

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
1/01/2019	Paul Mayer	Suggestion for the Education and Awareness portion of the budget: radio advertising. I sometimes listen to a Willmar, MN radio station. During the summer they have radio ads asking people to help stop the spread of invasives in local lakes and also identifying decontamination station locations. Don't know the cost or the efficacy, but it might be something to consider.	Thank you for your comments. The proposed 2019 AIS budget includes \$43,100 dedicated to “education and awareness” efforts. While specific targeted planned purchases and items are mentioned in the budget, there are potential opportunities for radio ads as part of the outreach effort We will consider that as a medium to communicate AIS prevention opportunities. Thank you for the suggestion!	1
1/02/2019	Phillip Rollins	<p>1. We appreciate being allocated the maximum number of hours available for any one lake. With the discovery of ZM's in Bay last summer, the timing and number of inspection coverage hours become even more important.</p> <p>2. I'm pleased to see the continued support for milfoil treatment, water sampling, expanded educational and awareness efforts, and decon.</p> <p>3. The big change looks to be the county taking in house the hiring and scheduling of inspectors. In recent years, we have had the opportunity to pay for inspection hours far in excess of those allocated and paid for by the county. This worked particularly well for us in 2018, with the Rob Wilhelm doing a great job. How will the change affect our ability to secure and pay for additional hours?</p> <p>4. In looking at the list of county lakes, we can only imagine the complications of trying to meet all the county constituent demands. We appreciate the work being done at the county level and look forward to continuing our good working relationship in 2019.</p>	Thank you for your comments. We believe that the change to coordinate the entirety of the watercraft inspection program in-house will positively affect our vital partners – namely lake associations and Lake Improvement Districts (LIDs). First, in short, you should experience no decrease in your ability to secure and pay for additional hours (expanded coverage) assuming adequate availability of inspectors both in terms of total number of inspectors and days-of-the-week availability. Instead of a staffing agency invoicing and taking in money, Crow Wing County will do this instead. Secondly partner costs to support watercraft inspections will be reduced significantly in 2019. In 2018, hiring watercraft inspectors through a third-party staffing agency cost \$19.02/hour for an inspector making \$13/hour (an experienced inspector). In 2019, for an experienced inspector making \$15, the total cost to a partner will be approximately \$16.30/hour. That is a cost reduction of approximately \$2.75 per-hour. For example, if a lake association were to request 200 additional hours of “expanded coverage” inspections, the total savings compared to 2018 is estimated to be \$550.	2

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
			<p>We certainly appreciate the vital role lake associations play in keeping our waters clean and healthy and we look forward to continuing to work with them to further this endeavor.</p>	
1/03/2019	Glenn Olson	<p>I've noticed a reduction of inspection hours on Lower South Long. Why? This lake is not infested with Zebra mussels or milfoil. So why a decrease in hours? We want to protect our lake from invasives and this does not help! We've been having good fishing and I expect a fairly active boat landing this fishing season. So I would hope you would fully support an inspection crew to cover us adequately.</p>	<p>Thank you for your comments. And, thank you for your commitment to helping prevent the spread of AIS in Crow Wing County. You are truly helping make Crow Wing County, "Minnesota's Favorite Place!"</p> <p>In the past, Crow Wing County relied heavily on objective measurements of watercraft traffic coming to and from public boat access landings to partially assign a risk rating and to mostly assign inspection hours. We tracked this data through two sources, 1.) buried boat counters at access landings, and 2.) watercraft inspection data from official DNR-trained watercraft inspection surveys. This data analysis allowed the County to prioritize inspections principally based on the size, infestation status, and overall landing usage by the general public.</p> <p>In 2019, however, we've taken risk analysis to a deeper level by partnering with the University of Minnesota Aquatic Invasive Species Research Center (MAISRC) and the United State Forest Service (USFS). This new model does more than simply rely on infestation status and overall use (traffic) levels. Instead, the model's principle objective is to identify boat landings for the placement of watercraft inspectors that have the potential to do the greatest good in preventing the spread of AIS. To do this, the model took into account specific watercraft movement entering and exiting lakes, AIS introduction probability, establishment probability, and levels of management interventions. As a result of this</p>	3

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
			<p>more robust analysis and modeling, a number of objective information has resulted in South Long Lake landings receiving less overall inspection hours versus 2018. A couple of those reasons is that the data shows that 1.) most boats entering upper and lower South Long Lake landings are coming from Crow Wing County lakes that already have watercraft inspectors assigned to them (therefore inspecting watercraft before they enter uninfested lakes), and 2.) the overall numbers of watercraft entering South Long Lake landings from an infested lake is lower than that of other lakes in Crow Wing County.</p>	
1/6/2019	John Janousek	<p>What a absolutely amazing colossal waste of taxpayer money! I agree that there needs to be continued education on AIS but this is not going to stop the spread! However the waste of time and money spent half assed inspecting boats at landings at times when they are not busy other than weekends does nothing.</p> <p>A full time County staff position? I have several questions on this.</p> <ol style="list-style-type: none"> 1. How will this be filled is it appointed or an elected position? 2. How does one apply for this position? 3. Why does the county feel the need for this position. 	<p>Thank you for your comments. States that have implemented education and inspection programs have significantly slowed or even stopped the spread of AIS. Even if we only slow the spread of AIS, each year they are contained could save citizens tens to hundreds of millions of dollars of taxpayer money. Also, preventing the spread of AIS will protect waters, native wildlife, and fish for many more years while ongoing research develops tools to control these species, particularly at the University of Minnesota Aquatic Invasive Species Research Center (MAISRC).</p> <p>Concerning inspecting boats at landings, as articulated in the proposed in the AIS Prevention Plan, watercraft inspectors will generally be staffed on weekends from mid-May through mid-September from mid-morning through late afternoon. That is because 4+ years of data from 1.) buried boat counters at access landings, and 2.) watercraft inspection data from official DNR-trained watercraft inspection surveys indicates that these times and dates consistently</p>	4

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
			<p>reach the most amount watercraft at the most important times of the year.</p> <p>Concerning the proposed full-time County Environmental Service Specialist position, it will be filled using an open competitive search/announcement position with objective scoring and interviews like most employment opportunities in Crow Wing County. As with all job openings in Crow Wing County, open jobs are posted at the County’s website at www.crowwing.us, then click on “Careers” on the left-hand side.</p> <p>Concerning the need for the position, there are several reasons we felt it was in the best interest of the County to make this change. First, this makes financial sense. The amount of watercraft inspection hours and education and outreach efforts will not decrease overall with the change. Our partners (namely lake associations and LIDs) will see a decrease in their costs for expanded coverage requests from \$19.02/hour to \$16.30/hour for an experienced inspector. Second, we believe this year-round position will increase the overall quality of the inspection program. In the past, the seasonal hiring of this position created high turnover rates and steep learning curves with each new year’s inspector AIS inspector scheduler. Decreasing turnover will allow the person who takes the position the ability to learn and grow with each new year, thus resulting in a greater comprehensive understanding of the program, build upon established partner relationships, and expand education and outreach strategies for AIS prevention. Quality of the program will also be increased by hiring well-vetted candidates</p>	

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
			through the County's well-positioned seasonal job hiring process and by offering an increase by \$2/hr for new and returning inspectors resulting in \$14 and \$15/hour wages.	
1/10/19	Claire Steen	<p>I have reviewed the Crow Wing County AIS Prevention Plan. I have appreciated the inspection help that we have gotten at Upper Hay Lake and hope that we can get 300 hours of inspection in the year 2019.</p> <p>Thank you for all of your help!</p>	Thank you for your comments. Just as it did in 2018, Upper Hay Lake is proposed to receive 300 inspection hours as part of the 2019 AIS Prevention Plan. We appreciate the work of our lake association partners in helping to prevent the spread of AIS in Crow Wing County.	5
1/13/19	Bill Rexine	<p>Item 1: Reference to the "2019 proposal for Inspectors' hours per lake":</p> <p>Proposal indicates 300 hours for Ruth Lake. Based on Penmac T-sheets, in 2018 our actual hours were closer to 897. I realize numbers are estimated for the year but would appreciate a further review to an upward estimate to reflect actual numbers.</p> <p>Item 2: Reference to the \$35,000 Milfoil Treatment Grant:</p> <p>Could the grant be adjusted from Eurasian Water Milfoil treatment to AIS Treatment? This would open up the availability to treat all AIS and not specifically Eurasian Water Milfoil.</p>	Thank you for your comments. The purpose of "Appendix 1" in the proposed 2019 AIS Prevention Plan (the page you refer to) is to articulate the proposed watercraft inspection hours per-lake in 2019 and how those numbers compare to the proposed hours of inspections in 2018. The hours (numbers) are specific to only planned County allocated hours and do not reflect actual hours inspected in the past or any partner added expanded inspection hours. It is a way for the public to better understand an apples-to-apples comparison of where we were and where we are planning to go in terms of the County's planned inspection program. That being said, we certainly recognize and applaud the additional 3,000+ hours of watercraft inspection hours provided for financially through our vital partners, including the 500+ hours of additional watercraft inspections provided for by the Ruth Lake - Lake Improvement District (LID) in 2018. It is through these vital partnerships that Crow Wing County continues to be "Minnesota's Favorite Place!"	6

