

Molloy, Kevin (MPCA)

From: Judi Poulson <judpeace@gmail.com>
Sent: Thursday, January 26, 2017 7:03 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Judi Poulson
1881 Knollwood Dr
Fairmont, MN 56031

Molloy, Kevin (MPCA)

From: Jacob Crawford <jacob@waterlegacy.org>
Sent: Wednesday, January 25, 2017 8:42 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Jacob Crawford
2125 E. River Terrace
#104
Minneapolis, MN 55414

Molloy, Kevin (MPCA)

From: Larry Bogolub <lbogolub@comcast.net>
Sent: Thursday, January 26, 2017 7:05 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Larry Bogolub
1424 Lincoln Avenue
Saint Paul, MN 55105

Molloy, Kevin (MPCA)

From: Mike Fish <Mike.fish@wsn.us.com>
Sent: Thursday, January 26, 2017 7:08 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Mike Fish
4367 Cedar Scenic Road
Baxter, MN 56425

Molloy, Kevin (MPCA)

From: Charles Frach <frach@paulbunyan.net>
Sent: Thursday, January 26, 2017 7:09 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Charles Frach
12219 Starling Ln NE
Bemidji, MN 56601

Molloy, Kevin (MPCA)

From: Pam Coffin <ppdkoff@gmail.com>
Sent: Thursday, January 26, 2017 7:10 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Pam Coffin
10493 highway 1
isabella, MN 55607

Molloy, Kevin (MPCA)

From: Bob Haugen <crystalbobh@gmail.com>
Sent: Thursday, January 26, 2017 7:17 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Bob Haugen
5813 36th Ave N
Crystal, MN 55422

Molloy, Kevin (MPCA)

From: Bruce McKay <bmckay.aces@gmail.com>
Sent: Thursday, January 26, 2017 7:26 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Bruce McKay
290th
Henderson, MN 56044

Molloy, Kevin (MPCA)

From: stephanie johnson <rosskemo@gmail.com>
Sent: Thursday, January 26, 2017 7:26 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

I live one lake over from the BWCA and realize the importance of protecting our lakes and streams which are interconnected.

stephanie johnson
po box 1481
grand marais, MN 55604

Molloy, Kevin (MPCA)

From: Marian Lansky <marianlansky@gmail.com>
Sent: Thursday, January 26, 2017 7:27 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Marian Lansky
394 S Lake Ave
Ste 206
Duluth, MN 55802

Molloy, Kevin (MPCA)

From: britta keenan <bkatiek@gmail.com>
Sent: Thursday, January 26, 2017 7:28 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

britta keenan
2138 Susquehanna
philadelphia, PA 19125

Molloy, Kevin (MPCA)

From: Edna Mullen <stokesouth@sky.com>
Sent: Thursday, January 26, 2017 7:31 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Edna Mullen
1272 Richland Avenue
Saint Charles, MN 55972

Molloy, Kevin (MPCA)

From: Laura Regan <lregan@duluthmn.gov>
Sent: Thursday, January 26, 2017 7:39 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Laura Regan
5413 N. Cloquet Rd.
Duluth, MN 55810

Molloy, Kevin (MPCA)

From: Rosemary Welch <rositamarais@gmail.com>
Sent: Thursday, January 26, 2017 7:46 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Rosemary Welch
6101 Cilff Estate Rd
Little Marais, MN 55614

Molloy, Kevin (MPCA)

From: Jan Stern <ratattackteam@toast.net>
Sent: Thursday, January 26, 2017 7:48 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Jan Stern
1303 92nd Ave w
Duluth, MN 55808

Molloy, Kevin (MPCA)

From: Dale Stewart <dstewartsnow@live.com>
Sent: Thursday, January 26, 2017 7:50 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Dale Stewart
PO Box 792
Willernie, MN 55090

Molloy, Kevin (MPCA)

From: Edward Bouril <bourilimages@msn.com>
Sent: Thursday, January 26, 2017 7:51 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Edward Bouril
3618 Xenia Ave N
Crystal, MN 55422

Molloy, Kevin (MPCA)

From: Bob Steininger <steininger.bob@gmail.com>
Sent: Thursday, January 26, 2017 7:57 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Bob Steininger
100 Westridge Place South
Phoenixville, PA 19460

Molloy, Kevin (MPCA)

From: Lee Waltz <waltz1@northlc.com>
Sent: Thursday, January 26, 2017 7:59 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Lee Waltz
3080 Rush Point Drive
Rush City, MN 55069

Molloy, Kevin (MPCA)

From: Anne McManus <annegmcm@gmail.com>
Sent: Thursday, January 26, 2017 8:01 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Anne McManus
516 S. 4th Street
Bayport, MN 55003

Molloy, Kevin (MPCA)

From: A Bonvouloir <ra3ajw@sbcglobal.net>
Sent: Thursday, January 26, 2017 8:02 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

A Bonvouloir
POB 70185
Sunnyvale, CA 94086

Molloy, Kevin (MPCA)

From: Nancy Hauer <Nancy@Rookhouse.org>
Sent: Thursday, January 26, 2017 8:02 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Nancy Hauer
1990 Ridgewood Ave.
White Bear Lake, MN 55110

Molloy, Kevin (MPCA)

From: Paul Densmore <pmdensmore@gmail.com>
Sent: Thursday, January 26, 2017 8:07 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Paul Densmore
800 W 65th St #102
Richfield, MN 55423

Molloy, Kevin (MPCA)

From: Brian and Ruth Lavelle <redtail@springgrove.coop>
Sent: Thursday, January 26, 2017 8:07 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Brian and Ruth Lavelle
19206 Redtail Drive
Spring Grove, MN 55974

