

Tom,

Below are the impact of the DNRs proposed NR107 rule revisions that we see as potential problems:

- **Every lake will require a very burdensome management plan prior to a chemical treatment.** For lakes that currently do not have an acceptable (to the DNR) management plan, an applicant must notify the DNR 30 days before starting a plan, and then must wait an additional 60 days after submission of the plan before even applying for a permit.
- **Permits are much more likely to be denied.** For example, if the DNR determines that a chemical treatment permit will not address “water use impairments,” the rule says the DNR shall deny it. In addition, if a treatment is inconsistent with a lake’s plan, the DNR is required to deny it.
- **Permit applications must be submitted electronically** through the DNR’s system.
- **The DNR will take even longer to review most permits** (21-45 days v. 10-15 “working days” under current administrative code)
- **Chemical treatment permits on lakes (except for wetlands) expire by October 15** of the year they are issued.
- **Dyes are prohibited from use in lakes or “public ponds”** (Public pond: 10 acres or less with a surface water connection or public access).

Our industry group is still working to push for meaningful changes to NR107, not more burdensome regulations, as the DNR intends. Your support is appreciated.

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From: Tom Lamberg <tplamberg@new.rr.com>
Sent: Thursday, November 4, 2021 2:13 PM
To: Hunter Roose <hunter@casonassociates.com>; tplamberg <tplamberg@new.rr.com>; msole15030 <msole15030@aol.com>
Cc: Chad Cason <chadcason@casonassociates.com>; Lance Paden <lance@casonassociates.com>
Subject: Re: Rule Revisions: WDNR

Hello to all;
Has anyone heard any farther details as to how the DNR is progressing on the elimination of the use of herbicides?

From: Hunter Roose
Sent: Monday, August 16, 2021 5:03 PM
To: tplamberg ; msole15030
Cc: Chad Cason ; Lance Paden
Subject: Rule Revisions: WDNR

Good Afternoon!

In recent years policies dictating aquatic invasive plant management have become stricter, resulting in an increase in declined herbicide treatment permits for cases that would otherwise be permissible under normal circumstances. Currently, the WDNR is undergoing a rule revision for NR107 and NR109, which will create more restrictions on how we can manage aquatic invasive species and have also been prematurely acting on their new revisions that have not been put in place yet. Details on the rule revision and its impacts are outlined in the attached document.

Private firms across Wisconsin, including ourselves, have joined together with an independent party to voice our concerns against this rule revision. However, we need the help of the communities that will be directly impacted by these revisions to make a stand against these unlawful actions. It would be greatly appreciated if you can circulate this document to your lake members, so they have an opportunity to voice their opinion to your local legislator before decisions are made on this new law. Thank you for your time.

Best Regards,

Cason & Associates, LLC

