

RLIA Recommendations on the City of Lake Mills Comprehensive Plan 2023:

Dated: 3.25.23

As a Commission member noted in the February Plan Commission meeting, some mention of salt or chloride should be made within this Plan. Salt concentrations are rising in area lakes, rivers, and groundwater due to runoff from sidewalks, roads, and streets. Currently 51 rivers and one lake in southeastern Wisconsin are considered chronically impaired for chloride by the Wisconsin DNR. The application of street brining technology instead of solid rock salt application in winter can be successful in reducing these impacts and has been initiated by the City of Lake Mills. The City should explore expanding its brining program. In addition, the City should commit to smart salt or deicer usage on sidewalks and parking lots that are within 75' of Rock Lake, Marsh Lake or Rock Creek.

Section: Watersheds & Surface Waters:

Plan's redlined proposal:

Located at the western edge of the City, Rock Lake is the most prominent natural feature in Lake Mills. Although only a narrow band of the City of Lake Mills drains stormwater directly into the 1,400-acre lake, that portion, along with ~~the majority of~~most of the Lake's northern and northeastern shore outside the City, has been thoroughly developed, primarily with single-family residences. Despite this, the water quality of the Lake remains relatively high, in part owing to the extension of sanitary sewer to the heavily developed shoreland area in the Town of Lake Mills, management of the Lake's water levels to prevent shore erosion, and recent measures to protect shoreland areas from future development. Another feature ~~likely contributing~~contributing to the high water quality is the relatively undisturbed marsh and wetland areas south of the lake. Rock Creek drains Rock Lake and flows eastward through the City and Hooper Mills Pond before flowing into the Crawfish River. The Crawfish River, in turn, is a tributary of the Rock River and flows southward past Aztalan State Park before joining the Rock River in the City of Jefferson.

RLIA recommends a number of changes to this opening paragraph:

1. Given the importance of Rock Lake to the community's recreational, cultural, and economic identity, why not indicate that value in the opening of this section? For example, "Located at the western edge of the City, Rock Lake is the most prominent natural feature in Lake Mills. **It is the community's key asset and one that requires an active and ongoing effort to prevent its decline or degradation.**"
2. This opening section is relatively unchanged from the prior plan and outlines a description of a healthy lake reflecting no changes in ten years. This is incorrect. The proposal notes: "Another feature contributing to the high water quality is the relatively undisturbed marsh..." It's important to note that the waters feeding the marsh and Rock Lake have degraded. In 2018, Mud Lake was designated as impaired for excess nutrients by the Wisconsin DNR. Then in 2022, Rock Creek, which flows from Mud Lake and into Marsh Lake, was also designated as impaired for the same reason. Neither of these water bodies have current plans in place to address this designation. We would like to see these changes reflected in the opening paragraph.

3. The paragraph notes that “although only a narrow band of the City of Lake Mills drains stormwater directly into the 1,400 –acre lake...” What is the purpose of this statement? The City has 60+ storm drains that empty directly into the lake and these drains account for a significant source of excess nutrients and other contaminants. The plan should note this fact.
4. The paragraph mentions, “recent measures to protect shoreland areas from future development”. What were those measures? Would it make sense to strike this comment?
5. The development of the Lake shoreline properties between the eastside and westside are very similar. Consequently, we would strike “heavily” when describing the development on the Town side: “ ~~...to the heavily developed shoreland area in the Town of Lake Mills...~~”

Plan’s redlined proposal:

Rare Species Occurrences

According to the Wisconsin Department of Natural Resources, there are occurrences of aquatic endangered species in the sections surrounding Rock Lake. There are aquatic and terrestrial occurrences southwest of the City in the Lake Mills State Wildlife Area and northwest of the City in the Town of Milford. Detailed information regarding the types of endangered animals, plants, and natural communities can be found at the Department of Natural Resources’ website, <http://dnr.wi.gov/org/land/cr/workinglists/mapsbycounty.htm>.

It’s important to be specific that Rock Lake is home to endangered species and not just vaguely refer to “sections surrounding Rock Lake”. According to Rock Lake’s Management Plan 2018-2028, Rock Lake is home to one endangered fish species (slender madtom), one threatened species (pugnose shiner) and three special concern species (banded killifish, lake chubsucker, least darter). Its watershed is also home to the Blanding Turtle which is listed as a special concern species.

Section: Natural Resource Goals, Objectives, and Policies Goals

Objectives:

General comments: Rock Lake is the City’s most important natural resource and distinguishing characteristic. The language in the Plan regarding the Lake should not be aspirational (“strive to”, “whenever possible”, “will consider”) but one of commitment and priority (“will require”, “must”) which simply reflects the importance of this asset.

Policies:

Plan’s redlined proposal:

2. The City will work with Jefferson County, the Joint Rock Lake ~~Committee~~Committee, and other entities in an effort to ~~to find common ground on~~ prioritize the objectives of the ~~2006-2018-2028~~ “Management Plan for Rock Lake”

The Rock Lake Improvement Association has been in this community for 50 years and sponsored the lake management plan which is referenced in this policy. This policy should be changed to:

The City will work with Jefferson County, the Joint Rock Lake Committee (JRLC), and the Rock Lake Improvement Association (RLIA), as well as other entities to find common ground and implement the objectives of the “2018-2028 Rock Lake Management Plan”

Plan’s redlined proposal:

~~4.~~ The City will continue to ~~adhere-implement to latest~~ established Best Management Practices regarding erosion control and stormwater run-off for all new development in the City.