Molloy, Kevin (MPCA)

From: Jenni Charrier <jcharrier21@gmail.com>
Sent: Thursday, January 26, 2017 8:11 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Jenni Charrier
1910 Heritage Dr
Wayzata, MN 55391

Molloy, Kevin (MPCA)

From: jane mobeck wilson <jane.mobeckwilson@gmail.com>
Sent: Thursday, January 26, 2017 8:13 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

jane mobeck wilson
1138 shryer ave w
roseville, MN 55113

Molloy, Kevin (MPCA)

From: Sherri Mann <Sherri@mann.org>
Sent: Thursday, January 26, 2017 8:19 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Sherri Mann
18180 olinda trail n
Marine on Saint Croix, MN 55047

Molloy, Kevin (MPCA)

From: Steven Oehlerich <sroehlerich@gmail.com>
Sent: Thursday, January 26, 2017 8:24 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Steven Oehlerich
1778 Linden Cove
White Bear Lake, MN 55110

Molloy, Kevin (MPCA)

From: Jane Zimmerman <janemz123@gmail.com>
Sent: Thursday, January 26, 2017 8:27 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Jane Zimmerman
13915 Co Rd 41
Cologne, MN 55322

Molloy, Kevin (MPCA)

From: Bernadette Knaeble <knaeble@iphouse.com>
Sent: Thursday, January 26, 2017 8:29 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Bernadette Knaeble
1368 Breda Ave
Minneapolis, MN 55408

Molloy, Kevin (MPCA)

From: Shodo Spring <shodo.spring@gmail.com>
Sent: Thursday, January 26, 2017 8:32 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Shodo Spring
16922 Cabot Ave
Faribault, MN 55021

Molloy, Kevin (MPCA)

From: Drew & Karie Johnson <drew.johnson10@gmail.com>
Sent: Thursday, January 26, 2017 8:38 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Drew & Karie Johnson
131 N. Hawthorne Road
St. Paul, MN 55116

Molloy, Kevin (MPCA)

From: Wanda Ballentine <wsb70@comcast.net>
Sent: Thursday, January 26, 2017 8:39 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Wanda Ballentine
1181 Edgcumbe Rd. 314
St. Paul, MN 55105

Molloy, Kevin (MPCA)

From: Jon Hayenga <jdhayenga@gmail.com>
Sent: Thursday, January 26, 2017 8:39 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Jon Hayenga
421 2nd St NW
Stewartville, MN 55976

Molloy, Kevin (MPCA)

From: Sigrid Arnott <sigridarnott@gmail.com>
Sent: Thursday, January 26, 2017 8:41 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Sigrid Arnott
3620 35th Avenue South
Minnesota, MN 55406

Molloy, Kevin (MPCA)

From: Terry McCarthy <jtmjourneys@gmail.com>
Sent: Thursday, January 26, 2017 8:45 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Terry McCarthy
7365 Hill Rd
Two Harbors, MN 55616

Molloy, Kevin (MPCA)

From: Sylvia Lambert <smldancer@hotmail.com>
Sent: Thursday, January 26, 2017 8:46 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Sylvia Lambert
P.O. Box 78
Interior, SD 57750

Molloy, Kevin (MPCA)

From: Mackenzie Epping <mackenzie.epping@gmail.com>
Sent: Thursday, January 26, 2017 8:47 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Mackenzie Epping
127 5th Street NE
Apt. G07
Minneapolis, MN 55413

Molloy, Kevin (MPCA)

From: Michael Killian <Mkillian262@gmail.com>
Sent: Thursday, January 26, 2017 8:57 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Michael Killian
1716 Iowa ave
Superior, WI 54880

Molloy, Kevin (MPCA)

From: carol jagiello <cjags91@optonline.net>
Sent: Thursday, January 26, 2017 8:59 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

carol jagiello
91 wood pl
bloomingtondale, NJ 07403

Molloy, Kevin (MPCA)

From: Elizabeth Neuvar <beefbreath@comcast.net>
Sent: Thursday, January 26, 2017 9:04 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Elizabeth Neuvar
215 10th Ave S Unit 409
Minneapolis, MN 55415

Molloy, Kevin (MPCA)

From: John Harrington <johnrharrington@gmail.com>
Sent: Thursday, January 26, 2017 9:06 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

John Harrington
30726 Ivywood Trail
Stacy, MN 55079

Molloy, Kevin (MPCA)

From: Tanya Beyer <epiphaniesafield@gmail.com>
Sent: Thursday, January 26, 2017 9:08 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Tanya Beyer
10431 Bachelor Square Road
Meadowlands, MN 55765

Molloy, Kevin (MPCA)

From: Jade Black <jadelynn.black@gmail.com>
Sent: Thursday, January 26, 2017 9:13 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Jade Black
3124 Rhode Island Ave. S.
St. Louis Park, MN 55426

Molloy, Kevin (MPCA)

From: Nancy Giguere <nancygiguere@centurylink.net>
Sent: Thursday, January 26, 2017 9:14 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Nancy Giguere
1471 Edmund Ave
St Paul, MN 55104

Molloy, Kevin (MPCA)

From: Julie Hukriede <jhukriede@granitegear.com>
Sent: Thursday, January 26, 2017 9:18 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Julie Hukriede
1785 Stewart River Road
Two Harbors, MN 55616

Molloy, Kevin (MPCA)

From: Erik Roth <erik.roth@earthlink.net>
Sent: Thursday, January 26, 2017 9:25 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Erik Roth
225 W. 15th St. #412
Minneapolis, MN 55403

Molloy, Kevin (MPCA)

