APM, both in the Executive Summary, and further detailed in Chapters 2 and 4. The document also describes in Chapter 2 the limited amount of staff available within existing budgets to address an increasing demand for permitting activities. Costs are further

discussed in Chapter 4. Inclusion of this cost data makes clear the constraints the DNR currently faces given the budget parameters that exist today.

Chapter 4 further describes the benefits of the APM program, both in terms of "direct" and "indirect" benefits. The direct benefits documented appear to be relatively well quantified, focusing largely on those incrementally employed to assist with APM. While these benefits are most thoroughly quantified, they are likely to be immaterial in the larger picture.

"Indirect benefits" are likely of a much greater magnitude. The analysis of indirect benefits is less well quantified, particularly as it relates to APM impacts on tourism and property values. There are several studies referenced regarding indirect benefits. One conducted by UW economists determined there was a 13% negative impact in lakeshore property values where AIS exist, which somewhat obviously translates to a dire scenario. Of concern, this study is subsequently dismissed later in the chapter, with tacit support instead given to a study yielding much more modest conclusions. Further discussion of "opportunity costs" seems to suggest a subtle belief that real and substantial economic benefit stemming from an aggressive APM program can either not be realized or measured.

The conclusions or inferences described above are of concern with respect to Oneida and Vilas counties, which rely heavily on tourism (both in terms of "visitors" and "seasonal owners") for their economic well-being. A study conducted by UW Extension and Vilas County provides a well-documented summary of the importance of tourism to Vilas county. Several of the study's observations are included below:

- Vilas county is second in the state in terms of "per capita direct tourism spending"
- Assessed property values in Vilas county were $7.2 billion in 2013, of which $5.6 billion was associated with "on water" properties.
- Of all homes in Vilas County, census figures suggest 61.5 percent are considered "seasonal". In terms of assessed value, the percentage attributed to seasonal homes is higher.
- Vilas county receives over $215 million in direct tourist dollars per year, and another $69 million per year in direct spending by seasonal residents.

While we understand the difficulty of quantifying the indirect benefits of APM, and the significantly differing conclusions of the several studies referenced, it appears that indirect benefits have been undervalued in this document, particularly for communities with a heavy reliance on tourism to drive their economies.

The GLA supports further refinement of the estimates for indirect benefits, so that their impact can be appropriately factored into any decision-making around APM policy. The estimates shared in this document appear to be insufficiently refined to support that goal, with a potential bias toward understatement.

One possible approach to this refinement would be a differential analysis based on geography. The DNR recognizes in its document that some geographies are more dependent than others on tourism. It follows that these geographies might derive a

greater economic benefit from APM than those less dependent on tourism. Recognizing these geographical differences will result in an improved analysis of indirect benefits, and may set the stage for a differential APM approach that recognizes these distinctions.

2) Survey Composition

The bulk of survey respondents are DNR staff (18%), or APM contractors (35% of non-DNR groups). Said differently, roughly 50% of survey respondents are either DNR staff, or represent organizations that are to some degree dependent on the DNR for their ongoing livelihood. While this is not to suggest a bias per se, there is a strong likelihood that "practitioners" will have a different set of values and priorities than landowners or business owners in areas affected by AIS. The composition above suggests the survey may be heavily weighted to these "practitioner" priorities.

As referenced in the Strategy document, Oneida and Vilas counties are somewhat unique in their dependency on tourism in its various forms. However, of the 48 non-DNR groups responding, only 2 (both lake groups) are from these counties. It appears that unlike the above, this category of respondent is underrepresented in the survey.

While the survey quotes in the detail of Appendix E seem generally balanced across each respondent type, we point out the composition above as a caution against drawing overly generalized conclusions from the survey results.

Additionally, while some of the quotes in Appendix E reference a concern for maintenance of property values and tourism levels, these concerns don't "make the cut" in the summary of concerns documented in Section 6.2 – "Interview Findings". While found in the Appendix E detail, there no discussion in Section 6.2 regarding the balancing of careful AIS treatments with the maintenance of economic viability within a community. Unfortunately, the discounting of AIS economic impacts seems to be a somewhat common thread throughout the document.

3) Comparison to Other States

This section provides some interesting comparisons between Wisconsin and other states. Of particular interest is a comparison of Wisconsin's permitting levels to Minnesota's. Specifically, the document references 1700 APM permits issued in Wisconsin in 2018, while Minnesota issued 4000-5000 in roughly the same timeframe, a significantly greater number. It would be helpful to understand what factors lead to that difference, which appears significant and should be explainable.

