

**From:** [Caleb Anderson](#)  
**To:** [Lemm, Les P \(BWSR\)](#)  
**Cc:** [Demmer, David \(BWSR\)](#); [Jeremy A. Williamson](#)  
**Subject:** BWSR's MN 8420 Rule Making  
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Mr. Lemm:

It is my understanding that BWSR is accepting comments for possible changes to MN 8420. Pine County Planning and Zoning staff, who administer WCA on behalf of Pine County, recommend that BWSR consider changing the language contained in 8420.0420 Subp 8(C). The language is cumbersome and difficult to interpret. My interpretation is that item 3 in the bottom of said section, when read at face value, limits all de minimis exemptions to not exceed 400 square feet. If that is the intent, then the language above, providing 10,000 square feet of de minimis exemption for wetland types 1,2,6, and 7 (Subp 8A1a), is essentially meaningless and thus misleading.

Respectfully submitted by:

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