From: Louise Waddick <lawaddick@gmail.com>
Sent: Thursday, January 26, 2017 9:25 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Louise Waddick
5304 Blake Rd
Edina, MN 55436

Molloy, Kevin (MPCA)

From: Gregory Pfister <gpfister21@gmail.com>
Sent: Thursday, January 26, 2017 9:29 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Gregory Pfister
3578 Ironwood Ln SW
Rochester, MN 55902

Molloy, Kevin (MPCA)

From: Sherry Abts <birdingabts@gmail.com>
Sent: Thursday, January 26, 2017 9:30 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Sherry Abts
1054 E. Madison Street
Ely, MN 55731

Molloy, Kevin (MPCA)

From: Steve Schultz <summitair@outlook.com>
Sent: Thursday, January 26, 2017 9:44 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Steve Schultz
4401 Parklawn Ave, apt 103
Edina, MN 55435

Molloy, Kevin (MPCA)

From: Lynn C. Lang <lynn_lang@hotmail.com>
Sent: Thursday, January 26, 2017 9:44 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Lynn C. Lang
1721 Polaris Court
Saint Cloud, MN 56303

Molloy, Kevin (MPCA)

From: christine tendle <tine@ineye.com>
Sent: Thursday, January 26, 2017 9:46 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

christine tendle
2435 brenner st
roseville, MN 55113

Molloy, Kevin (MPCA)

From: Mary Lou Wilen <walul3102@gmail.com>
Sent: Thursday, January 26, 2017 9:57 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Mary Lou Wilen
2919 45th Ave. S.
Mpls, MN 55406

Molloy, Kevin (MPCA)

From: Barry Maloney <malo@maloco.com>
Sent: Thursday, January 26, 2017 10:03 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Barry Maloney
3220 E 24th St
Minneapolis, MN 55406

Molloy, Kevin (MPCA)

From: Debra Evon <daevon@stkate.edu>
Sent: Thursday, January 26, 2017 10:10 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Debra Evon
1760 Hennepin Avenue, #34
Minneapolis, MN 55403

Molloy, Kevin (MPCA)

From: Scott Rausch <scott@pixel8.net>
Sent: Thursday, January 26, 2017 10:14 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Scott Rausch
2211 40th Ave NE
Columbia Heights, MN 55421

Molloy, Kevin (MPCA)

From: Rachel Connell <RachelEConnell23@gmail.com>
Sent: Thursday, January 26, 2017 10:19 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Rachel Connell
10144 95th Ave SW
STAPLES, MN 56479

Molloy, Kevin (MPCA)

From: Robert Wohlberg <robertwohlberg@gmail.com>
Sent: Thursday, January 26, 2017 10:21 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Robert Wohlberg
6739 11th ave s
Richfield, MN 55423

Molloy, Kevin (MPCA)

From: Andrew Nesheim <aonesheim@gmail.com>
Sent: Thursday, January 26, 2017 10:23 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Andrew Nesheim
88 Quincy St #2
Brooklyn, NY 11238

Molloy, Kevin (MPCA)

From: Mark Vesley <mvesley@minncle.org>
Sent: Thursday, January 26, 2017 10:23 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Mark Vesley
1598 Edmund Ave
Saint Paul, MN 55104

Molloy, Kevin (MPCA)

From: David Brenner <dbrenner22@gmail.com>
Sent: Thursday, January 26, 2017 10:24 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

David Brenner
1830 Parker Road
Britt, MN 55710

Molloy, Kevin (MPCA)

From: Judy Enenstein <enens001@umn.edu>
Sent: Thursday, January 26, 2017 10:26 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Judy Enenstein
2856 Irving Ave S
Minneapolis, MN 55408

Molloy, Kevin (MPCA)

From: Richard Cardinal <dick_cardinal@excite.com>
Sent: Thursday, January 26, 2017 10:39 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Richard Cardinal
11719 Alcott Drive
Sauk Centre, MN 56378

Molloy, Kevin (MPCA)

From: Thomas Sullivan <tsullivan79@gmail.com>
Sent: Thursday, January 26, 2017 10:40 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Thomas Sullivan
3467 Wilshire Pl NE
Minneapolis, MN 55418

Molloy, Kevin (MPCA)

From: Robert Schmitz <allibobi@comcast.net>
Sent: Thursday, January 26, 2017 10:57 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Robert Schmitz
7961 15th st n
Oakdale, MN 55128

Molloy, Kevin (MPCA)

From: Kristen Palazzari <k.palazzari@gmail.com>
Sent: Thursday, January 26, 2017 11:06 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Kristen Palazzari
821 4TH ST S
Virginia, MN 55792

Molloy, Kevin (MPCA)

From: Lucy Rogers <lucy_rogers@mac.com>
Sent: Thursday, January 26, 2017 11:23 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Lucy Rogers
4608 St. Croix Trail S.
Afton, MN 55001

Molloy, Kevin (MPCA)

From: Marie Nickell <prosperplayhouse@mabeltel.coop>
Sent: Thursday, January 26, 2017 11:33 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

Please represent us by holding a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Marie Nickell
10526 County 113
Mabel, MN 55954

Molloy, Kevin (MPCA)

From: Les Stern <263310les@gmail.com>
Sent: Thursday, January 26, 2017 11:36 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Les Stern
6124 45th St N
Oakdale, MN 55128

Molloy, Kevin (MPCA)

From: Mark Bridge <mark@lonehand.com>
Sent: Thursday, January 26, 2017 11:37 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Mark Bridge
610 Gilbert Avenue South
Park Rapids, MN 56470

Molloy, Kevin (MPCA)

