

## **Big Hills Lake Management District**

205 State Street, Ripon, Wisconsin 54971 Lieutenant Colonel (Ret.) Daniel J. Zimmerman, Chairman 920-279-2202 or BigHillsLMD@charter.net

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Department of Natural Resources, Lake Grants Coordinator (ATTN: Ted Johnson), 626 E. County Road Y, Suite 700, Oshkosh, WI 54901

Director, Waushara County Zoning and Land Conservation, 209 S. Saint Marie Street, PO Box 1109, Wautoma, WI 54982-1109

University of Wisconsin Stevens Point, Center for Watershed Science and Education, 800 Reserve St., Stevens Point, WI 54481

Subject: Comments and Recommendations Regarding the Waushara County Comprehensive Lake Planning Process

The Big Hills Lake Management District (BHLMD) board recognizes the value of a comprehensive lake management plan as a planning resource. The BHLMD also appreciates Wisconsin DNR grant support to contract with experts needed to generate the surveys and studies, to lead planning meetings, and to draft the plan – in this case the University of Wisconsin Stevens Point, Center for Watershed Science and Education (UWSP-CWSE).

While the plan UWSP-CWSE produced for us was intended to reflect the interests and needs of the lake community, the planning process UWSP-CWSE employed led to a product that fell far short of our expectations. The BHLMD board is writing to advise the collaborating parties about planning process shortfalls and to provide recommendations intended to ensure that future lake district plans more accurately reflect the goals of individual lakes.

Historically, when lake districts desire to complete a management plan, they individually seek DNR planning grant support and the district hires the experts -- who understand and complement the district's planning vision -- to complete the plan. The county-wide approach attempted to comprehensively create plans for 33 Waushara County lakes. The BHLMD board was not consulted regarding participation in this comprehensive project; DNR grant dollars to support our individual lake planning were diverted to support the comprehensive county-wide project. This alternative process produced a document generating serious reservations by this board and many lake residents. Four points in particular are called to your attention.

1) The governance language in the document suggests that the BHLMD has abdicated to the county and state authorities its statutory responsibilities. This is not the case. Despite what the plan suggests, the BHLMD board notes that no interested party should draw any specific conclusions or discern any directives directly from the approved lake plan.

2) UWSP-CWSE grant proposals refer to developing targeted messaging and employing "behavioral change interventions" commonly used in political campaigns. These manipulative techniques do not belong in a scientific lake planning process. The BHLMD has not participated in any discussions with the plan authors regarding the development of targeted messages. Only the opinions of UWSP-CWSE, the plan authors, are expressed in the plan.

3) The plan lacks statistically significant input from Big Hills Lake residents. Planning meetings were held on weeknights in the winter, all but ensuring minimal participation from an overwhelmingly seasonal lake resident population. Although UWSP-CWSE sent surveys to lake residents, on average only 10 of the 134 lake properties responded. This is in stark contrast to our locally-developed 2010 plan, which included a professional, scientific market survey with responses from 100 of 134 lake properties. Despite being offered the 2010 data to more comprehensively inform the planning process, UWSP-CWSE authors declined to consider this data in drafting the plan. BHLMD has added this data to the plan at Appendix D, but notes that it was not considered by UWSP-CWSE authors.

4) The plan's shoreland survey assessments and conclusions are highly subjective and were made without consultation with those who have detailed knowledge of the lake. As a result, board members and lake residents dispute these observations and have minimal value in the lake planning process.

CONCLUSION: The lack of substantive participation by the BHLMD community in both the development and creation the final plan weakens its current value as a tool for effective planning and lake management. The plan can only effectively serve as a reference to suggest various options under review by the BHLMD board (e.g. methods for controlling invasive aquatic plant species).

RECOMMENDATIONS: For the future, the BHLMD board recommends a return to the original local lakelevel planning process that allows lake districts to select a planning methodology that best suits its particular needs. Returning to this original format will ensure more active and complete participation by the lake community, will produce a plan with broader and stronger lake district support, and result in a much more useful lake-specific plan. Additionally, the board highly encourages all county and state partners to regularly update the various studies included in the plan (water quality, watershed, fisheries, AIS, etc.). These are invaluable to our ongoing lake management efforts and a very sound use of taxpayer funds.

Sincerely,

Daniel J. Zimmerman Chairman