

Memorandum

To: Minnesota Pollution Control Agency

From: WSB & Associates

Re: Construction Stormwater General Permit Draft Comments

We appreciate the opportunity to provide comments and questions regarding the draft of the new construction stormwater general permit. Below is our response to the chance to provide public comment.

1. Permit Section 9.9 – The permit states that perimeter controls are required on the downgradient perimeter. If the stockpile is placed on a flat surface area where there is not a change in grade is perimeter control install not required? Can you provide more clarification on these requirements?
2. Permit Section 9.9 – If stockpiling work is temporary, same day for example, are perimeter controls prior to work required?
3. Permit Section 9.9 – Is there a threshold for how large or type of material requires this pre-protection?
4. Permit Section 13.8 – As described during the webinar, please include detailed information in the permit or a fact sheet of what the photo requirements are, such as how many, what needs to be included, etc.
5. Permit Section 13.8 – Are there requirements of how permittees are expected to include the prove of date requirement?
6. Permit Section 10.2 – Is there a threshold of a dewatering amount when photos will be required?
7. Permit Section 10.2 – Depending on the final permit requirements of dewatering monitoring can the MPCA release a fact sheet of what you are looking for when dewatering activities occur to help with compliance as this is adapted?
8. Permit Section 11.11 – Several projects and owner permittees are requiring pollinator habitat or native prairie type vegetated cover that are not solar projects. Can this inspection schedule exception be expanded to include these types of projects that qualify?
9. Permit Section 25.15 – Can the MPCA provide additional clarification of what is considered “distinctly set apart”?

10. Permit Section 11.2 – Would the MPCA consider altering the requirement of rain event inspections of 24 hours over the weekend and/ or holidays given staffing during inactive construction days.