From: Jody Goldstein <jody@goldsteinonline.com>
Sent: Thursday, January 26, 2017 11:57 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Jody Goldstein
PO Box 8025
Rochester, MN 55903

Molloy, Kevin (MPCA)

From: Glenda Noble <glendafaye38@mchsi.com>
Sent: Thursday, January 26, 2017 12:12 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Glenda Noble
336 W. 5th St.
Waconia, MN 55387

Molloy, Kevin (MPCA)

From: Denise Osborne <dosborne@osbornemgt.com>
Sent: Thursday, January 26, 2017 12:26 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Denise Osborne
6612 Ralston
Raytown, MO 64133

Molloy, Kevin (MPCA)

From: Bruce Johnson <johnsonbruce169@gmail.com>
Sent: Thursday, January 26, 2017 12:28 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Bruce Johnson
6763 253rd Ave NE
Stacy, MN 55079

Molloy, Kevin (MPCA)

From: Gail Harty <harty.gail@mayo.edu>
Sent: Thursday, January 26, 2017 12:36 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Gail Harty
34562 Fern Road
Lanesboro, MN 55949

Molloy, Kevin (MPCA)

From: Aron Rolnitzky <aron.rolnitzky@gmail.com>
Sent: Thursday, January 26, 2017 12:59 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Aron Rolnitzky
3405 Chandler Road
Shoreview, MN 55126

Molloy, Kevin (MPCA)

From: Teresa Trampe <teresatrampe@gmail.com>
Sent: Thursday, January 26, 2017 1:03 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a vast amount of water that has been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Teresa Trampe
Thomas Avenue
St. Paul, MN 55104

Molloy, Kevin (MPCA)

From: Barb Powell <barbpowell@charter.net>
Sent: Thursday, January 26, 2017 1:22 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Barb Powell
771 Neville Ct SE
Rochester, MN 55904

Molloy, Kevin (MPCA)

From: Ibrahim Ali <ibrahimjali@icloud.com>
Sent: Thursday, January 26, 2017 1:23 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Ibrahim Ali
3501 27th Ave. S.
Minneapolis, MN 55406

Molloy, Kevin (MPCA)

From: Christine Popowski <cpopowski2009@gmail.com>
Sent: Thursday, January 26, 2017 1:39 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Christine Popowski
2630 Pleasant Ave #101
Minneapolis, MN 55408

Molloy, Kevin (MPCA)

From: Sharon Root <sharonroot@co.lyon.mn.us>
Sent: Thursday, January 26, 2017 1:56 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Sharon Root
504 Fairgrounds Rd.
Marshall, MN 56258

Molloy, Kevin (MPCA)

From: Lauren Young <lolooyo@charter.net>
Sent: Thursday, January 26, 2017 2:05 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Lauren Young
 14507 183rd Ave NW
 Elk River, MN 55330

Molloy, Kevin (MPCA)

From: Christopher Loch <christopherloch@hotmail.com>
Sent: Thursday, January 26, 2017 2:06 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Christopher Loch
2410 Garfield Avenue South
MINNEAPOLIS, MN 55405

Molloy, Kevin (MPCA)

From: Karin Margolis <karinmargolis@gmail.com>
Sent: Thursday, January 26, 2017 2:13 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Karin Margolis
3916 Avondale Street
Minnetonka, MN 55345

Molloy, Kevin (MPCA)

From: Harriet McCleary <mccleary@stolaf.edu>
Sent: Thursday, January 26, 2017 2:18 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Harriet McCleary
2440 Stevens Ave #2
Minneapolis, MN 55404

Molloy, Kevin (MPCA)

From: Brian Major <briker8@gmail.com>
Sent: Thursday, January 26, 2017 2:18 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Brian Major
2726 E 76 St.
Minneapolis, MN 55466

Molloy, Kevin (MPCA)

From: Katherine Bohn <sunshinezombiegirl@gmail.com>
Sent: Thursday, January 26, 2017 2:50 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Katherine Bohn
7000 149th LN NW
Ramsey, MN 55303

Molloy, Kevin (MPCA)

From: Elizabeth Bartlett <bbartlet@d.umn.edu>
Sent: Thursday, January 26, 2017 2:59 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Elizabeth Bartlett
2215 Heather Ave.
Duluth, MN 55803

Molloy, Kevin (MPCA)

From: Cheryl Engel <cherylee@mac.com>
Sent: Thursday, January 26, 2017 3:15 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Cheryl Engel
4933 Nokomis Ave S
Minneapolis, MN 55417

Molloy, Kevin (MPCA)

From: Brad Schmidt <bradleyrschmidt@hotmail.com>
Sent: Thursday, January 26, 2017 3:23 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Brad Schmidt
17 13TH ST NE
Faribault, MN 55021

Molloy, Kevin (MPCA)

From: Philip Rampi <prgconsulting@prodigy.net>
Sent: Thursday, January 26, 2017 3:35 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Philip Rampi
2150 Jefferson Avenue
Saint Paul, MN 55105

Molloy, Kevin (MPCA)

From: graden west <graden@tds.net>
Sent: Thursday, January 26, 2017 3:40 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

graden west
 box 422
 new london, MN 56273

Molloy, Kevin (MPCA)

From: L Carroll <lawern@gmail.com>
Sent: Thursday, January 26, 2017 3:44 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

L Carroll
792 Arlington Ave W
St Paul, MN 55117

Molloy, Kevin (MPCA)

From: Croitiene ganMoryn <adanto@jps.net>
Sent: Thursday, January 26, 2017 4:25 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Croitiene ganMoryn
6211 SE 24th Avenue
Ocala, FL 34480

Molloy, Kevin (MPCA)

