

August 12, 2024

Cole Landgraf, Environmental Specialist
Minnesota Pollution Control Agency (MPCA)
Municipal Division
520 Lafayette Road
St Paul, MN 55155

RE: Public Comment Period for the City of Saint Paul – Stormwater Permit

Dear Mr. Landgraf,

The City of Minneapolis has reviewed the above referenced stormwater permit and wishes to submit the following public comments.

City of Minneapolis is the only other NPDES MS4 Phase I permit holder besides Saint Paul within the State of Minnesota and is uniquely qualified to provide comments on the proposed City of Saint Paul MS4 permit and the impacts to the core urban environment that makes up the Twin Cities Metropolitan Area.

Sections 17.32 through 17.38: Industrial, Commercial, and Institutional Regulatory Program

The inclusion of a new program for the City of Saint Paul and previously Minneapolis to manage and regulate industrial, commercial, and institutional facilities within its bounds that have possible pollutant exposures for stormwater is a significant burden on limited municipal resources which could lead to an increased cost burden on the City's residents and businesses. This new permit requirement is a substantial increase above and beyond the requirements of the MPCA's Industrial Permit which is more limited in scope based on certain Standard Industrial Classification (SIC) codes. This new requirement has the potential to impact thousands of facilities and will require review and inspections that the city is not staffed or financed for within a limited 36-month timeframe.

The financial burden of a new program, either on the cities of Minneapolis and St. Paul, or on local businesses has not been accounted for by the MPCA. While there are many large businesses within the cities that can easily absorb new permit fees or implement best management practices, there are many small commercial businesses that may struggle with paying a new fee and with understanding and managing the requirements of the new permit language.

The MPCA has indicated that a Statement of Need and Reasonableness (SONAR) is not required except in cases of formal rule making. This new MS4 permit regulation has the potential to be a substantial burden on thousands of businesses located specifically in the Cities of Minneapolis and St Paul and there has been no justification provided from the agency for the establishment of such an unbalanced regulatory environment. This new regulation will impact some of the

most economically disadvantaged parts of the Twin Cities Metropolitan Area without any accounting or analysis of those impacts.

Thank you for providing the opportunity to comment on the City of Saint Paul's NPDES MS4 permit. If you have any questions, please don't hesitate to contact Elizabeth Stout at Elizabeth.stout@minneapolismn.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Angie Craft". The signature is fluid and cursive, with a prominent loop at the end.

Angie Craft
Director, Surface Water & Sewers
City of Minneapolis Public Works

CC: Bryan Dodds, Minneapolis Public Works
Elizabeth Stout, Minneapolis Public Works