

APM Rule Workshop

WI Lakes and Rivers Convention

March 26, 2025

Workshop Participant Feedback Summary

This information is a general summary of all the comments, questions and specific changes brought forth by workshop participants. The department will collect all comments, questions and changes from all stakeholders through the end of June 2025. After that time the department will consider which changes may be made to the draft rule prior to releasing a first draft of the Board Order with the Economic Impact Analysis.

Questions and Answers

- Can input be directed to an advisory committee member?
 - DNR will publicize Advisory Committee names on the website. The Advisory committee members are tasked with providing specific feedback to the APM program. However, the DNR will consider all comments equally from stakeholders whether they are a member of the Advisory committee or not. The APM program encourages everyone to review the rule proposals and provide comments directly to DNR during rule drafting.
- What is the difference between riparian notification and public notice?
 - Riparian notification allows affected people to provide input before a permit is approved. Anyone adjacent to the proposed control area is to be provided a copy of the permit application. When permit applicants sign their permits now, they are saying that this was done.
 - This riparian notification requirement exists in the current version of NR107. The draft rule added some language to say this should be done within 7 days of permit submittal and that anyone within 150 feet of the control area should be notified. This proposal is meant to apply to every permit and waterbody except for chemical applications to private ponds.
 - Public notice is done for large scale chemical control applications, where over 10% of the littoral zone or 10 acres is proposed to be controlled.
- Could a group use a social media page to meet the proposed public notice requirement in the draft rule?
 - Yes, a publicly viewable social media page would be allowed.

Workshop Member Feedback on Draft Proposals

- Signage for chemical control applications:
 - "Danger"/"Warning" is too threatening.

- Public Notice Requirements:
 - Alternative suggestion: Get rid of newspaper completely - allow applicants to select two options other than newspaper
 - Alternative suggestion: Provide a list of options including newspaper and allow the local organization to select which two make sense to them.
- Compliance:
 - Desire for increase in compliance checking especially if fee increase covers 100% of program cost.
 - Suggested random compliance checks selected from the pool of permits, stated in code so it was a mandatory requirement by DNR.
- Fees:
 - General concern over fee increase
 - Concerns that non-refundable chemical fee could be detrimental to legitimate situations where a lake is unable to be treated, especially smaller lake organizations.
 - Alternative suggestion: A tiered acreage cap based on lake size to make the permit fees more equitable between small and large lakes.
 - Alternative suggestion: Design an incremental fee increase to avoid large fee increases down the road. Use the cost-of-living adjustment.
 - Alternative suggestion: Allow for a one-time fee for a 5-year mechanical harvesting permit so groups could pay in year one and not pay again until a new permit was needed. Get rid of renewal fee.
 - About half of the participants preferred this alternative to an annual renewal fee.