

## 2023 Construction Stormwater Draft Permit Comments

Submitted by: University of Minnesota Facilities Management (Twin Cities & Duluth)

Submission date: 02/02/23

<b>Permit Item</b>	<b>Comment</b>
3.3	Can this be clarified?
4.4	Suggest eliminating b. What happens if a project gets canceled before disturbing 90% of the proposed construction area?
5.11	What is the definition of "adjacent"?
7.3	Everything after the first sentence is not a permit element, but an educational element. Suggest including the additional information in the stormwater manual, a fact sheet, or similar.
11.5	What is the definition of "adjacent"?
11.11.d	Why does this only apply to ground mounted solar panels instead of all pollinator/native prairie installations? Does the 24 month requirement disincentivize pollinator/native habitat?
23.12	Is the 24 hour drawdown required for underground systems or systems that are not subject to solar gain?
25.15	Strongly disagree with exemptions for any type of impervious transportation facility, independent of mode and purpose. Trails receive winter snow and ice maintenance, and some trails are very susceptible to erosion.