Redevelopment should be added to this policy. Consequently, this would read:

The City will continue to implement established Best Management Practices regarding erosion control and stormwater run-off for all new development or remodeling/renovation within in the City.

~~6.~~ The City will protect groundwater quality by limiting the type and intensity of development near municipal wells through Wellhead Protection Overlay zoning and other measures.

Another concern to groundwater is the PFAS family of chemicals which are known carcinogens. The EPA just proposed the first ever national drinking water standard on PFAS which is considerably stricter than our current state regulations. For the City of Lake Mills, PFAS contamination could come from a local business’s discharge or from the Lake Mills Fire Department (or other fire departments who respond in support of Lake Mills) to contain a Class B fire. To safeguard this possibility, the City should request that the Lake Mills Fire Department seek other options than using PFAS containing products, or family of products, when fighting Class B fires and advocate for that change within MABAS (Mutual Aid Box Alarm System) 118 that they are associated with, including Jefferson & Cambridge. The Lake Mills Fire Department should also be required to work with the WDNR to safely remove existing PFAS foam. PFAS fish consumption alerts already exist for nearby waters: Lake Monona, Lake Waubesa, Lake Kegonsa and the Yahara River.

Plan’s redlined proposal:

~~11.~~ The City will ~~maintain conduct~~ a census of Street Trees ~~by 2012 to~~ ~~safeguard theensure~~ health of the City’s “urban forest”, ~~ensure a higher percentage of new plantings are of native tree species.~~ ~~A~~ and work to raise awareness by property owners of good management practices and threats to healthy trees.

Change to: **The City will maintain a census of Street Trees to safeguard the health of the City’s “urban forest.” In addition, the City will use only native trees in its “urban forest” when planting new or replacement trees. The City commits to prioritizing the importance of keeping established trees when considering new development or redesign of public spaces. The City will strive to minimize its use of**

herbicides or pesticides on City property and will post signage for public awareness when chemicals are used. Within 75' of Rock Lake, the City will not use herbicides, pesticides, or fertilizers.

Section: Balance Nature Based Recreation with the Need to Protect the Resources:

Plan's redlined proposal:

In high use areas, it may be necessary to institute measures that limit the intensity of use as well as the type of improvements. In Lake Mills, use of Rock Lake serves as an example, though others may arise in land and wetland areas. The popularity of recreational boating and fishing in Rock Lake has led to concerns over safety, shoreland protection near boat launches, water quality of the lake, and the overall level of enjoyment. Such concerns are typically most acute at specific times of the year such as major summer holidays. This Plan recommends exploring ways to balance ~~the competing rights to access and enjoy the lake~~ recreation with environmental issues.

This will become an increasingly important area of concern as motor size, speeds, and wake creation increase. All shorelines are vulnerable to degradation. In addition, the City should work collaboratively with the Town, County, WDNR, the Joint Rock Lake Committee, and RLIA to balance recreation, safety and the health of the lake. A possible rewrite: **“...led to concerns over safety, shoreland protection, water quality of the lake, and the overall level of enjoyment. Such concerns are typically most acute on summer weekends and holidays. This Plan recommends working collaboratively with the Town, County, WDNR, the Joint Rock Lake Committee (JRLC), and Rock Lake Improvement Association (RLIA) to explore ways to balance lake recreation and safety with the overall health of the lake.”**

Section: Advance Stormwater Best Management Practices

Plan's redlined proposal:

The City should continue to require development to incorporate appropriate stormwater management facilities to mitigate the negative impacts stormwater can have on waterways and downstream properties.

It is imperative that new development incorporates stormwater Best Management Practices. However, it is also important for developed urban areas, whose stormwater enters Rock Lake directly, be encouraged to implement practices on their own properties as well. The City should actively educate and encourage residents to implement Best Management Practices.

Section: Reduce Impermeable Surfaces within ~~Multi-Lot~~ Developments.

Plan's redlined proposal:

Reductions in the total impermeable surface area for a ~~multi-lot~~ development site can be achieved by:

Redline “multi lot” in the above next sentence as well.

Section: Vegetated Buffer Strips:

Plan's redlined proposal:

Vegetated Buffer Strips:

Locating areas of vegetation at a property's periphery helps restrict the off-site flow of water. Also, the addition of organic material to soil aids in the decomposition and filtration of pollutants. This technique is particularly useful for areas abutting shoreland areas and ~~wetlands, and~~ wetlands and provides~~ed~~ the additional benefit of preserving habitat for the many water and terrestrial species dependent shoreland habitat. (See Natural Resource Recommendations #4 above). The ~~City~~ city currently requires a vegetative buffer within 35 feet of shorelines except for within vision access corridors. Vegetative removals outside

This section should be changed to "Vegetated **Native** Buffer Strips"

Native plantings significantly out-perform non-native plantings in allowing the ground to absorb water (water infiltration). Native plant root systems can penetrate soil to a depth of multiple feet. One-third of native plantings' root systems die annually, creating extensive channels for infiltration. Turf grass, on the other hand, has a root system depth of about 1.5 inches and creates a hard surface which promotes runoff. Lawns allow 7-9x the amount of nutrients and 18x the amount of soil/sediment to enter the lake compared to a shoreline of native plantings. Currently, the City ordinance suggests native plantings. In this plan, the City should explore changing this ordinance to require native plantings.