Also of interest would be a comparison of spending between the two states. While Wisconsin's spend on APM is well documented in the Strategy document, the ability to compare this spend to other states (specifically Minnesota) would provide context for answering the question of "how aggressive are we being when compared to other states facing the same problem".

4) Review of Management Alternatives – GLA's Perspective

The members of the GLA have a great appreciation for the need to be good stewards of our lake resources, and recognize that any approach to APM needs to appropriately account for understood and accepted environmental impacts. We also believe that an appropriate balance needs to be achieved to allow for the protection of property values and local tourism.

To summarize our feedback:

- The current costs for APM in this document appear to be well understood. While we appreciate the fact that the DNR must work within budgetary constraints, we suggest efforts should be explored to develop a case to more convincingly advocate for greater expenditures.
- In order to make this case, the benefits of APM will need to be better understood, quantified and championed. Comparisons to other states may also be helpful in building a case for a more aggressive APM stance
- We understand that "one size doesn't fit all" and would encourage the evaluation of differential management strategies based on divergent environmental and community factors.

Below is our more detailed feedback regarding the alternatives documented in Chapter 8 – "Management Alternatives:

a. 8.1 (Collaboration)
    i. Generally support anything that <u>materially</u> improves collaboration between the various entities involved in APM.
    ii. Additional DNR effort to improve collaboration need to fit in the context of current and/or future budgets
b. 8.2 – Department Resources and Workload
    i. We support Alternative 1 – increase APM staff. This is founded in a belief that APM efforts are likely understaffed at present, and further investment in APM should be explored across all categories of expenditure, including staffing.
    ii. Other alternatives documented in 8.2 deal with departmental efficiencies that others are in a better position to comment on.
c. 8.3 – Outreach
    i. Seems to go hand-in-hand with 8.1 - Collaboration
d. 8-4 – Program Tracking and Evaluation
    i. Strongly support both Alternatives (#1 – Collect data on APM, #2 – Conduct Full Economic Analysis)
        1. Both are required to effectively understand and manage outcomes.
        2. The verbiage in this section suggests more work can be done on economic analysis. We agree.
e. 8-5 – Integrating New Information
    i. Alternative 1 – increase funding and staff for evaluation of APM projects
        1. We agree. Seems to be a refinement of the more general point made in 8-2, alternative 1

ii. In general, each of the alternatives in this section seem to warrant consideration

f. 8-6 – Consistency in Evaluating Permit Applications
   i. Alternative 1 – Define a strategic philosophy and direction for the department's APM program
      1. Yes, as long as that strategic philosophy recognizes the need for flexibility by lake type, region, and localized economic impacts, as has been expressed both in the Strategy document and earlier in this feedback.
   ii. Alternatives 2 through 7
      1. Probably little benefit in any of them until a "strategic philosophy" suggested by Alternative 1 is drafted to provide direction and structure to these activities.

g. 8-7 – Grants
   i. Alternative 1 – increase grant funding
      1. Yes. The State needs to take a more active role in managing the State's resources for the benefit of its residents and therefore ultimately for the benefit of the State. This role needs to fully consider the economic impacts, particularly in areas heavily dependent on tourism and/or part-time residents who can frankly choose to be part-time somewhere else.
   ii. Alternative 2 – Divide department grant funding
      1. If there isn't enough funding to go around, the DNR needs to address that. This alternative doesn't do that.
   iii. Alternative 3 – Clear and Open Criteria
      1. Not a bad idea, but doesn't solve the "not enough funding" problem. Additionally, there is complexity in this exercise given the need to treat dissimilar situations with some flexibility.
   iv. Alternative 4 – Use funding for a wider range of IPM projects
      1. Without additional funding in aggregate, this appears to exacerbate the funding problem ("take insufficient funding, and spread it across even more stuff")
   v. Alternative 5 – Increase time funding remains available for APM projects
      1. Yes
   vi. Alternative 6 – Limit the amount of funding available to any single sponsor (requestor)
      1. While pragmatically this would probably benefit us as the GLA (at least in the short-term), we have a conceptual problem with the artificial limits it suggests.
      2. Reading the detail, this could be workable at some level, but would need careful consideration to avoid arbitrary limits without consideration of situational nuances.
   vii. Alternative 7 – Reduce or eliminate grants for herbicide treatments where invasive species have become established
      1. This is a bad idea in general, and especially in situations where the DNR has been contributory to invasive species

spread on a given lake through its prior regulatory stances. This alternative, in a situation such as described above, absolves the DNR from responsibility if the problem they contributed to becomes "too hard" to subsequently manage. Gresham Lakes is particularly sensitive to this topic, given our participation in a 3 year study during which we didn't treat for AIS. We saw the negative results, and we would look for assistance in fixing it. We would not anticipate being ineligible for future grants.

