



Public Works Department

March 3, 2023

Minnesota Pollution Control Agency
c/o Todd Smith
520 Lafayette Road
Saint Paul, MN 55155

RE: Revisions to Construction Stormwater General Permit

Dear Mr. Smith,

Please see the following comments from the City of Richfield regarding the Draft Construction Stormwater General Permit.

Permit Section	Comment
7.3	Appreciate that the MPCA is recommending wildlife-friendly erosion control products. Richfield supports this change.
9.9	This provision could be difficult to enforce in practice. I could easily see perimeter control BMPs getting buried or damaged if they are put in prior to stockpiling. Would prefer a requirement to install perimeter control immediately after the stockpile is in place.
10.2-10.3	The changes to section 10.2 mostly clarify the recommendations and requirements, which is good, but I strongly object to requiring monitoring every 4 hours – see comment for section 11.9. There also could be a stronger distinction drawn between different types of dewatering operations, for example groundwater pumping for underground utility work versus dewatering of surface waters.
11.5	Clarify and define “adjacent”. Is this only the immediate adjacent properties, or any area close enough to be affected by sediment deposition from runoff from the site? Otherwise approve of this change.
11.9	Strongly object to a requirement for monitoring every 4 hours with no exceptions. Some dewatering operations run continuously, and maintaining a staff member with 24/7 availability to take pictures of dewatering discharges is highly impractical. My suggestion would be to either reduce the required frequency, or have exemptions/reductions contingent on use



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	of certain BMPs for the dewatering discharge.
11.11	Good change, but why not expand this to all sites using pollinator habitat or native prairie as vegetative cover? Incentivizing native plantings is good for long term soil stability.
16.17	Please clarify whether “native undisturbed soils” refers to soils present before excavation, or only to fully undisturbed natural soils. If it is the latter, this provision would prevent infiltration in most urban areas and redevelopment projects, which have heavily modified soils. Either way, I suggest removing or reworking this requirement.

Thank you for the opportunity to provide feedback on the proposed revisions. The City of Richfield looks forward to continued collaboration with the MPCA to protect our water resources. Please let me know if you have questions about any of these comments or would like to discuss further.

Sincerely,

Mattias Oddsson

Mattias Oddsson

Water Resources Engineer

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