From: Heidi Mirka <Heidimirka@comcast.net>
Sent: Thursday, January 26, 2017 4:42 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Heidi Mirka
 2296 119th Lane NE
 Blaine, MN 55449

Molloy, Kevin (MPCA)

From: Alva Pingel <AFPing3@charter.net>
Sent: Thursday, January 26, 2017 4:47 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Alva Pingel
13894 Birchwood Ave
Rosemount, MN 55068

Molloy, Kevin (MPCA)

From: Gretchen Bratvold <gbratvold@usinternet.com>
Sent: Thursday, January 26, 2017 5:43 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Gretchen Bratvold
3444 Edmund Blvd
Minneapolis, MN 55406

Molloy, Kevin (MPCA)

From: Daniel Callahan <may.fly@comcast.net>
Sent: Thursday, January 26, 2017 6:19 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Daniel Callahan
15715 Judicial Road
Burnsville, MN 55306

Molloy, Kevin (MPCA)

From: Anne Griffin-Lewin <griffin-lewin@comcast.net>
Sent: Thursday, January 26, 2017 6:25 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Anne Griffin-Lewin
3401 Central Avenue NE #3
Minneapolis, MN 55418

Molloy, Kevin (MPCA)

From: Marian Severt <mcsevert@gmail.com>
Sent: Thursday, January 26, 2017 6:29 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Marian Severt
11465 Easy Street
Brainerd, MN 56401

Molloy, Kevin (MPCA)

From: Arla Schumack <arlaschumack@gmail.com>
Sent: Thursday, January 26, 2017 7:04 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Arla Schumack
1668 Dayton Ave
St. Paul, MN 55104

Molloy, Kevin (MPCA)

From: Diane Hiniker <dhiniker26@gmail.com>
Sent: Thursday, January 26, 2017 7:28 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Diane Hiniker
147 Bloomquist Mtn. Rd.
Grand Marais, MN 55604

Molloy, Kevin (MPCA)

From: Sharon Powell <infinitee@boreal.org>
Sent: Thursday, January 26, 2017 7:54 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Sharon Powell
2869 county road 7
grand marais, MN 55604

Molloy, Kevin (MPCA)

From: Kaydell Gaasvig <kgasvig@paulbunyan.net>
Sent: Thursday, January 26, 2017 8:16 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Kaydell Gaasvig
P.O. Box 1420
Bemidji, MN 56619

Molloy, Kevin (MPCA)

From: Steven George <roachven7@gmail.com>
Sent: Thursday, January 26, 2017 9:39 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Steven George
 PO Box 535
 Finland, MN 55603

Molloy, Kevin (MPCA)

From: Annah Gardner <ajgardner@stthomas.edu>
Sent: Friday, January 27, 2017 12:28 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Annah Gardner
1906 1st Ave S
Minneapolis, MN 55403

Molloy, Kevin (MPCA)

From: Suzanne Birch <s-jbirch@q.com>
Sent: Friday, January 27, 2017 12:33 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Suzanne Birch
16015 Elgin Court
Faribault, MN 55021

Molloy, Kevin (MPCA)

From: Jane Norling <kmtcomm@gmail.com>
Sent: Friday, January 27, 2017 2:50 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Jane Norling
5450 Ridgewood Cove
Mound, MN 55364

Molloy, Kevin (MPCA)

From: James and Sara Conway <sajacon@q.com>
Sent: Friday, January 27, 2017 3:08 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

James and Sara Conway
4620 Valley DR NW
Rochester, MN 55901

Molloy, Kevin (MPCA)

From: Joseph Wenzel <josephwenzel@msn.com>
Sent: Friday, January 27, 2017 6:53 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Joseph Wenzel
 93 Midwest Ave. N
 Lake Elmo, MN 55042

Molloy, Kevin (MPCA)

From: anna deen <ginkosanjo@gmail.com>
Sent: Friday, January 27, 2017 7:42 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

anna deen
1408 knoll dr
minnetonka, MN 55348

Molloy, Kevin (MPCA)

From: Laura Raedeke <raedekel@gmail.com>
Sent: Friday, January 27, 2017 11:05 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Laura Raedeke
24692 east clark lake road
Nisswa, MN 56468

Molloy, Kevin (MPCA)

From: Solo Greene <solog@nezperce.org>
Sent: Friday, January 27, 2017 11:26 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Solo Greene
PO Box 57
138 Joseph St W
Lapwai, ID 83540

Molloy, Kevin (MPCA)

From: Emily Jarrett Hughes <emily@wisdomdances.com>
Sent: Friday, January 27, 2017 12:12 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Emily Jarrett Hughes
4244 24th Ave S
Minneapolis, MN
Minneapolis, MN 55406

Molloy, Kevin (MPCA)

From: Diane Tessari <dctessa@gmail.com>
Sent: Friday, January 27, 2017 5:01 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Diane Tessari
Eureka Rd
Excelsior, MN 55331

Molloy, Kevin (MPCA)

From: Elinor Ogden <ekogden@q.com>
Sent: Friday, January 27, 2017 10:46 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

Minnesota's tourist economy relies to a great extent on fishing and good fishing relies on clean water. That is why I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Elinor Ogden
 1505 Xanthus Lane
 Plymouth, MN 55447

Molloy, Kevin (MPCA)

From: Michelle Gobely <michelleleg2017@hotmail.com>
Sent: Saturday, January 28, 2017 9:05 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Michelle Gobely
 1581 Wheelock Ln Apt 202
 Saint Paul, MN 55117

Molloy, Kevin (MPCA)

From: Cathie Duncan <cathiedncn@gmail.com>
Sent: Saturday, January 28, 2017 3:09 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Cathie Duncan
1764 Iglehart Ave.
St. Paul, MN 55104

Molloy, Kevin (MPCA)

From: Barb Holznagel <astrablaze@hotmail.com>
Sent: Saturday, January 28, 2017 5:52 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Barb Holznagel
1119 University Dr Lot1424
Bismarck, ND 58504

Molloy, Kevin (MPCA)

From: Tim Wallace <timjwallace@centurylink.net>
Sent: Saturday, January 28, 2017 8:22 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Tim Wallace
8982 Norway Ridge Rd
Zim, MN 55738

Molloy, Kevin (MPCA)

From: Don A. Zatroch <dsscz04@mac.com>
Sent: Sunday, January 29, 2017 12:53 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rule-making process and to protect Minnesota waters.