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
			<p>Concerning the Milfoil treatment grants, EWM was targeted for this grant because of the greatest good it can provide. The finite amount of lakes (11) that are infested with a public access means more resources (up to \$4,000 per-lake) can be allocated to a smaller finite pool of lakes with the goal of complete eradication. If the grant money was expanded to include any AIS treatment, this would make funds available for curly-leaf pondweed and purple loosestrife treatment among others. Because there are many, many more water bodies infested with these AIS in addition to EWM, the available funds per-lake would be minimal compared to that of EWM alone.</p>	
1/21/19	Steve Reilly	<p>I know of 4 lakes with Public access that do not appear on the list included with the plan. Black lake Menomin Lake Partridge Lake Turtle lake (accessible through Partridge) I have not done an exhaustive examination of the lakes listed in the plan, just happen to be familiar with these lakes.</p>	<p>Thank you for your comments. There are approximately 135 public water accesses in Crow Wing County. The proposed AIS Prevention Plan identifies 42 public water accesses to be staffed by watercraft inspectors during high-use times from mid-May through end of September. With finite resources and time, it is impossible to staff all public water accesses. The risk analysis performed in partnership with the University of Minnesota Aquatic Invasive Species Research Center and the United States Forest Service attempted to identify those lakes / landings with the potential to do the greatest good in preventing the spread of AIS in Crow Wing County.</p> <p>Concerning the specific landings you identified, Black Lake is a County administered access site that has only 3 parking spaces and no concrete ramp. Mahnomen Lake is a mine pit lake near Ironton and has no official public water access on it. Partridge Lake is a City managed access site with no parking identified by the MN DNR</p>	7

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
			<p>and no concrete ramp. As you mentioned, Turtle Lake is connected to it. Given those factors and the fact that it did not show up in the risk analysis model results make those landings poor candidates for watercraft inspectors to be stationed there.</p> <p>Other options for AIS awareness and prevention on those landings include active local lake association information and awareness campaigns to lake residents, utilizing County generated AIS awareness materials, awareness signs at the access (with the landing Administrator's permission), and volunteer AIS inspectors trained by the MN DNR. Contact Crow Wing County Land Services at 218-824-1010 for more information.</p>	
1/25/19	The Portage Crooked Lake Association-Kristi Picken	<p>As I am sure you are aware, Milfoil AIS was discovered on the Crooked Lake Chain in the Spring of 2018. With the help of Tim Plude and other DNR staff, as well as many PCLIA volunteer workers, we were able to hand pull much of the infested area. The PCLIA is trying to aggressively move forward to eradicate and prevent further AIS spread and contamination of our chain of lakes.</p> <p>It is our understanding that the Crooked Lake DNR access point will be funded for 300 hours of watercraft inspection staff. It is also our understanding that staff will monitor from mid morning to late afternoon on Friday, Saturday, Sunday and holidays to make sure that boats are clean of invasive species. We are aware that the hours for monitoring the boat launch sites was based on a county wide study. Over this past summer, several PCLIA board members visited the Crooked Lake public access site at various times to monitor boat traffic. Our observations found that much of the boat launch activity at the Crooked Lake Public access site was outside of the hours of service provided by the inspection staff.</p> <p>The PCLIA is concerned that we are missing a large group of people who access our lake earlier and later in the day. Our chain of lakes is frequented by many fishermen as well as fishing tournament groups from the area and they tend to enter the lake</p>	<p>Thank you for your comments. Crow Wing County is grateful and excited to see the passion and dedication of local lake associations making a difference one lake at a time in Crow Wing County. It is good to hear these success stories of early intervention and targeted eradication efforts. We thank you for your continued commitment to preventing the spread of, and managing, AIS in Crow Wing County. In 2019, up to \$4,000 is available for one survey and all treatment of Eurasian Watermilfoil on 11 eligible lakes in Crow Wing County.</p> <p>Concerning hours of County allocated watercraft inspections, the 2019 AIS Prevention Plan proposes 300 hours of inspection for Crooked / Portage Lake, just as it did in 2018. For 300 hour lakes, they will planned to be staffed Saturdays and Sundays and holidays, from mid-May through the end of September and from</p>	8

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
		<p>earlier for early morning fishing and later in the day for evening fishing. Many fisherman go from lake to lake and this puts our lakes at greater risk of further infestation of AIS.</p> <p>The PCLIA would like to propose that we try to capture more of the early and later hours when people are accessing our lakes. We are hoping with the new practice of the county hiring, training and managing the staff that this will go smoothly rather than the prior practice of using a temp agency. In the past we have received feedback from property owners that at times the landing was not staffed on Friday, Saturday and Sunday. Property owners would find the landing staffed other days of the week, such as a Wednesday, rather than the proposed days and times.</p> <p>Please let us know if our request can be accommodated and if we can assist in any way. Please call if you have any questions.</p>	<p>9:00am to 5:00pm. This would have been the same plan for 300-hour lakes in 2018 as well.</p> <p>Crow Wing County makes a concerted effort to maximize the effectiveness and utility of watercraft inspections by staffing landings when they are busiest seasonally (summer vs. fall), weekly (weekends vs. weekdays), and daily (daytime vs. nighttime). By analyzing data from boat counters located at 26 public accesses and performing over 70,000 hours of inspections since 2015, we believe that overall, inspections that occur from mid-morning through late afternoon and on weekends achieves the goal of inspecting the most watercraft and educating the most people with limited resources. Therefore, when we look at the inspections per-hour data, we know that on the whole, it's reflecting peak landing usage potential.</p> <p>Concerning time of day, Crow Wing County's experience has been that even if there is a momentary or isolated "spike" in watercraft access usage by early morning or late evening users or periodic fishing tournaments or leagues, on the whole, the most amount of watercraft traffic is occurring from mid-morning through late afternoon and on weekends from late spring through early fall. That being said, Crow Wing County is always looking to improve and refine its programs to make sure AIS is being effectively prevented from spreading. If you have information about a particular isolated and significant event occurring on a lake that we are staffing (i.e., official fishing tournament), please let us know with as much advance notice as possible and we will make reasonable attempts</p>	

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
			<p>to consider changes watercraft inspector schedules for a particular day or weekend.</p> <p>Concerning the particulars of planned times versus actual staffed times, there are a number of reasons why a lake may not be staffed at the planned times and days. We prioritize staffing the highest hour-allocated lakes first and then as watercraft inspectors become available through the hiring process (i.e., we would like approximately 50) we staff 300 hour lakes, then 100 hour lakes. This matches up with making sure the highest risk lakes are staffed first as a priority. There may be times when, if watercraft inspector supply is short compared to available landings, those less-hour lakes may not be staffed right away. Or, sometimes, watercraft inspectors miss a shift due to an unforeseen event or otherwise, thus creating a gap in coverage. Or, in other cases, there may not be a watercraft inspector available to geographically work a particular landing because of driving distance, etc. When these events happen, the lake is staffed later in the fall to make sure the allocated hours are covered (i.e., going past September into October) on the weekends. In some cases, when it becomes apparent that even going later in the fall will not fulfill the County allocated hours, a decision is made to schedule inspectors at the next-highest traffic days of the week that is not a weekend day to ensure coverage. On a 300-hour lake, that would typically mean going to a Friday or Monday, or even Thursday if necessary.</p>	
1/25/19	Doug & Kris Picken	As I am sure you are aware, Milfoil AIS was discovered on the Crooked Lake Chain in the Spring of 2018.	Thank you for your comments. See the staff response to comment #8, above. If you have information about a particular isolated and significant event occurring on a lake that we are	9

