

These are the points that Cason Associates had with the revisions to 107 and 109 and the responses from Carroll Schaal of the DNR

**Every lake will be required to have a very burdensome management plan prior to a chemical treatment.**

- *A plan is not needed for controlling a new invasive species. A rapid response is generally important to controlling new invasive species but its not that often an emergency.*
- *A plan is not needed to control a localized, unavoidable aquatic plant problem as long as the activity doesn't affect the entire lake. The Department intends to develop best management practices (BMPs) for some control activities that if followed would not require a plan to implement.*

**Permits are much more likely to be denied.**

- *If they wanted to do activity not in a plan, they would have to change the plan first. In general, if permit applications comply with the rule they should be approved.*

**Permits must be submitted electronically through the DNRs system.**

- *The current rule establishes the change from permits being mailed in the USPS to various DNR offices to a central electronic submittal system that is more we feel will be more efficient.*

**The DNR will take even longer to review most permits..**

- *Large-scale activities that have lake wide effects will have a longer review period as will permits in the Ceded Territory of Northern Wisconsin to allow for more thorough review.*
- *The review time has not changed for all other permits. The proposed rule states 21 days while the current rule states 15 business day. Factoring weekend days, the time period is the same.*

**Chemical treatment permits on lakes (except for wetlands) expire by October 15 of the year they are issued.**

- *The current rule requires treatment records to be submitted by Oct. 1 which essentially is a deadline for permitted activities. The proposed rule clearly establishes an expiration date of October 15<sup>th</sup> or 2 weeks longer.*

**Dyes are prohibited from use in lakes or "public ponds".**

Dyes shut down photosynthesis which damages aquatic vegetation and can greatly alter the ecosystem of the body of water involved.