Don A. Zatroch
2366 - 17th AV NW
New Brighton, MN 55112

Molloy, Kevin (MPCA)

From: Kathryn Null <Kathryn.null@gmail.com>
Sent: Sunday, January 29, 2017 10:02 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Kathryn Null
6125 4th Ave S
Minneapolis, MN 55419

Molloy, Kevin (MPCA)

From: Julie Wissinger <Julieww951@gmail.com>
Sent: Sunday, January 29, 2017 1:52 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Julie Wissinger
951 Nason Hill Rd
Marine on St Croix, MN 55047

Molloy, Kevin (MPCA)

From: Cecilia Lieder <cele@vonrabenu.com>
Sent: Sunday, January 29, 2017 9:53 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Cecilia Lieder
318 N 14th Av E
Duluth, MN 55805

Molloy, Kevin (MPCA)

From: Pamela Martin <pzambert@gmail.com>
Sent: Monday, January 30, 2017 12:13 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Pamela Martin
7144 10th Av S
Richfield, MN 55423

Molloy, Kevin (MPCA)

From: Jean Bixley <mnpearl@aol.com>
Sent: Sunday, January 29, 2017 12:44 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Jean Bixley
32230 Roanoke Street NW
Cambridge, MN 55008

Molloy, Kevin (MPCA)

From: Nancy Montgomery <nkoonemont@aol.com>
Sent: Saturday, January 28, 2017 8:53 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Nancy Montgomery
269 Pleasant Hill Loop Road
Rutherfordton, NC 28139

Molloy, Kevin (MPCA)

From: Carolyn Clements <aloha3791@aol.com>
Sent: Thursday, January 26, 2017 6:36 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Water is Life!

Carolyn Clements
601 Sunset Dr.
Minnetonka, MN 55305

Molloy, Kevin (MPCA)

From: Lydia Garvey <wolfhowlmama@yahoo.com>
Sent: Thursday, January 26, 2017 6:50 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Lydia Garvey
429 S 24th st
Clinton, OK 73601

Molloy, Kevin (MPCA)

From: Carmine Profant <wylodoak@aol.com>
Sent: Thursday, January 26, 2017 6:57 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Carmine Profant
 5500 46th Ave S
 Minneapolis, MN 55417

Molloy, Kevin (MPCA)

From: Marilla MacGregor <pianist4444@yahoo.com>
Sent: Thursday, January 26, 2017 7:45 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Marilla MacGregor
P.O. Box 226
Kasota, MN 56050

Molloy, Kevin (MPCA)

From: John Viacrucis <catchaway@yahoo.com>
Sent: Thursday, January 26, 2017 8:05 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

John Viacrucis
3002 17th St. S Apt. 206
Moorhead, MN 56560

Molloy, Kevin (MPCA)

From: jason husby <jcobainfan@aol.com>
Sent: Thursday, January 26, 2017 10:09 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

jason husby
3531
minneapolis, MN 55412

Molloy, Kevin (MPCA)

From: J Blagen <jblagen@yahoo.com>
Sent: Friday, January 27, 2017 1:23 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

J Blagen
 Rich Rd.
 Minneapolis, MN 55437

Molloy, Kevin (MPCA)

From: Mary Madeco-Smith Madeco-Smith <blaureiterhorse@Yahoo.com>
Sent: Friday, January 27, 2017 12:06 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Mary Madeco-Smith Madeco-Smith
13998 165th St
Little Falls, MN 56345

Molloy, Kevin (MPCA)

From: Andrea Childs <bizwork@aol.com>
Sent: Thursday, January 26, 2017 11:21 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Andrea Childs
2240 Devin Lane
Long Lake, MN 55356

Molloy, Kevin (MPCA)

From: Gary Ivey <grusboy@yahoo.com>
Sent: Thursday, January 26, 2017 10:40 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Gary Ivey

Bend, OR 97702

Molloy, Kevin (MPCA)

From: Rebecca Shedd <Beckysmpls@yahoo.com>
Sent: Thursday, January 26, 2017 7:28 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Rebecca Shedd
4554 Wentworth Ave
Minneapolis, MN 55419

Molloy, Kevin (MPCA)

From: Jerry Witte <arsjerry@yahoo.com>
Sent: Thursday, January 26, 2017 7:30 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Jerry Witte
624 Spear Avenue
Duluth, MN 55803

Molloy, Kevin (MPCA)

From: Timothy Mullen <mullentim13@yahoo.co.uk>
Sent: Thursday, January 26, 2017 7:12 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Timothy Mullen
1272 Richland Avenue
Saint Charles, MN 55972

Molloy, Kevin (MPCA)

From: Gina Marano <eyeindesign@yahoo.com>
Sent: Thursday, January 26, 2017 7:42 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Gina Marano
5300 Vernon Ave
Edina, MN 55436