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
		<p>It is our understanding that the Crooked Lake DNR access point will be funded for 300 hours of watercraft inspection staff. It is also our understanding that staff will monitor from mid morning to late afternoon on Friday, Saturday, Sunday and holidays to make sure that boats are clean of invasive species. We are aware that the hours for monitoring the boat launch sites was based on a county wide study.</p> <p>We are concerned that we are missing a large group of people who access our lake earlier and later in the day. Our chain of lakes is frequented by many fishermen as well as fishing tournament groups from the area and they tend to enter the lake earlier for early morning fishing and later in the day for evening fishing. Many fisherman go from lake to lake and this puts our lakes at greater risk of further infestation of AIS. We would like to propose that we try to capture more of the early and later hours when people are accessing our lakes</p>	<p>staffing (i.e., official fishing tournament), please let us know with as much advance notice as possible and we will make reasonable attempts to consider changes watercraft inspector schedules for a particular day or weekend.</p>	
1/18/19	Susan Koering	<p>As President of the Pelican Lakes Association I have noted in the county's 2019 AIS plan that funds have been eliminated for the decontamination unit at Pelican Square.</p> <p>Per Consultation with David Slipy and Art Weaver it was shared that the Ruth Lake (623 acres) Association purchased a decontamination unit a couple of years ago and is receiving funding from the county. Pelican Lakes (8870 acres) had purchased a decontamination unit (without county assistance) two years ago and is now receiving no funding for 2019. In 2017, Justin at Pelican Square uploaded the hours utilized on the program "Harvest your Data" and the number of boats cleaned to the DNR. The DNR said they did not receive the hours. In 2018 there was some significant downtime related to equipment malfunction; however, once again all boats cleaned were not tabulated. The DNR did not allow Pelican Square employees to decontaminate boats and our level two inspectors were at the landings and unavailable on many occasions. The County should at the very least provide for 100 hours with the provision to increase the hours above 100 during the summer as needed. Pelican is not the only lake using this unit as we do know Lake Kimble and other smaller lakes in the area have boats decontaminated at Pelican Square. The decision is unfortunate and needs to be corrected.</p>	<p>Thank you for your comments. Crow Wing County applauds the efforts of the Pelican Lakes Association for their innovative approaches to preventing the spread of AIS in Crow Wing County. Having the City of Breezy Point sign a delegation agreement with the Minnesota DNR means the City and the Pelican Lakes Association are all-in with their inspection program. Furthering those efforts by partnering with a local business (Pelican Square) to decontaminate watercraft at a local gas station, convenience store, and car wash is both innovative and creative. That being said, we took a look at the data for both of the years that Crow Wing County provided financial assistance to provide 200 hours of level II inspections at Pelican Square. In 2017, there were no decontamination inspections reported by the MN DNR's inspection data and some the money was instead spent on watercraft inspections on Pelican Lake landings. In 2018, after lessons learned from 2017, the MN DNR's</p>	10

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
			inspection data showed only seven (7) decontamination inspections performed over a total of 59 hours even though Crow Wing County provided 200 hours of financial assistance. That amounts to approximately 0.12 inspections per-hour or less than one decontamination per 8-hour day. The rest of the hours were spent on training and watercraft inspections on Pelican Lake landings instead. Two years' worth of data and reflection has made it apparent that financially supporting the Pelican Lake decontamination station at any level, at this time, is not prudent until we see increased awareness and use of the station versus the current use and operation patterns.	
1/30/19	Jim Rusch	<p>The 2019 proposed plan makes major changes to the overall Crow Wing County approach to AIS prevention risk assessment. It appears that the monitoring element of the plan is solely focused on reaching the maximum number of watercraft operators with an emphasis on zebra mussels versus other species. The plan also relies heavily on MAISRC risk assessment for zebra mussels while ignoring MAISRC's assessment of starry stonewort.</p> <p>Over the past 3 years, Kimble Lake has spent over \$30,000 and 1000 volunteer hours for access monitoring, EWM surveys / treatment, public education and training. In that same time, we have seen the County's contributions to Kimble for these activities reduced to a small fraction of what they were previously even though our residents' property tax payments have increased. It no longer feels like this is a partnership with the County but is a plan for the County to prioritize large lakes over smaller ones. We believe the proposed plan is not appropriate because of the following:</p> <ol style="list-style-type: none"> 1. With the weighting to ZM in the plan, it does not give higher weighting to those lakes already infested with ZM and preventing them from being transported away from those lakes. 2. Kimble lake is one of five zebra mussel infected lakes in the County not receiving any support from the County for access monitoring per the preliminary plan. Kimble is the only one of these five also infected with EWM. 	<p>Thank you for your comments. Crow Wing County appreciates the vital role lake associations and LIDs play in preventing the spread of AIS in Crow Wing County. Over the past several years, they have financially provided for tens of thousands of hours of additional watercraft inspection hours, participated in the volunteer DNR trained inspection program, enrolled members in the AIS detector program, and continue to advocate for and promote AIS prevention strategies to their members and the broader community.</p> <p>Crow Wing County believes that one of the greatest assets that makes it "Minnesota's Favorite Place" is the water; namely the over 500 water bodies within it and the economic, social, and ecological benefits they provide. It is for this reason that the County partnered with MAISRC and the USFS to come up with a model for preventing the spread of AIS to Crow</p>	11

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
		<p>3. Kimble Lake has demonstrated that it is at real risk for early AIS introduction. It was among the earliest infestation of EWM in the County and ZM came just a few years after this became more widespread. There is no reason to believe that the newer AIS that are in early spreading phase (Starry and Spiny) won't show up in Kimble in the near future just like EWM and ZM since we have a large amount of traffic from the Metro area and lakes around the state.</p> <p>4. The plan ignores that there are connected and uninfested lakes to Kimble that are at higher risk of becoming infested without access monitoring.</p> <p>5. The plan fails to fund the Pelican Lake decontamination station. This station is the closest one to Kimble and we routinely send watercraft to this station.</p> <p>We request that the County modify the preliminary plan to:</p> <ol style="list-style-type: none"> 1. Weight other AIS species beyond ZM 2. Allocate hours to all ZM infested lakes 3. Fund the Breezy Point decontamination station 	<p>Wing County water bodies through strategic locations of watercraft inspectors. While preventing the spread of all AIS is vitally important, the Minnesota DNR's data shows that one of the fastest spreading AIS species in Minnesota is zebra mussels. When watercraft inspectors are stationed at public accesses derived from zebra mussel risk, they are also inspecting watercraft for all other AIS species including plant fragments important to Starry stonewort spreading. That is why the Prevention Plan also includes an overall risk analysis for zebra mussel introduction to all water bodies in Crow Wing County by 2025. This new model does more than simply rely on infestation status and overall use (traffic) levels. Instead, the model's principle objective is to identify boat landings for the placement of watercraft inspectors that have the potential to do the greatest good in preventing the spread of AIS. To do this, the model took into account specific watercraft movement entering and exiting lakes, AIS introduction probability, establishment probability, and levels of management interventions.</p> <p>Kimble Lake was not identified in the model's results as one of the top 30 public landings in Crow Wing County to staff a watercraft inspector due to one or more objective reasons based on model input and criteria as summarized above. Even when adding an additional 12 landings based on access usage rates, Kimble Lake was not identified as a lake for consideration of watercraft inspections. The</p>	