viii. Alternative 8 – Reduce or eliminate funding for APM herbicide treatment
    1. Unlike Alternative 7, which represents a deferred "throwing in the towel" mentality, Alternative 8 does so more immediately. We feel this runs exactly counter to what is required from the DNR. The DNR needs to become increasingly active in APM management with all the tools that are available to it. Choosing Alternative 8 potentially eliminates (or significantly reduces) one of the most cost-effective "tools in our (collective) toolkit".

ix. Alternative 9 – Develop APM/AIS strategy that does not rely on DNR funding
    1. We believe the DNR should do more, not less. The DNR's responsibility is to protect and maintain our natural resources, including our lakes. This alternative doesn't embrace that responsibility. Rather, it seems based on an assumption that today's funding constraints are a given as we move forward into the future. Additionally, relying on private funding is likely to lead to inconsistent results, which given the nature of AIS propagation, will likely exacerbate system-wide issues in the long term.
    2. While the removal of funding would be bad (many lakes affected by invasive species won't be able to self-fund, and therefore no management will occur), worse would be a situation where those that want to and can self-fund a project can't move forward as a result of overly restrictive permitting criteria.

x. Alternative 10 – Priority to watershed-wide projects
    1. No opinion on this

h. Section 8-8

i. Alternative 1 – Heighten emphasis on runoff issues and ecological stewardship – while in general, the ideas in this alternative seem sound, Gresham Lakes is minimally affected by runoff given the high percentage of state-owned land on the three lakes.

ii. Alternative 2 – Develop a classification systems for Wisconsin lakes – we agree with this to the extent that classification also includes consideration regarding differential community impacts.

iii. Alternative 3 – Increase enforcement of movement of AIS between waterbodies - we would like to know more about the DNR's thoughts in implementation of this alternative. On the surface, it

makes conceptual sense, but the document highlights some very real challenges regarding implementation.

iv. Alternative 4 – Allocate more resources toward preventing introduction of non-native species to waterbodies – while we agree in principle, we are concerned that in a scenario of current budget constraints, this alternative would divert funding from those waterbodies already affected. It is unclear to us that this option would positively affect the overall health of the Wisconsin water system as a whole. It is clear, in a scenario constrained by today's level of funding, that this alternative would negatively affect those lakes already experiencing a problem.

v. Alternative 5 – Increase Collaboration with Industry – GLA has no opinion, as this is not a factor at present on our lakes.

vi. Alternative 6 and 7 – no opinion. Gresham Lakes does not experience variations from season to season that are significant enough to be impacted by these changes.

vii. Alternative 8 – Develop as set of guidelines for the bidding process for individual APM projects – GLA disagrees. The rationale for this alternative is grounded in, paraphrasing , "APM professionals have expressed frustration that they are not selected for a project when they are the low cost provider". Whether they are bidding to the State, or to individual lake groups, cost is one of many factors that influence the selection process. While the State might, if they so desire, establish guidelines for bids that they are sponsoring, it would be an overreach to extrapolate these standards to private organizations that seek the services of these APM professionals.

viii. Alternatives 9 & 10 – no opinion.

Respecfully;

Gresham lakes Board of Directors & Invasive Species Committee:
Terry Boyle, Jeff Frese, Linda Freze, Cathy Snyder, Charlie Spencer, Brad Subler, Mike Winger, Jim Van Pelt, John Winkelman

Pardee, James D - DNR

From: Jay Wittman [redacted]
Sent: Monday, February 04, 2019 8:06 PM
To: DNR WQSS APMSA
Subject: NSTLPRD Comments on Strategic Analysis of APM in WI
Attachments: NSTLPRD APM Startegy Comments.docx

WDNR

On behalf of our Lake District (North South Twin Lakes Rehabilitation and Protection District NSTLPRD) I apologize we mistakenly missed the comment period due date of 1-25-19 on the draft APM Strategy. Attached are thoughts you hopefully will still consider. It has been a very busy past few months for our Lake District with grants, permits, updated annual monitoring reports and RFP's on bids for treatment we have been exceptionally busy.