Molloy, Kevin (MPCA)

From: Tom Glaser <tomglaser@aol.com>
Sent: Thursday, January 26, 2017 8:00 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Tom Glaser
2724 Huntington Ave
Saint Louis Park, MN 55416

Molloy, Kevin (MPCA)

From: Duane Gustafson <degustaf@aol.com>
Sent: Thursday, January 26, 2017 7:43 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Duane Gustafson
9245 Burris Drive
Cook, MN 55723

Molloy, Kevin (MPCA)

From: Steven G <guillojagr@yahoo.com>
Sent: Thursday, January 26, 2017 8:24 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Steven G
Village Woods Dr
Eden Prairie, MN 55347

Molloy, Kevin (MPCA)

From: Gordon Manary <gmanary@yahoo.com>
Sent: Thursday, January 26, 2017 7:40 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Gordon Manary
1416 89th Ave. W
Duluth, MN 55808

Molloy, Kevin (MPCA)

From: Ramona Kopnick <catmischief4@yahoo.com>
Sent: Thursday, January 26, 2017 8:26 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Ramona Kopnick
P.O.Box
Sandstone, MN 55072

Molloy, Kevin (MPCA)

From: Mary Lund <mlund8307@yahoo.com>
Sent: Thursday, January 26, 2017 8:31 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Mary Lund
12200 Marion Lane #5105
Minnetonka, MN 55305

Molloy, Kevin (MPCA)

From: Helen Etnier <Hetnier@aol.com>
Sent: Thursday, January 26, 2017 8:47 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Helen Etnier
11907 Pelican Heights Rd
Ashby, MN 56309

Molloy, Kevin (MPCA)

From: Kimberly Nieman <thaliast.james@yahoo.com>
Sent: Thursday, January 26, 2017 9:25 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Kimberly Nieman
4550 Orchid Circle
Plymouth, MN 55446

Molloy, Kevin (MPCA)

From: Lisa Bey <lbey77@yahoo.com>
Sent: Thursday, January 26, 2017 9:25 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Lisa Bey
32430 355th St
Dent, MN 56528

Molloy, Kevin (MPCA)

From: Michael Blandford <mjblandford@yahoo.com>
Sent: Thursday, January 26, 2017 8:32 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Michael Blandford
1666 Coffman St
Apt 329
Falcon Heights, MN 55108

Molloy, Kevin (MPCA)

From: Chris Turnwall <cjturnwall@aol.com>
Sent: Thursday, January 26, 2017 9:42 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Chris Turnwall
1121 44th Ave. NE
Minneapolis, MN 55421

Molloy, Kevin (MPCA)

From: Patricia Buck <perigee51@ymail.com>
Sent: Thursday, January 26, 2017 8:52 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am requesting a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Patricia Buck
8215 Kelsey Whiteface RD
Kelsey, MN 55724

Molloy, Kevin (MPCA)

From: Linda Bell <lbell3107@yahoo.com>
Sent: Thursday, January 26, 2017 10:03 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Linda Bell
13442
Flagstaff Avenue
Apple Valley, MN 55124

Molloy, Kevin (MPCA)

From: Dr. Kenneth Harris <farblondjet2000@yahoo.com>
Sent: Thursday, January 26, 2017 9:31 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Dr. Kenneth Harris
5099 157th St N
Hugo, MN 55038

Molloy, Kevin (MPCA)

From: Charles Benzie <Cbe1110002@aol.com>
Sent: Thursday, January 26, 2017 9:28 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Charles Benzie
14466 Viking Ave.
Rogers, MN 55374

Molloy, Kevin (MPCA)

From: Sue Halligan <tokyosue@yahoo.com>
Sent: Thursday, January 26, 2017 11:29 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Sue Halligan
1190 Schooner Way
Woodbury, MN 55125

Molloy, Kevin (MPCA)

From: Pam LeBlanc <wildfan3040@yahoo.com>
Sent: Thursday, January 26, 2017 10:13 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Pam LeBlanc
10826 Hawthorn Trail
Woodbury, MN 55129

Molloy, Kevin (MPCA)

From: HEYWARD NASH <HLNASH2006@YAHOO.COM>
Sent: Thursday, January 26, 2017 11:19 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

HEYWARD NASH
 1425 10TH AVENUE
 MINNEAPOLIS, MN 55404

Molloy, Kevin (MPCA)

From: Patricia Shea <pshea2@yahoo.com>
Sent: Thursday, January 26, 2017 11:21 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Patricia Shea
1287 Scheffer Ave
Minneapolis, MN 55436

Molloy, Kevin (MPCA)

From: Heather Ummel <ummelwagner@yahoo.com>
Sent: Thursday, January 26, 2017 12:34 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Heather Ummel
37 North Terrace
Fargo, ND 58102

Molloy, Kevin (MPCA)

From: James Herther <jnherther48@yahoo.com>
Sent: Thursday, January 26, 2017 11:51 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

James Herther
1585 Cohansey St Apt 201
St Paul, MN 55117

Molloy, Kevin (MPCA)

From: Janet Draper <jntdraper@yahoo.com>
Sent: Thursday, January 26, 2017 1:24 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Janet Draper
1825 Dunedin Ave
Duluth, MN 55803

Molloy, Kevin (MPCA)

From: Andrea Sather <andreaduluth@yahoo.com>
Sent: Thursday, January 26, 2017 3:49 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Andrea Sather
2304 Snelling Ave Apt 404
Fosston, MN 55404

Molloy, Kevin (MPCA)

From: Janet Neihart <janeihart66@aol.com>
Sent: Thursday, January 26, 2017 2:29 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Janet Neihart
6751 Geneva Ave. So.
Cottage Grove, MN 55016