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
			<p>average watercraft inspections per-hour on Kimble Lake in 2018 was 0.9 and over the last 3 years averaged 0.52 inspections per-hour.</p> <p>Concerning the Breezy Point decontamination station, see staff responses to comment #10, above.</p>	
1/30/19	Bob Stancer	<p>The FLPOA Board is asking the county to increase the allocation of 300 hours of AIS inspection hours to the five lakes and four public watercraft landings in the City of Fifty Lakes. In 2016 and 2017, 800 hours were allocated each year. The proposed 2019 AIS Plan has 300 hours for just the East Fox Lake Landing. In 2018 the FLPOA and the property owners in the city spent \$10,043.00 to buy 528 hours of inspector time to provide AIS inspectors at the other three public landings. Those landings are located on Eagle, Kego and Mitchell Lakes.</p> <p>To date none of the five lakes in Fifty Lakes are infested with AIS. But, DNR designated AIS infested lakes surround the entire city of Fifty lakes.</p> <ul style="list-style-type: none"> • 2 to 3 miles north of the city both Washburn and Roosevelt Lakes are infested with Eurasian Water Milfoil (EM). • 4 to 5 miles east Emily, Mary and Ruth are infested with (EM) and Ruth is also infested with Zebra Mussels (ZM). • 2 to 3 miles south and west of the city the entire Whitefish Chain is infested with ZM. <p>Reasons for requesting addition inspection hours for the other three landing in the city:</p> <ol style="list-style-type: none"> 1. Close proximity to AIS infested lakes. The Minnesota AIS Research Center (MAISRC) has said that landing inspections are one of the most important things that can be done to prevent the spread of AIS. The MAISRC also has said that in many cases Zebra Mussels are spread from one lake to another by local boat hoppers that move from one lake to another. 	<p>Thank you for your comments. Crow Wing County appreciates the vital role lake associations and LIDs play in preventing the spread of AIS in Crow Wing County. Over the past several years, they have financially provided for tens of thousands of hours of additional watercraft inspection hours, participated in the volunteer DNR trained inspection program, enrolled members in the AIS detector program, and continue to advocate for and promote AIS prevention strategies to their members and the broader community</p> <p>Concerning watercraft inspection hours, the basis for the allocation as the results of a partnership between the County, the MAISRC, and the USFS as described in staff response to comment #11, above. The model predicts coverage of at least 85% of watercraft moving from infested to uninfested water bodies. The results also showed that best prioritization of landings will be achieved when inspecting zebra mussel infested lakes with a lot of boat traffic and zebra mussel uninfested lakes with a lot of incoming traffic from out of the county. To further improve coverage and further prevent the spread of AIS, the County added 12 additional landings not identified in the model, based</p>	12

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
		<p>2. Increased in the number of watercraft traffic and inspections in 2018. The data below reflects the total number of watercraft inspected and the total number inspection hours for each year at all four landings in the city. 2018 1081-inspected/827.10 hours = 1.31 average WC per hour. 2017 679-inspected/795.25 hours = 0.85 average WC per hour. 2016 661-inspected/790.75 hours = 0.84 average WC per hour.</p> <p>3. Two of our landings have a 3-year average above 1.0 watercraft per hour. East Fox has averaged 1.18 watercraft/hour and Kego has averaged 1.10 watercraft/hour.</p> <p>4. Four lakes in the city are listed in the top 30 of lakes named in Appendix 2: 2019 AIS Risk Model, Crow Wing County. This model was developed by the MAISRC and predicts % chance of Zebra Mussel infestation by 2025. The MAISRC has identified over 700 water bodies in Crow Wing County. This is the percent chance for the four lakes in Fifty Lakes; Kego 16.95%, East Fox 14.75%, Eagle 14.34% and Mitchell 14.13%.</p> <p>5. Another reason the association is requesting additional hours, is the role of an inspector at the landing. The association understands that role to be the first line of prevention and enforcement. But, education is probably the most important. The inspector has an opportunity to work one-on-one with the watercraft owner, to explain and demonstrate the expectations of the AIS prevention program.</p> <p>Comments:</p> <p>1. Request to assist or schedule inspectors at the landings in Fifty Lakes. The FLPOA would like to be able to make recommendations at the landings where the county has control of the schedule. In 2018 the county set the schedule for the East Fox Lake Landing for the season. We attempted to make suggestions to vary the schedule with regards to times and were told that the schedule would stay as scheduled – no changes. The association has been scheduling inspectors at landings since 2014 with the exception of 2016 and 2017 when the county did the entire schedule. The association schedules inspectors based on past years data, experience, local knowledge and input from inspectors that have worked our landings. In 2018 the association scheduled the inspector at Kego Lake. The county did the scheduling at Kego in 2016 and 2017. The following reflects the total watercraft inspected, the inspection hours and number per hour average for the year. Local control of the</p>	<p>on high-use landings.</p> <p>Not one of the public boat access landings in the City of Fifty Lakes was identified in the model’s results due to model input results as described above. When the County added an additional 12 landings based on overall usage patterns, only then was East Fox landing added to the list due to its high-use pattern. Although 2018’s average inspections per-hour patterns were higher overall on landings within the City of Fifty Lakes, the County utilized 3-year average statistics (2016-2018) in order to account for overall longer-term trend patterns.</p> <p>Concerning “Appendix 2” identified in the Prevention Plan compared to the watercraft inspection model identified earlier in the Plan, the two models serve two different purposes. The MAISRC risk model (“Nick’s model”) in Appendix 2 only accounts for the <i>risk of introduction</i> and does not consider currently infested lakes. This is perhaps more useful for surveillance and early detection: This alone does not solve the inspection question, which is where the USFS model comes in. That model uses a different type of model that includes boat movement <i>exiting</i> and <i>entering</i> and generally comes to the conclusion the most efficient protection comes from positioning inspectors at currently infested lakes. For the purpose of locating inspection stations, the USFS model is more robust in that regard. Again, the two models have different purposes, both beneficial.</p>	

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
		<p>schedule in 2018 reflected almost double the watercraft inspected using about the same amount of hours. 2016 - 164 WC inspected/185 hours = 0.89 average WC per hour. 2017 - 155 WC inspected/200 hours = 0.78 average WC per year. 2018 - 317 WC inspected/192.5 hours = 1.65 average WC per Year.</p> <p>2. The association is not in favor of spending \$64,700.00 to hire an Environmental Service Supervisor using state AIS funds. In the four-page job description of the position, AIS is only mentioned once. Part or all of that money should be spent hiring AIS inspectors, to cover some of the 180 plus water bodies in the county. The proposed 2019 CW County AIS Plan calls for manning only 42 landings. The main focus of Minnesota State Statute 477A.19 Aquatic Invasive Species Prevention Aid is prevention and/or limiting the spread of AIS and the best way to make that happen is manning landings with AIS inspectors.</p> <p>3. With all the responsibilities the County Land Services Department has, maybe the Crow Wing Soil and Conservation District would be a better choice to administer the County AIS Program. Their mission better matches the mission of lake associations.</p>	<p>Concerning scheduling inspectors, Crow Wing County makes a concerted effort to maximize the effectiveness and utility of watercraft inspections by staffing landings when they are busiest seasonally (summer vs. fall), weekly (weekends vs. weekdays), and daily (daytime vs. nighttime). By analyzing data from boat counters located at 26 public accesses and performing over 70,000 hours of inspections since 2015, we believe that overall, inspections that occur from mid-morning through late afternoon and on weekends achieves the goal of inspecting the most watercraft and educating the most people with limited resources. Therefore, when we look at the inspections per-hour data, we know that on the whole, it's reflecting peak landing usage potential.</p> <p>We also recognize that some lakes have specific and sometimes complex AIS protection needs. In order to better meet those challenges, the 2019 AIS Plan offers local lake associations the option to partner with local government units (LGUs) to receive local AIS aid monies directly from the County's watercraft inspections and decontaminations that is 100% administered by the LGU, rather than the County. In this way, lake associations can coordinate with other LGUs to meet their own particular needs.</p> <p>Concerning the hiring of a full-time Environmental Services Specialist (ESS) to coordinate Crow Wing County's AIS program, the job description of the position is the same for all of County's ESSs. To be clear, the intention and focus of the person who takes the position</p>	

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
			<p>will be principally for AIS prevention and management and all water planning and water quality duties as assigned. That does not mean, however, that where opportunities present themselves, the person may not be asked to perform other duties as assigned including and not limited to land use permitting, forest resource management, and etc.</p> <p>Concerning which organization or agency is best suited to administer the County's AIS program, that is a decision for policy makers (County Board). At this time, Crow Wing County administers AIS prevention efforts as a partner to the MN DNR's overall program.</p>	
1/30/19	Anthony Coffey, Thomas Watson, Susan Koering, Chuck Herring, Steve Curry, Phillip Rollins, Bob Stancer, Jim Rusch, Mary Erdman, Nick Bernier, Sue	<p>On behalf of the Board of Directors of the undersigned lake and property owners associations located in Crow Wing County, we offer comments, suggestions and recommendations regarding the 2019 Crow Wing County Aquatic Invasive Species Prevention Plan (AIS Plan). Our Northern Crow Wing Coalition of Lake Associations has provided input and suggestions to the County each year since 2015 and remains fully committed to AIS prevention and control.</p> <p>Fundamentally, preventing and controlling the spread of the numerous species of non-native aquatic invasive (AIS) in our public waters is our primary focus. Our comments for this proposed 2019 County Plan are directed at suggestions and recommendations to address the risks to the local economy and water quality associated with the threats from the invasion of more species of non-native aquatic plants and animals, and further spread of presently identified AIS in our area. This letter addresses the following key points for County consideration for approval of the 2019 County AIS Plan:</p> <ul style="list-style-type: none"> • Aquatic Invasive Species (AIS) is a growing problem with more species nearby 	<p>Thank you for your comments. The adverse impacts of AIS on water bodies has been intensely studied and documented. In addition to the severe and permanent damage to the habitats they invade, AIS also adversely effects recreational and commercial activities and decreases the aesthetic value of nature. Crow Wing County shares your same concern about controlling the spread of AIS on public waters.</p> <p>Concerning public accesses as it relates to funding, the 102 number you refer to that resulted in \$443,109 being allocated to Crow Wing County for AIS prevention is based 50% on the number of public "watercraft trailer launches" and 50% on watercraft trailer parking spaces according to the Minnesota Department of Revenue. Those accesses are administered by</p>	13

