From: Wright, Skip W (DNR)
To: Gunderson, Larry (MDA); Berg, Jeffrey (MDA)
Cc: Wright, Dave I (DNR)
Subject: FW: Comments from DNR Groundwater Technical Staff and Climatology
Date: Monday, February 08, 2016 3:34:45 PM
Attachments: image003.png

Hi Jeff and Larry:

Just following up on our discussions with some technical comments we received from Greg Spoden and Steve Thompson's group.

1) From Greg Spoden(DNR State Climatologist)

Greg said that using the climatological start of fall was a reasonable and commonly used reference point. He said that his comments were not based on a detailed understanding of how the definition of fall would impact the new rules but rather reflected that using September 1st as the start of fall is a commonly used reference point

2) From: Todd Petersen (DNR)

I have two comments on the five page document entitled "Request for Comments, Proposed Rule Governing Nitrogen Fertilizer, Minnesota Rules, 1573; Revisor's ID Number R-04337".
I have added sticky notes to the MDA pdf file and am attaching it to this email. My comments are also repeated below.

On page 2, under 3.b., the MDA is proposing that karst or fractured bedrock be considered a vulnerable area. Please note that DNR will be publishing a statewide new karst feature class along with the Minnesota Hydrogeology Atlas, HG-02, Pollution Sensitivity of the Near Surface. The MDA may wish to reference this new karst feature class.

On page 3, under 3.d., the MDA is considering using the DNR's Procedure for Determining Near-Surface Pollution Sensitivity. Note that the linked document in MDA's Proposed rule summary is an older static version. A new procedural document will be published this spring with HG-02, the Minnesota Hydrogeology Atlas report on Near-Surface Sensitivity. Also note that the referenced DNR document describes a procedure to rate areas of near-surface sensitivity from Very High to Very Low. The MDA does not state which DNR ratings will be used for the Nitrate Vulnerability rules.

Let me know if you have any questions. Thanks, Skip

From: Wright, Skip W (DNR)
Sent: Monday, February 08, 2016 3:16 PM
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