Molloy, Kevin (MPCA)

From: kathleen spencer <kaspencer2@yahoo.com>
Sent: Thursday, January 26, 2017 4:04 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

kathleen spencer
315 N Lake Ave #229
Duluth, MN 55806

Molloy, Kevin (MPCA)

From: Dan Wicht <wicht_dan@yahoo.com>
Sent: Thursday, January 26, 2017 2:36 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Dan Wicht
941 Overton Drive Northeast
Fridley, MN 55432

Molloy, Kevin (MPCA)

From: Angela Anderson <pulverfass1946@yahoo.com>
Sent: Thursday, January 26, 2017 1:40 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Angela Anderson
1121 N 4th Street
Stillwater, MN 55082

Molloy, Kevin (MPCA)

From: Mina Blyly-Strauss <digitalmyths@aol.com>
Sent: Thursday, January 26, 2017 5:46 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Mina Blyly-Strauss
3425 Blaisdell
Minneapolis, MN 55408

Molloy, Kevin (MPCA)

From: Christina Krauz <ckrauz@boreal.org>
Sent: Tuesday, January 31, 2017 3:44 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Christina Krauz
280 Pike Lake Road
Grand Marais, MN 55604

Molloy, Kevin (MPCA)

From: Paul Ryals <pcryals@yahoo.com>
Sent: Monday, January 30, 2017 1:46 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Paul Ryals
74 375th Avenue NW
Stanchfield, MN 55080

Molloy, Kevin (MPCA)

From: David Zimney <dzimney@mac.com>
Sent: Tuesday, January 31, 2017 9:22 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

David Zimney
7110 Excelsior Way
St. Louis Park, MN 55426

Molloy, Kevin (MPCA)

From: Sharon Bachman <shari@bachmansphotography.com>
Sent: Wednesday, February 01, 2017 5:32 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Sharon Bachman
13000 Sylvan Ave
Lindstrom, MN 55045

Molloy, Kevin (MPCA)

From: C. John Hildebrand <cjohnhildebrand@yahoo.com>
Sent: Thursday, February 02, 2017 5:25 PM
To: MN_MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

C. John Hildebrand
1212 Powderhorn Terrace
#304
Minneapolis, MN 55407

Molloy, Kevin (MPCA)

From: David Zimney <dzimney@mac.com>
Sent: Thursday, January 26, 2017 4:00 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

David Zimney
7110 Excelsior Way
St. Louis Park, MN 55426

Molloy, Kevin (MPCA)

From: graden west <graden@tds.net>
Sent: Thursday, January 26, 2017 3:40 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

graden west
box 422
new london, MN 56273

Molloy, Kevin (MPCA)

From: Ibrahim Ali <ibrahimjali@icloud.com>
Sent: Thursday, January 26, 2017 1:22 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Ibrahim Ali
3501 27th Ave. S.
Minneapolis, MN 55406

Molloy, Kevin (MPCA)

From: Teresa Trampe <teresatrampe@gmail.com>
Sent: Thursday, January 26, 2017 1:03 PM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a vast amount of water that has been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Teresa Trampe
Thomas Avenue
St. Paul, MN 55104

Molloy, Kevin (MPCA)

From: christine tendle <tine@ineye.com>
Sent: Thursday, January 26, 2017 9:45 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

christine tendle
2435 brenner st
roseville, MN 55113

Molloy, Kevin (MPCA)

From: Sigrid Arnott <sigridarnott@gmail.com>
Sent: Thursday, January 26, 2017 8:39 AM
To: *MPCA_TALU Rulemaking
Subject: RE: Tiered Aquatic Life Uses (TALU) & Modification of Class 2 Beneficial Use Designations

Dear Mr. Bouchard,

I am writing to request a hearing on the Minnesota Pollution Control Agency (MPCA) proposed rules for Tiered Aquatic Life Uses (TALU) and Modification of Class 2 Beneficial Use Designations. Here are my main objections to the proposed rules:

1. The proposed rules would downgrade the classification of 101 stream segments from normal Class 2 uses to "Modified Use" waters, which have lower expectations for the diversity and abundance of fish and aquatic life. The Public Notice for the proposed TALU rules did not say that any water bodies would be downgraded if the rules were approved, let alone more than 100 waters. (SONAR, Attachment A).
2. The MPCA's proposal to downgrade waters to "Modified Use" does not prove that it is not feasible to restore good conditions or that the water body did not have better aquatic life at any time during the past 41 years, which should be required for a use attainability analysis under the Clean Water Act. If the Use Changes were adopted, it seems that a huge batch of waters would be reclassified to "Modified Use" with no more than an aerial image showing that there was drainage before 1975 and a rote statement, "The poor habitat condition cannot be reversed at this time and is not likely to recover naturally due to drainage maintenance." (SONAR, Attachment A).
3. The proposed TALU Rules would only consider today's data in classifying Minnesota streams, including trout streams, as "exceptional." Streams that may have had exceptional quality for trout or other fish at any time during the past 41 years, but have since been polluted or stressed, would be classified as "General Use" rather than managed or restored to support exceptional conditions. (Proposed Minnesota Rule 7050.0222, Subparts 2c, 3c, 4c).

The MPCA background materials say that approximately 53% of stream miles in Minnesota have been modified to change drainage conditions. The downgraded "Modified Use" classification could reduce incentives to protect or restore a huge number waters that have been affected by drainage changes.

I respectfully request a hearing on the TALU proposed rules to shed more light on this rulemaking process and to protect Minnesota waters.

Sigrid Arnott
3620 35th Avenue South
Minnesota, MN 55406