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
	Manchester, Don Majsterski, Mike O'Brien	<ul style="list-style-type: none"> • MAISRC is conducting research on 10 different species; evidence of a growing challenge for our lakes • State aid and grant funding for AIS prevention and control has decreased in Crow Wing County as the State changes aid calculations and eliminates grant programs • Lake associations are hoping to create a “partnership” and work more effectively with Crow Wing County to improve AIS prevention, spread and public information • Lake associations continue to make significant financial contributions on AIS prevention and control, public information and support for MAISRC research <p>While we are primarily focused presently on zebra mussels and Eurasian watermilfoil in our area lakes, the University of Minnesota Aquatic Invasive Species Research Center (MAISRC) researchers are currently conducting research on ten (10) species, including: zebra mussels, spiny waterflea, Asian carp, common carp, heterosporosis, viral hemorrhagic septicemia virus, Eurasian watermilfoil, starry stonewort, curlyleaf pondweed, and phragmites. We have starry stonewort, curlyleaf pondweed, and spiny waterflea in neighboring counties, along with rusty crawfish. In other words, “our water world” could get worse with additional infestations of non-native AIS. To stop the new introduction and/or further spread of AIS is our “shared” challenge.</p> <p><u>“Economic Significance” of Managing Water Quality and AIS</u></p> <p>The “economic significance” of managing water quality and AIS for our northern Crow Wing County lakes area and throughout the County is a real factor. The property tax and economic data in the following table states the importance and growing magnitude of “quality” water as a destination for visitors, tourists, second homeowners, and small businesses with seasonal residential property accounting for nearly fifty (50%) percent and seasonal commercial property accounting for nearly 28 percent (28%) of “like type” values throughout Crow Wing County:</p>	<p>an entity (i.e., federal, state, county, city, etc.) and are capable of supporting a trailer down a ramp. That list does not include private or carry-in only accesses. The 102 number is “public accesses” but with the caveat of no carry-in or non-trailer accesses. The 182 number included in the proposed 2018 AIS Prevention Plan (last year’s plan) is a list of known public and private accesses including carry-ins. In the past, Crow Wing County participated in making sure the public information (i.e, parking spaces, etc.) on landings administered by Crow Wing County are accurate. The Minnesota DNR checks its own watercraft access sites to ensure accuracy. In the future, Crow Wing County will work with partners to pro-actively identify parking space estimates on public accesses administered by other entities in the County and report that information to the State of Minnesota. In the</p> <p>Concerning the County’s watercraft inspection program, Crow Wing County performs the most hours (16,600 proposed) and most landings (42 proposed) of watercraft inspections in the region. 75% of the proposed AIS Prevention Plan budget is allocated to the watercraft inspection program. Funding additional inspection hours with other sources of money beyond the State’s local county aid monies (i.e., local levy dollars) is a policy decision left to elected officials to make (i.e., County board).</p> <p>Concerning watercraft inspector wages, we believed that raising wages by \$1/hour in 2018 and then again by \$1/hour in 2019 would be a market competitive wage that will attract good, quality inspectors. That being said, we will agree to raise the wage an additional \$1/hr in</p>	

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

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		<p style="text-align: center;"><i>Economic Market Value for Cities and Counties. Assessment Year 2015 for taxes payable in 2016</i> COMBINED - Timothy, Jenkins, Ideal, 50 Lakes, Man Beach, Crosslake, Mission & Pelican</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 10px;"> <thead> <tr> <th style="width: 10%;"></th> <th style="width: 20%;"><u>Property Type Name</u></th> <th style="width: 15%;"><u>Estimated Market Value (a)</u></th> <th style="width: 10%;"><u>Calculated sales ratio (b)</u></th> <th style="width: 15%;"><u>Economic Market Value (c)=(a)/(b)</u></th> <th style="width: 10%;"><u>Total</u></th> <th style="width: 10%;"><u>% of CWC</u></th> </tr> </thead> <tbody> <tr> <td>01</td> <td>Residential</td> <td>\$879,833,600</td> <td>30.18%</td> <td>\$918,805,603</td> <td>29.5%</td> <td>20.0%</td> </tr> <tr> <td>03</td> <td>Non-Comm'l Seas Resid Rec</td> <td>\$1,833,722,600</td> <td>62.91%</td> <td>\$1,987,612,630</td> <td>63.9%</td> <td>49.5%</td> </tr> <tr> <td>06</td> <td>Commercial</td> <td>\$61,493,100</td> <td>2.11%</td> <td>\$61,882,963</td> <td>2.0%</td> <td>8.1%</td> </tr> <tr> <td>14</td> <td>Commercial Seasonal Rec</td> <td>\$29,982,000</td> <td>1.03%</td> <td>\$29,982,000</td> <td>1.0%</td> <td>27.8%</td> </tr> <tr> <td>97</td> <td>Total Agriculture</td> <td>\$93,681,600</td> <td>3.21%</td> <td>\$97,049,207</td> <td>3.1%</td> <td>14.0%</td> </tr> <tr> <td></td> <td>Other</td> <td>\$16,112,967</td> <td>0.55%</td> <td>\$16,153,910</td> <td>0.5%</td> <td>7.7%</td> </tr> <tr> <td></td> <td style="text-align: center;">Total</td> <td style="text-align: right;">\$2,914,825,867</td> <td style="text-align: center;">100.00%</td> <td style="text-align: right;">\$3,111,486,313</td> <td style="text-align: center;">100.0%</td> <td style="text-align: center;">29.8%</td> </tr> </tbody> </table> <p style="text-align: center;"><i>Source: MN Revenue; Research & Reports; Annual Statistics</i></p> <p>Please note that the above table includes eight (8) local units of government (LGU) and does not include the Bay Lake, South Long Lake, and the County portion of Gull Lake associations, who are Coalition members. With the additional LGU data, the significance is even greater.</p> <p><u>Minnesota AIS Prevention Aid (2014 enactment)</u></p> <p>As you know, the 2014 Minnesota Legislature enacted legislation that appropriated \$4.5 million for 2014 and \$10 million for 2015 and annually thereafter solely to prevent the introduction or limit the spread of aquatic invasive species (AIS) in our public waters. As a reminder of the state law authorizing this AIS Prevention Aid, the “. . . county that receives a distribution under this section [MN Stat. 2016, Section 477A.19] <u>must use the proceeds solely to prevent the introduction or limit the spread of aquatic invasive species at all access sites within the county</u>”. [emphasis added]</p> <p>This annual appropriation is made to the Commissioner of Revenue who is required to confirm the quantities of public accesses and parking sites at those same accesses. The Commissioner has provided those quantities and the 2019 projected state aid amount for Crow Wing County AIS prevention is \$443,109, based fifty (50%) percent on 102 public accesses (launch) and the other fifty (50%) percent on 923 public access parking spaces in Crow Wing County. This is an increase of \$354 compared to the 2018 AIS state aid amount of \$442,755. It is solely the result of Crow Wing County quantities having been unchanged in recent years and other counties receiving more state aids due to annually reporting more parking and public accesses.</p>		<u>Property Type Name</u>	<u>Estimated Market Value (a)</u>	<u>Calculated sales ratio (b)</u>	<u>Economic Market Value (c)=(a)/(b)</u>	<u>Total</u>	<u>% of CWC</u>	01	Residential	\$879,833,600	30.18%	\$918,805,603	29.5%	20.0%	03	Non-Comm'l Seas Resid Rec	\$1,833,722,600	62.91%	\$1,987,612,630	63.9%	49.5%	06	Commercial	\$61,493,100	2.11%	\$61,882,963	2.0%	8.1%	14	Commercial Seasonal Rec	\$29,982,000	1.03%	\$29,982,000	1.0%	27.8%	97	Total Agriculture	\$93,681,600	3.21%	\$97,049,207	3.1%	14.0%		Other	\$16,112,967	0.55%	\$16,153,910	0.5%	7.7%		Total	\$2,914,825,867	100.00%	\$3,111,486,313	100.0%	29.8%	<p>2019 so that the starting wage will be \$14/hr and a returning inspector wage will be \$15/hr. That represents an increase of \$2/hr for an inspector wage versus 2018. Each year, we look at market conditions and determine whether or not the wage is market competitive and adjust accordingly.</p> <p>Concerning the location of public landings for inspection hours, the basis for the allocation of those hours is the result of a partnership between the County, the MAISRC, and the USFS as described in staff response to comment #11, above. The model predicts coverage of at least 85% of watercraft moving from infested to uninfested water bodies. The results also showed that best prioritization of landings will be achieved when inspecting zebra mussel infested lakes with a lot of boat traffic and zebra mussel uninfested lakes with a lot of incoming traffic from out of the county. To further improve coverage and further prevent the spread of AIS, the County added 12 additional landings not identified in the model, based on high-use landings. In total, we believe this approach will effectively assist with preventing the spread of AIS while educating the most amount of people at those landings.</p> <p>Concerning the proposed full-time County Environmental Service Specialist (ESS) position, we are certainly able to provide you with the position description. It will be the same position description as the other ESS positions in the County.</p>	
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2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date Name Comments Staff Comments #

