



Capitol Region Watershed District

595 Aldine Street
Saint Paul, MN 55104
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August 12, 2024

Cole Landgraf
MPCA Municipal Division
520 Lafayette Road North
St. Paul, MN 55155

Dear Mr. Landgraf,

As a long-standing partner in surface water quality protection with partially shared geography, Capitol Region Watershed District (CRWD) staff have reviewed the draft City of Saint Paul's proposed Phase I Municipal Separate Storm Sewer System (MS4) permit. CRWD has the following general comments:

CRWD is encouraged to see inclusion of both new and reconstructed impervious surfaces included in stormwater calculations, Section 19.6. Thank you for this important step towards meaningful water quality protection in our highly urbanized landscape.

CRWD continues to recommend a 1.1-inch water quality volume goal for all new and fully reconstructed impervious surfaces in the City of Saint Paul. See MCM5 in Section 19.6. In over 90% of the City, stormwater design as proposed will be dictated by the more restrictive 1.1-inch volume reduction requirement within CRWD and Ramsey-Washington Metro Watershed District Rules. The other 10% of the City will have two different performance goals, with Mississippi Watershed Management Organization operating under the higher MIDS goals, and the West Side of Saint Paul being the only area where the proposed standards would be triggered. When developing CRWD Rules, a very intentional effort was made to provide clear and consistent regulation for both our shared jurisdiction and the development community. The proposed adjustment will provide true consistency to the volume reduction standard.

CRWD urges MPCA to revise the language within MCM5 in Section 19.7 to wholly mirror the requirements for onsite volume reduction and water quality requirements in Watershed District Stormwater Management Rule C, where expenses towards satisfying the requirements need not exceed a predetermined cost cap amount. This is a clearer requirement and provides a reasonable balance between providing meaningful stormwater treatment while balancing the financial and other site challenges that linear projects face. The current provision, "Volume reduction practices are not required if the practices cannot be provided cost effectively" is vague and contradicts District Rules.

CRWD appreciates the opportunity to provide the following additional comments:

Section 3.2: Current language includes residential car washing in the list of authorized non-stormwater discharges. Soap from washing cars is a stormwater pollutant and the public should be encouraged to keep this from our water resources. CRWD recommends incorporating additional efforts/outreach to minimize this discharge within the permittee's Stormwater Management Program (SWMP). Section 15.3 is one possible location.

Section 8.2: Is the Waste Load Allocation information required by this section, to be submitted with the application for permit reissuance, available for review?

Sections 15.4, 15.5, and 15.6: Multi-lingual outreach efforts should include all Minimum Control Measure (MCM) 1 outreach topics (IDDE, smart salting recommendations, and pet waste management.), not just Section 15.3.

Section 16.6: In addition to publishing in a newspaper, CRWD recommends that other electronic media forms be included in the noticing requirements to ensure the greatest reach to interested individuals.

Section 17.1: What is the current IDDE regulatory enforcement mechanism? How is the inspection program implemented? CRWD is interested in collaboration opportunities that would improve efficiencies and benefit both organizations.

Section 20.13: CRWD supports street sweeping as an effective stormwater protection BMP.

Section 20.16: Where is the current stormwater treatment retrofit plan? CRWD encourages collaboration and identifying opportunities to bank credits or cost share on improvements in targeted areas of the city.

Section 30.9: It is unclear if underlying soils are undisturbed/native soils or if fill constitutes underlying soil. CRWD recommends using “underlying materials” in place of “underlying soils” such that both native and fill soils are included in the definition.

Section 30.11: CRWD recommends keeping catch basin/pipe/utility repair/replacement activities in the definition of Fully Reconstructed. This exemption was removed from District Rules in fall 2023 after observing that it was being used more broadly than originally intended, providing less stormwater treatment on street projects.

Section 30.43: CRWD supports the current definition of “water quality volume” to include both new and fully reconstructed impervious surfaces.

CRWD appreciates the opportunity to review and comment on the City of Saint Paul’s draft Phase I MS4 permit. We look forward to continued partnership with the City to ensure programs are efficient and effective in protecting our water resources. Please contact me with any questions.

Sincerely,



Elizabeth Hosch, CESSWI
Regulatory Division Manager
Capitol Region Watershed District

Cc: Sean Kershaw, Saint Paul Public Works Director
Angie Wiese, Saint Paul Department of Safety and Inspection Director
Richard Ekobena, City of Saint Paul Sewer Utility Civil Engineer
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