We hope you will still be able to include these comments.

Regards,

Jay Wittman
Treasurer, Commissioner
North South Twin Lakes Protection and Rehabilitation District

WDNR - APM Strategy comments by NSTLPRD

Given the abundance of lake organizations in the State, the outreach in survey reached out to a very small percentage of groups and thus is quite statistically lacking. Instead, it seems to represent the opinions of professionals in the APM world and often ignore the users of the resources. We would suggest that the survey should have been solicited to every state lake association and district in order to maximize perspective on the issues from a users perspective .Only 19 of 730 lake associations were solicited for input (2%). The Vilas County study of property values noted a 13% decrease in value attributable to invasives. This is a very relevant statistic and should be considered. However, protecting the resource and utilization of the resource by lake users should be of primary focus.

This is a very extensive and robust strategy, which on the surface, almost appears to be un-implementable. Would, a smaller scope and definition have been much simpler to implement with better effectiveness?

There are a number of "status quo" comments in the document which we feel do not suggest a collaborative approach to APM. Lets be collaborative and open minded in our thinking.

The data included in the draft strategy is a good start but standardization of data collected to monitor past management strategies, results etc is lacking. Data is the missing link in order to create and implement the most cost effective, least negatively impacting and yet successful long term management plans and actions.

Recent article by P Radomski and D Perleberg, titled **Avoiding the Invasive Trap** … makes an interesting statement "we make a case for not labeling species and instead focus on managing nuisance conditions and protecting ecosystem health". The challenge is the diversity of definition around what is a nuisance and what is ecosystem health.

DNR staffing is a critical piece in order to implement and support a complex scoped APM strategy. Today , NSTLPRD believes the WDNR lacks in human capital and in some cases the best human capital who are willing to support a collaborative APM strategy. That is critical for success.

We appreciate that WDNR is looking to create a new perspective on APM strategy and we hope it is not a "push down" philosophy but rather one that continually incorporates open minded listening, healthy debate and adaptive learning to continually strive to refine and improve APM strategies.

Other comments are below.

WDNR Workload, Available Resources, Grant Funding:

a. We would promote the implementation of creating new WDNR positions specializing in both APM and AIS management techniques for each of the regions in the State. It is apparent, based upon the permit window of acceptance period that they are understaffed, project over committed, and process permits without the proper depth of research, study, and consideration.
b. We would also suggest that these positions be "certified" in the state of the art APM and AIS management techniques utilizing both herbicide and non-herbicidal management protocols.

c. These new positions should also define and utilize a standard permit review process. Where each critical stepping stone in the life cycle of the permit process be reviewed and studied in depth. Hopefully, this will coincide with the individual lake organizations own lake management plan and individual APM goals for successful AIS control.
d. We also would encourage the WDNR to eliminate the departmental dependence on contract non-WDNR employees making permit decisions reserved for WDNR APM personnel.
e. We would also promote and suggest that the WDNR definitely improve its rapport with the various lake organizations within the State. Perhaps, an annual meeting with the State's lake organizations similar to Wisconsin Lakes, where current and state of the art APM strategies are discussed and shared, new permit processes explained in detail, etc.
f. We would also suggest that the WDNR increase their engagement with stakeholder groups, resorts, various businesses on the water, etc. Their decisions are impacting the livelihood of many individuals trying to make a living from the State's beautiful aquatic resources.
g. We would also support and encourage the WDNR to increase the amount of department grant funding available for supporting APM projects statewide as well as county and regional APM and AIS staff and other members of Wisconsin's AIS partnership. This would also include increasing the amount of time funding remains available for an APM project, once granted.

h. We would absolutely ***NOT SUPPORT*** grants based upon grants awarded to a given organization or the number of grants that any organization can receive to conduct herbicide treatments over a certain period of time, reduce or eliminate grant funding for herbicide treatments for AIS that have become well-established in a given waterbody, and reduce or eliminate grant funding for APM herbicide treatments. This mindset would be unacceptable to a vast majority of Wisconsin lake groups.

You may use as much or as little of these suggestions as you wish. No harm, no penalties, no foul.