

**From:** [Kristina Bloomquist](#)  
**To:** [Lemm, Les P \(BWSR\)](#)  
**Subject:** WCA Rulemaking Comments  
**Date:** Monday, March 14, 2022 3:37:44 PM  
**Attachments:** [image001.png](#)

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Les,

Please see below for my comments regarding WCA.

- Definition of utility: include structures associated with utilities such as lift stations and manholes, as they are necessary for the utility to function.
- Ditch shifting as a form of self-mitigation should be addressed, for example if a road ditch wetland that cannot be proven as incidental is shifted as part of a road widening, no mitigation should be required if the cross section of the proposed wetland will remain the same.
- Minor watershed should be removed from the wetland replacement siting. The BWSR site to search for credits does not provide the minor watershed of the banks, and with the amount of minor watersheds to banks ratio it is unlikely that a bank will be present in the same minor watershed as the impact location.
- Definitions of reasonable and practicable should be defined in the context of section 103G.222, subdivision 3 (d)
- With files being available and stored electronically, the need to retain decisions for only 10 years should be abolished. In perpetuity or as long as the LGU remains in place, would be more appropriate.

Thank you,

**Kristina Bloomquist**

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