

## Lakes & Watershed Commission

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July 21, 2004

TO: Brian Standing, Senior Planner

FROM: Sue Jones, Watershed Management Coordinator

SUBJ: Dane County Lakes and Watershed Commission Comments on

Comprehensive Plan Goals and Objectives

This memo provides Lakes and Watershed Commission comments on the Agricultural, Natural and Cultural Resources Work Group consensus objectives. Please incorporate these comments into the record of the July 21 "milestone meeting" so that they can be used in the next phases of County Comprehensive Plan development.

Thank you.

## **General comments**

- 1. Although this critique, by its nature, addresses perceived weaknesses, this draft is a laudable first effort.
- 2. There already are other broad planning documents that are relevant to the comprehensive plan, including the planning documents developed by the Yahara Lakes Advisory Group, the Lake Mendota Priority Watershed planning documents, Dane 2020, etc. This document should integrate and be compatible with those other plans.
- 3. The general scope of "goals" is pretty straightforward. The "objectives," however, seem to be a hodge-podge of very generalized subject areas or themes, coupled with detailed, numerical or time-specific activities. For example Objective 4.b. is includes a specific target and timetable for improvement of impaired waters; objective 4.e is essentially just a topic, and appears to be a holding place for something more substantive.
- 4. It is not clear whether the order of presentation has any significance. The goals appear to be a priority order, but the underlying objectives or activities do not.
- 5. The more substantive, tangible objectives are inadequate: they tend to focus on preserving the status quo with long-duration milestones. We may not fulfill our objectives, but they should inspire us to be aggressive: restoring and increasing wetlands that provide flood flow, filtration, habitat and other functional values; increasing groundwater recharge through land use planning and construction/development management; reducing nutrient loads to surface waters.

## **Specific comments**

Goal 1: there is no recognition of the importance of a) intergovernmental cooperation and planning, and b) involving businesses in planning.

Goal 2: flood management objectives should include reducing run-off from existing and new developments; restrictions on construction in floodplains. Objective a is too vague to be useful.

Goal 3: objectives k (flagged for more discussion) and a may be incompatible: "no net loss" in development will never result in reversal of draw-down because there will be net loss for other reasons (e.g., new and larger highways). We also do not understand why the group targeting 40+ years to reverse the trend. The goal should be to "increase" or "enhance" groundwater recharge through both land use planning and construction techniques in developments, and it can begin as soon as the institutional/political/legal infrastructure is in place.

Objective h. is already in place: in fact, the stormwater and erosion control requirements extend beyond "new urban development" and do more than improve groundwater recharge.

Goal 4: objectives a, b and c have unduly long target dates. What is the justification? Why is there a date in a at all? There needs to be an objective to better manage farmland run-off, in particular from large animal yards. There appears to be no prioritization of objectives, and the objectives range from too vague to be useful (e.g., j.) to limited by detail (e.g., g). Additionally, there should be an objective focusing on nutrients.

Goal 5: this goal may actually be multiple goals, some of which are part of other goals: preserving/restoring ecosystem; enhancing aesthetics; providing recreational opportunities. All implicate the objective of implementing and enforcing comprehensive, county-wide land use planning that is sensitive to water-related resources.

Goal 6: is this a goal? It seems that Dane County has a history of providing "adequate public access." We would think that a goal of "enhancing recreational opportunities" associated with water resources is a more appropriate goal. We want to encourage use of our lakes and parks as public gathering places. It may include more or better public access to water resources, including landings and shoreline parks. It may include improvements to public shoreland facilities, like beaches, fishing piers, shelters, etc. It may include regulation to ensure quality access for sometimes competing uses (e.g., personal water craft and canoes). It may include management of water levels, shoreline protections that preserve scenic beauty and reduced nutrient loadings, and other nutrient reduction and water clarity measures (e.g., weed control).

The single objective under goal 6 also is too limiting. We don't believe that the only public access issue of concern is access for canoes, kayaks, etc. Goal 6 may be the least significant in terms of long-term protection of water resources or environmental stability, but it may have the greatest tangible impact on the largest number of County residents and visitors.