

Annual APM DNR/Industry Meeting

Feedback on Draft Rule Proposals

January 21, 2025

This information is a general summary of all the comments, questions and specific changes brought forth by industry members. The department will collect all comments, questions and changes from all stakeholders through the end of June 2025. After that time the department will consider which changes may be made to the draft rule prior to releasing a first draft of the Board Order with the Economic Impact Analysis.

Feedback on permitting for waters less than 10 acres in size:

- Alternative suggestion: Have permit form adjusted so active ingredient is required instead of the commercial product.
- Alternative suggestion: Allow for amendments on 5-year permits.
 - New species
 - New chemicals
 - Landowner switches companies
 - New waterbodies added to existing permit if on same property.
- Alternative suggestion: Remove requirement for specific applicator license numbers on the permit form. There is a lot of staff turnover from season to season and it would be difficult to amend the permits.
- Alternative suggestion: Stagger issuance of pond permits so they were not all submitted and issued in same year.
 - Some would rather just submit all their permits every 5 years
- Comment: Some disagreement with the categorization of HOA as a shared pond, compared to trusts and corporations with multiple ownership stakes.
- Comment: Concerns for larger private ponds (> 10 acres) that will now be non-private.

- Response: Per our records there are 10-15 waterbodies which would be pulled out of the 1,300 private ponds into non-privates. The <10 acres threshold captures the vast majority of current private pond permits.