- *We encourage the County to confirm, with lake association assistance, the number of public accesses and parking spaces to ensure accuracy. In the 2017 County Plan, a total “landings” of 183 was included, whereas the County reports 102 public accesses for state aid purposes.*

We reviewed the proposed 2019 County AIS Plan and analyzed the 2019 budget with comparisons to estimated/actual and approved budget 2018, and actual 2016 and 2015 as show in the following table:

	<u>Proposed 2019 Bud</u>	<u>2018 Est/Act**</u>	<u>Proposed 2018 Bud</u>	<u>2017 Est/Act***</u>	<u>Final 2017 Budget</u>	<u>2016 Est/Act</u>	<u>2015 Proj Act</u>
Inspections	\$286,393	\$339,510	\$352,868	\$316,413	\$314,951	\$337,948	\$276,000
* County staff	64,407	17,520	17,520	28,500	41,445	<i>td</i>	\$54,000
* County hiring	10,000	0	0	0	0	0	0
Decontamination	16,056	23,166	26,100	24,986	26,500	6,877	50,000
Education/training	34,100	15,884	20,500	13,259	16,500	41,892	43,000
Milfoil treatment	35,000	29,785	40,000	30,539	45,000	0	0
Other services	<u>2,000</u>	<u>1,760</u>	<u>2,500</u>	<u>2,160</u>	<u>9,000</u>	<u>51,664</u>	<u>54,000</u>
Subtotal; Direct svcs	\$447,956	\$427,625	\$459,488	\$415,857	\$453,396	\$438,381	\$477,000
Multi-county initvs	<u>9,000</u>	<u>24,000</u>	<u>24,000</u>	<u>20,000</u>	<u>35,000</u>	<i>td</i>	<i>td</i>
Total	\$456,956	\$451,625	\$483,488	\$435,857	\$488,396	\$438,381	\$477,000

* county staff and services costs identified as a separate line item
 ** as of 1/2019 *** as of 11/17

Based on our January 19th work session with representatives of the undersigned lake associations, we offer the comments, suggestions and recommendations below for improving the 2019 AIS Plan:

1. Adopt a more effective Plan. *As we face the imminent threat of the introduction of new AIS species and the further spread of present AIS species, we request that County Board ~~must~~ adopt a more effective Plan with improved funding and more direct program services to be provided in 2019 considering the suggestions we have made in this letter.*

Concerning monies budgeted for “HR coordination and facilitation”, that is the projected amount of money staff estimated would take to advertise, market, and promote the watercraft inspector position to the broader market including advertisements, online resources, brochures, etc. It also includes monies to pay for background checks, drug testing, and other necessary costs as part of the hiring process. As with any plan, we will take a look at actual expenses at the end of each year to determine if that budget estimate is appropriate for future years.

Concerning the County’s AIS newsletter sent to all riparian property owners each year (folks who own property on a public lake or river in Crow Wing County), we are prepared to offer alternative formats and messaging in collaboration with our partners to divert financial resources away from the newsletter and re-commit those monies towards increasing inspector wages, for example.

Concerning decontamination, Crow Wing County follows Minnesota state statutes concerning when a decontamination is required. We will continue to follow the current protocol. In 2016, we switched from having the Crosslake decontamination station fully staffed 7 days per-week to on-call only during the weekdays and fully staffed Friday thru Sunday. We did receive informal feedback in 2018 concerning the availability of decontamination on Mondays. As a result, in 2019, we are proposing to staff the decontamination station in Crosslake an additional day so that it is fully staffed Friday through Monday and close on Tuesdays through

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
		<p>2. <u>Increase inspection hours.</u> We understand that the 2019 County AIS Plan has 16,600 inspection hours budgeted in the Plan, which remains <u>unchanged</u> from the 2018 Plan and decreased from the 16,900 hours budgeted in the 2017 Plan.</p> <p>3. <u>Increase the funding for watercraft inspections and education.</u> The County must increase the allocation by at least \$50,000 for watercraft inspections and education funded with “local property tax levy” dollars that would add watercraft inspection hours and “water-focused” direct education services, public information and materials, which is the fundamental intent of Laws 2014, Chapter 308, considering:</p> <ul style="list-style-type: none"> a. <u>Increase inspection hours with an increased hourly wage.</u> Based on the proposed higher “veteran” inspector wage and 4,150 hours or 25% increase, which would be a projected cost of \$67,645. b. <u>Increase the inspector wage to a more “marketable” hourly wage, such as at least \$15.00 per hour for our “seasoned” inspectors and \$13.00 per hour starting, which would be comparable to Hubbard County 2019 Plan and other semi-skilled summer jobs in the area.</u> With payroll taxes and costs, the higher wage would cost \$16.30 per hour, which is a savings of \$2.72 per hour from ERC/Penmac. c. <u>Reconsider adding watercraft inspection hours for lakes neighboring “very high risk” lakes in our area, which according to MAISRC research is the highest probability “vector” for AIS transfer.</u> d. <u>Fund the new County AIS position and operating costs from the County General Fund.</u> We support the new position as proposed. Funding the position from the County General Fund can “free-up” these funds (\$64,407) for inspection, decon and public information direct services. The \$10,000 for County hiring services should remain <u>only</u> if there are actual added costs of County Human Resources and payroll. <ul style="list-style-type: none"> i. We are interested in reviewing the proposed job description for the new position and complete in consultation with the interested lake associations. e. <u>Use the County’s “target marketing” and AIS Newsletter funds more efficiently, effectively.</u> Several of our lake associations in the County, 	<p>Thursdays. We will certainly continue to analyze usage patterns moving forward and make changes to the hours of operation as necessary to achieve maximum effectiveness. Additionally, we will establish communication and relationships with state and local fishing organizations / clubs to make them more aware of decontamination places, the benefits of, and potentially work with the MN DNR to have portable decontamination units available at special locations for large tournaments.</p> <p>Concerning alternative forms of watercraft inspections, Crow Wing County is aware of the “regional inspection program” that was piloted on 3 lakes in Wright County for 21 days in October, 2017, and then for the entirety of the season in 2018. We will continue to monitor the financial, logistical, user feedback, and overall success of the program to determine if such a program is a good fit for Crow Wing County in the future.</p> <p>Concerning a potential change of location of the Crosslake decontamination station, the Crow Wing County Land Services Supervisor met with Supervisory Park Ranger Carrine Hodapp of the US Army Corps of Engineers (USACOE) in the summer of 2016 to discuss a proposed relocation of the existing Crosslake decontamination station. We were told that the USACOE did not have the space available to relocate the decontamination station at the Crosslake campground. A follow-up phone call was made in January, 2017 to see if there were any changes since the 2016 discussion. There was none. That being said, we are open to working with partners to identify possible</p>	

