

APM Rule Public Meeting Feedback Summary

June 2025

Compiled Public Meeting Feedback

Staff from the APM program traveled the state in the month of June. Four public meetings were held to receive initial feedback on the rule proposals. Thank you to everyone who took the time to attend and provide input in Oshkosh, Oconomowoc, Hayward, and Rhinelander. The information below is a summary of all comments and suggested changes relevant to the draft rule received throughout the four meetings.

General Comments/Suggestions

- Suggestion: A permitting structure based on waterbody size/ecology/certain criteria, rather than describing lakes as larger or smaller than 10 acres.
- APM chemical exposure response can pose a threat to untrained/unprepared Emergency Medical Services (EMS) providers.
 - Suggestion: Applicators submit safety data sheets to local fire department a few days prior to treatment so that EMS has time to review and understand how to properly respond in the case of accidental exposure to chemicals or other emergency.
- There are discrepancies between the High Value Species list and the Macrophyte Assessment of Condition (MAC) species. Consider removing High Value species that are 'tolerant' under MAC, or update High Value Species list to reflect the species sensitivities and tolerances identified under MAC.
- Should require in the rule that DNR must communicate with sponsor/contractor before permit denial.
- Definition section is great. Appreciate that many things have been defined that were not before.
- Concern that the fees and plan structure may exclude individual property owners from getting a permit to do work on their shoreline.
- Consider how aquatic plants are impacted by hydrology in permit and plan reviews.
- Proposed changes are not too dramatic; appear to be focused on securing more funding for the program with modest changes to other parts of the program.
- Suggestion: Muck blowers and other equipment like it are becoming increasingly popular. There should be explicit rules about these.

Fee Structure

- Support for increase in fees as the program should be self-sufficient and not reliant on other money from the state budget.
 - Suggestion: Include a provision that allows the fee structure to be increased according to cost of living to avoid the need for future rule revisions to address the fee structure.
- Mechanical fee is high for lake groups, especially over the 5 years.
- There may be cases where plants are very aggressive and dominant in an initial pretreatment survey, then they are not present/not at nuisance levels when it comes time to treat. Feels unfair to not be eligible for a refund if no chemical treatment occurs under an approved permit.
- Waters of the state are owned by everybody, and there are other users of these waterbodies besides the permit applicants. Having the APM program subsidized by the state general funds is acceptable.

Neighbor Notification and Public Notice

- Suggestion: Simplify riparian owner notification to a notecard/something similar for ease of notification. Cost of notification can be high for sponsors.
- Why is riparian owner notification proposed for only for people within 150 ft of the chemical treatment area? Fisherman use areas of the lake that are not directly in front of their properties and may want to be aware of these treatments.
 - Suggestion: Everyone who lives on the waterbody should be notified for every chemical application, regardless of treatment location within the waterbody.
- Suggestion: Consider adding buoys to identify areas of treatment. Allows for visitors to be aware of chemical treatment areas.
- Until you can combine the tax parcel to riparian notification, notification will not be accurate in all cases. Some organizations have hundreds of members. There are many potential gaps in this process.
- The language "any affected organizations" in riparian notification is too broad.

Waters Less than 10 Acres

- Concern for the large number of pond permits (and therefore chemicals being introduced to waterbodies) in Waukesha County. Proposed rule seems like a free pass for pond permits. The draft rule appears to limit the permit review process for pond permits.
 - Suggestion: Would like more restrictions on pond permits to limit chemicals and amounts.

Planning

- Suggestion: Include Sensitive Areas listings as a requirement in the plan.

- Suggestion: Require some sort of trigger in the rule that requires a plan or detailed analysis every 5-10 years for lakes that have a history of annual or repeat treatments that don't have a management plan. This would account for staffing turnover, etc.
- APM plans are very intensive and could be pared down to specifically focus on aquatic plants. Comprehensive lake management plans are not always necessary for APM. Specifying this could make management plans more financially accessible for lake associations.

Permit Timelines

- Routine harvesting permits should be issued for 7-10 years if no changes are made to the harvest routes
- Did not see any specific language on government-government relations with tribal entities.
- 15-day timeline seems tight for situations that involve multiple tribal entities. However, recognized that permits need to be processed in a timely manner.

Permit Decision-making

- The term "cumulative impacts" is too vague; add more specificity. How are cumulative impacts being determined?
- There seems to be variation between what information is in an approved plan and what is ultimately permitted in some cases. DNR should be able to justify why something is in an approved plan but not issued as a permit.