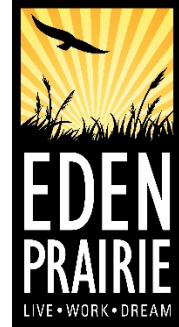


March 3, 2023

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



Re: Comments on Draft Construction Stormwater General Permit

Dear Todd:

Please see the following comments from the City of Eden Prairie related to the MPCA's Draft Construction Stormwater General Permit.

Permit Section	Comment
7.2	What makes it infeasible? Is cost a reason for something being infeasible? This is broad and subject to interpretation.
10.2	There are some sites that must dewater 24/7. This would be a huge cost without a lot of benefit. What about revising to "every 4 hours of operation for the first X hours of operation and for the first Y hours after a Z inch rainfall?"
10.3	In addition to examples of nuisance conditions, suggestions for corrective actions would be helpful here.
11.5	Permittee may not have right to legally access property for inspection or be able to obtain access through reasonable efforts. What should the permittee do then?
11.8	Is it possible that the sediment would require testing? If so, 72 hours will not be adequate.
11.9	See comment for 10.2.
16.12	As sites are redeveloped (especially sites with little separation to seasonally saturated soils), this is going to become increasingly difficult. Is this absolutely essential?
25.15	This is unclear. Does this mean that ONLY sidewalks alongside roadways in residential areas are impervious? (e.g., sidewalks along roadways in industrial or commercial developments are not)

Thank you for the opportunity to provide official comments. Please let me know if you have questions.

Thank you,

Lori Haak
Water Resources Coordinator
lhaak@edenprairie.org