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
		<p><i>and Gull Lake Association located in both Cass and Crow Wing Counties, publish a newsletter/ journal with multiple issues during the year. These newsletters/ journals are distributed to all local property owners in addition to the lake association members. We believe that our lake associations can work with the County to more efficiently and effectively publish and distribute AIS related information, including items prepared by County personnel.</i></p> <p>f. Information Item: In 2018 the Department of Natural Resources (DNR) informed lake associations that the 50/50 grant program was eliminated that resulted in a reduction for WAPOA and Friends of Lower Hay of about 1,200 hours last year, and there is no indication that this grant program will be available for 2019;</p> <p>4. <u>Consider changes to make the Decontamination program more effective.</u></p> <p>a. <i>Consider mandatory decontamination of watercraft entering and leaving multiple lakes in and about the County, which watercraft are the “transporters” of the non-native AIS,</i></p> <p style="margin-left: 40px;">i. The two-year old Wright County model for mandatory watercraft inspection is a good test program</p> <p style="margin-left: 40px;">ii. Assess adopting the effective mandatory inspection programs in the western United States’ states that could be tested immediately.</p> <p>b. We all understand the importance of watercraft decontamination, but the present program is not working as measured by expenditures and usage as the number of decontamination treatments performed in 2017, 2016 and 2015 have decreased and “not measured up” to the requirement for decontamination.</p> <p>c. <i>We are interested in assisting the County to locate a more visible, accessible location for the Crosslake area decon site to encourage increased decon usage over more hours.</i></p> <p style="margin-left: 40px;">i. As we offered in past years, the Crosslake location does not work for numerous reasons. The County should consider locating it at a site near busy accesses, with more hours of operation especially in the morning and better visibility.</p>	<p>alternative locations for the decontamination station in the long-term and in the short-term increase the visibility of current signage along County Road 3. One exciting possibility would be to partner with organizers / planners of the National Loon Center in Crosslake to place the decontamination station within that future development area in a way that increases awareness and use.</p> <p>In 2019, the County plans to spend \$9,000 on a proposed partnership with the Mississippi Headwaters Board (MHB) through their Minnesota Traditions AIS prevention campaign. In 2018, some of the \$24,000 MHB partnership was effective, while other areas, such as geofencing, was not as effective as we had hoped it would be and therefore we are no longer proposing to implement any geofencing technologies as part of 2019’s proposed partnership budget. The 2019 budget for MHB partnership represents a funding reduction of almost \$15,000 compared to 2018. Funds will be allocated to specifically support the social media “arm” of Minnesota Traditions as it has yielded strong objective results and reached targeted people in the past. This includes social media posting and advertising, a share/like promotional campaign, content creation including custom videos, and coordination and administration.</p> <p>Concerning transfer risk, wake boats, and MAISRC, we are always looking for new and innovative ways to prevent the spread of AIS that are highly vetted and grounded in research. We will continue to monitor AIS research activities at the MAISRC and will consider implementing any strategies that will be</p>	

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
		<p>ii. The Pelican Lake Association decontamination resource at Breezy Point could be duplicated in the Crosslake and other areas about the lakes area, and</p> <p>iii. Another option might be contracting with a private car wash and marine enterprise as the operator of the decon service.</p> <p>5. <i>Terminate the present multi-county regional initiative (\$9,000). We learned that the recent “geo-fencing” initiative for messaging and sharing information has not been effective.</i></p> <p>a. We believe the County should work with the Mississippi Headwaters Board (MHB) and other counties in developing and implementing effective initiatives.</p> <p>b. We are interested in the “results” realized from the MHB “geo-fencing” initiative, which results should be shared with our lake associations.</p> <p>c. As proposed initiatives and projected costs are identified, representatives of our lake associations are available to meet with the County and MHB staff to review, and if approved, decide how to fund those projects,</p> <p>6. <i>Risk classification is an improvement over previous years.</i></p> <p>a. We are pleased to see Crow Wing County working with MAISRC and using their early research addressing decision-making tools for optimizing resources for managing AIS, especially zebra mussels and starry stonewort. The predictive risk model for zebra mussels and starry stonewort developed by MAISRC researchers to estimate the probability of a lake getting infested by 2025 is a “static” model at this time. The County should not limit local decision-making to a “static” model and ignore the changes and dynamics of specific lakes “carrying capacity”, types of present and new watercraft, identification of new AIS introductions, seasonal watercraft traffic volumes, and related factors.</p> <p>b. The risk model does not, for example, consider the present MAISRC research focused on the high risk AIS “transfer vector” of “wake” boats that are increasingly taking over our lakes. A recent article – <u><i>“Zebra mussels’ best friend: wakeboard boats”</i></u>:</p>	<p>efficacious towards the shared goal of preventing the spread of AIS and are cost effective. Crow Wing County will commit to establishing pro-active communications and a relationship with wake board sellers in the Brainerd Lakes Area on the importance of “Clean, Drain, Dispose” and articulating the challenges of “draining” wake boats. That being said, at this point, we do believe the current allocation of watercraft inspection hours as currently proposed, will successfully help prevent the spread of AIS and education the most amount of people at public water accesses.</p> <p>Concerning the creation of an AIS advisory committee, since 2010, when Crow Wing County assumed administrative responsibilities for County water planning, Crow Wing County has been at the forefront of pro-active communication with all stakeholders concerning water quality and AIS prevention. We will continue our aggressive, proactive and broad approaches to getting input from stakeholders. Below is a list of events and opportunities where Crow Wing County has pro-actively solicited feedback and answered questions from stakeholders concerning AIS:</p> <ul style="list-style-type: none"> • April: Participation in AIS roundtable hosted by WAPOA, others • May: Hosted lake association open house • May: AIS decontamination hotline and general decontamination awareness advertising • July: AIS newsletter sent to all riparian property owners (those who live on a river or lake) in the County (over 14,000). 	

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
		<p>Pioneer Press January 22, 2019 https://www.maisrc.umn.edu/news/wakeboards</p> <p>c. We suggest there should be a recognition of the AIS “transfer risk” for lakes in a region adjacent to “very high risk” lake(s), which should be classified as “high risk” lakes.</p> <p>7. <i>Establish a County AIS Advisory Committee.</i> Our lake associations have recommended from the start in 2015 that Crow Wing County appoint an AIS advisory committee as exists in several North Central Minnesota counties and similar to committees the County has for several functions, but was apparently not deemed necessary but should be reconsidered.</p> <p>a. An AIS advisory committee would enable much improved communication and coordination between the County and lake associations.</p> <p>b. The Northern Crow Wing Coalition of Lake Associations has served as a “defacto” AIS advisory committee as we meet to discuss the annual County Plan, organize our annual AIS Roundtable, and share suggestions and ideas for effectively managing non-native AIS in our area.</p> <p>c. We are rarely asked by the County for input on these matters even though our associations have a major role in the annual implementation.</p> <p>d. We suggest that the County complete a second funds allocation in July considering withheld or under-spent state aid funds to enable lake associations to plan their late summer and fall watercraft inspection schedules.</p> <p>e. We believe preparing the County’s Annual AIS plan would be more effective working with lake associations rather than offering a “public comment” period after issuing it.</p> <p>Contribution of Lake Associations to AIS Prevention and Control</p> <p>Our lake associations have provided significant financial and “in kind” contributions for AIS control and prevention, which clearly has had a</p>	<ul style="list-style-type: none"> • August: Mississippi Headwaters Board (MHB) Canoe Days event • August: Crow Wing County Fair • September: End of year AIS wrap-up meeting hosted by Crow Wing County. • December/January: 30-day public comment period for proposed 2019 AIS Prevention Plan • Spring – fall: weekly e-mails to lake association and LIDs with updates about the status of the watercraft inspection program and other AIS specific information. • All year: one-on-one informal meetings with lake association representatives • All year: AIS summit and other conferences where stakeholders are in attendance. • All year: Various individual e-mails and phone calls, responded to promptly. <p>The process used for gathering formal feedback from the public for the 2019 AIS Prevention Plan is a way in which we can receive the broadest diversity of inputs from as many stakeholders as possible. Crow Wing County is not aware of any other counties that use a comment period to garner public feedback. It is the same process used for other land-related practices such as the Water Plan, Land Use Ordinance, and recreation trail proposals. The process is clear, consistent, transparent, and effective. According to the Minnesota DNR, Crow Wing County’s annual AIS Prevention Plan is “a great example for others” to follow. We are committed to meeting with all lake associations as issues arise and will continue to commit to a year-end wrap-up meeting annually.</p>	

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
		<p>county-wide impact and demonstrates that we are all in this challenge together.</p> <ol style="list-style-type: none"> 1. While the County AIS Plan fails to recognize these considerable financial and “in-kind” efforts of our lake associations in AIS services, we provide the following accounting for inspection spending, education and public information, training and donations, as well as volunteer inspection hours not reported here, including: <ol style="list-style-type: none"> a. <i>Annual inspection hours through ERC exceeding state aid funds</i> b. <i>Lake Associations’ contributions to the Univ of MN AIS Research Center</i> c. <i>Pelican Lake Assn (PLA) – construct new Breezy Point decon center</i> d. <i>WAPOA – construction of campsites with electricity and sewer @ ACOE Crosslake in exchange for watercraft inspection hours</i> e. <i>AIS Tracker program initiated by PLA with MAISRC; statewide in 2017</i> f. <i>AIS plant surveys annually</i> g. <i>Lake water quality testing during summer months at a cost of \$220 per lake per year</i> h. <i>Here is a summary of lake associations “direct” expenditures for 2018:</i> 2. The MN DNR has continually reminded us that our lakes are for "all" people and not just the property owners. If that is the case, then the County should also be funding efforts to keep our lakes healthy, and not just lake associations and the State. If starry stonewort, spiny waterflea, Eurasian watermilfoil or silver carp get into the Whitefish, Pelican, Gull or other area lakes, Crow Wing County Commissioners and officials and the rest of us can watch property values slide downward. Then we will witness the County address the county tax levy increases on <u>all</u> property owners to make up the difference. We need to remain ahead of the problem and help with the AIS prevention effort. <p>At the present time, the annual funds from all sources spent on watercraft inspections, decontamination, milfoil treatment, and education and information is considerably</p>	<p>Concerning in-kind spending by lake associations and other AIS partners, the funds allocated by the State of Minnesota do not require a local "in-kind" match as many state grants do. Crow Wing County recognizes the huge role lake association play in preventing the spread of AIS. Over the years, our AIS program has been driven in large part by the input and thousands of hours of additional annual watercraft inspections financially supported by lake associations. Crow Wing County is grateful and excited to see the passion and dedication of local lake associations making a difference one lake at a time in Crow Wing County</p>	

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
		<p>less than needed to be effective in preventing the introduction and/or spread of AIS in Crow Wing County. We strongly believe the County needs to make a financial commitment of property tax levy funds to support a more effective AIS prevention program. Long-term we understand and believe that the research underway at MAISRC will be the ultimate solution to these non-native AIS matters. But in the meantime, watercraft inspections and public information/education is the intermediate solution to thwart the further introduction and spread of non-native AIS.</p> <p>Our lake associations will continue to be contributors to this AIS responsibility. We also would be available to meet to discuss our suggestions and recommendations prior to the County Board meeting addressing this 2019 Plan or invited to present at the Board meeting.</p>		
1/21/2019	Ron Trosvig & Dan Martonik (USLLIA BOD) Mike Simons & Ruth Naber (USLL LID BOD)	<p>Greetings from the Upper South Long Lake LID and Improvement Association Board of Directors. We reviewed with interest the 2019 Crow Wing County AIS Prevention Plan. This information is very valuable in managing our lake. Below is our input:</p> <p>1) Inspection hours- We support your targeted approach in focusing on high risk source lakes. Our inspection hours were cut from 520 to 300 and we would appreciate receiving more hours if possible. We can fund a certain level of Inspection hours if necessary.</p> <p>2) Other Concerns with AIS Prevention Plan 2019: From the chart on page five Administrative costs appear to be from the category of "Inspection": \$10,000 for hiring coordination and facilitation PLUS \$3500 for AIS staff lead position mileage PLUS \$64,407 to hire County Staff Coordinator EQUALS \$77,907 which amounts to 21.6% of the inspection category or 17.0% of the ENTIRE BUDGET. This seems excessive (since administrative as recently as 2017 was only 9.9% as stated at the Lake Association meeting on Sept. 21st of 2017 with land services dept.)</p> <p>Secondly, if the full time staff person is responsible for hiring and coordination of inspectors, what is the \$10,000 for? Why would that not be an expected part of that person's job?</p> <p>Also, is this new full time position really a new hire or is it someone who is already on the land services payroll but cost of their salary & benefits is just going to be paid for with state dollars instead of county dollars? County website personnel directory</p>	<p>Thank you for your comments. Concerning inspection hours on the South Long Lake landings, see staff response to comment #3, above. South Long Lake Landings do indeed experience heavy watercraft traffic volumes. However, in summary, a number of objective information has resulted in South Long Lake landings receiving less overall inspection hours versus 2018. A couple of those reasons is that the data shows that 1.) most boats entering upper and lower South Long Lake landings are coming from Crow Wing County lakes that already have watercraft inspectors assigned to them (therefore inspecting watercraft before they enter uninfested lakes), and 2.) the overall numbers of watercraft entering South Long Lake landings from an infested lake is lower than that of other lakes in Crow Wing County. That being said, partners (i.e., lake associations and LIDs) will be able to request expanded inspection hours that would allow for increased inspections on lakes if inspector availability and scheduling allows for that.</p>	14

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
		<p>lists 5 current personnel as Environmental Services (two as supervisors, two unspecified, and one as specialist - which is what page two of the document calls this newly created position)</p> <p>Earlier discussion was about the distribution of inspector hours (specifically our decrease). We also should be concerned that 8 infested lakes will no longer have ANY inspector hours - if we are expecting any contaminants to be caught at the other inspected lakes, maybe it doesn't make sense to reduce hours at the few lakes that are not currently infested (like OURS)</p> <p>We appreciate the ongoing support and partnership that we have with Crow Wing County.</p> <p>Let me know if you need any clarification on our input.</p> <p>Regards, Ron Trosvig - President - Upper South Long Lake, Improvement Association Dan Martonik - Vice President Upper South Long Lake, Improvement Association Mike Simons - President - Upper South Long Lake, Lake Improvement District Ruth Naber - Vice President - Upper South Long Lake, Lake Improvement District</p> <p>http://www.usllia.org/lidboard.html</p>	<p>Concerning the new Land Services staffing position as it relates to reasons why, see staff responses to comment #2 & #4, above.</p> <p>Concerning the nature of the position, this is a new full time equivalent (FTE) position with a new job posting and competitive hiring process.</p> <p>Concerning in-kind / administrative costs, the 9.9% referred to in the 2018 AIS Prevention Plan was identified using only the cost of staff paid to lead the program from the AIS funds budget. It did not include monies paid to the third-party staffing agency to hire watercraft inspectors on a per-hour basis. In 2018, the staffing agency was paid \$19.02/hour for a \$13/hour wage earned by a watercraft inspector. That totals \$6.02/hour in staffing agency expenses over and above the inspector's wage. At 16,600 inspection hours and 650 (+/-) decontamination hours, the staffing agency was paid approximately \$100,000 in total to facilitate hiring of watercraft inspectors. That figure alone conservatively represents approximately 22% of the 2018 AIS budget. In 2019, Crow Wing County will only be spending approximately \$1.38/hour in payroll taxes on top of inspector wages. Add to that the \$64,307 salary plus \$3,500 in mileage reimbursement, and administrative expenses amounts to approximately 20% of the total AIS budget in 2019.</p> <p>Concerning the \$10,000 earmarked for "hiring coordination and facilitation", those are monies proposed to be spent on advertising creation and publishing (i.e., radio, newspaper, websites, banner ads, social media, etc.), the creation of</p>	

2019 AQUATIC INVASIVE SPECIES (AIS) PREVENTION PLAN

Date	Name	Comments	Staff Comments	#
			<p>banners/posters for job fairs and Land Services lobby, drug and background testing for newly hired inspectors, and other HR related expenses related to on-boarding. Since this is the first year Crow Wing County is hiring all watercraft inspectors in-house (i.e., no third-party staffing agency), we will take a close look at the end of the year at this budgeted item (and all others) to ensure it is the proper amount moving forward into 2020.</p> <p>Concerning the overall number of landings that will be inspected in 2019, the new model results implemented in 2019 dictated the first 30 landings to be inspected, and then we selected an additional 12 landings to add to it, for a total of 42 proposed landings. Those additional 12 landings added were added based on overall landing usage (i.e., inspections per-hour) from the past 3 years' worth of inspection data. Landings not included in that list had inspection per-hour data that were less than 1 boat per-hour, which means the landing use is very low overall and was not considered for watercraft inspections regardless of infestation status. This includes some landings that were inspected in 2018, but will not be included in 2019's Plan.</p>	