

Memorandum

To: Bassett Creek Watershed Management Commission (BCWMC), Next Generation Plan Steering Committee
From: Barr Engineering Co.
Subject: Summary of BCWMC's Current Erosion and Sediment Control Triggers
Date: March 17, 2014
Project: 23270051 PLAN

As part of the Plan update process, the Commission will determine whether to revise the BCWMC's standards and triggers, including those related to erosion and sediment control. This memorandum summarizes the BCWMC's existing erosion and sediment control standards and triggers. The Engineer does not recommend changes to the BCWMC erosion and sediment control standards and triggers.

Summary of BCWMC's Existing Standards and Triggers

Section 7.0 of the BCWMC's *Requirements for Improvements and Development Proposals* (Requirements document) requires an Erosion and Sediment Control Plan for construction projects involving more than 200 cubic yards of cut/fill or 10,000 square feet of disturbance. The Requirements document specifies that the Erosion and Sediment Control Plans must meet the standards given in the NPDES Permit for Construction Activity and the MPCA's *Protecting Water Quality in Urban Areas*, as well as specific standards listed in item 3 of Section 7.0 of the Requirements document.

Comparison of Triggers between BCWMC and Member Cities

The following table compares the triggers for erosion and sediment control performance standards in BCWMC cities (as of 2012) and for the BCWMC. The triggers in the table are simplified for comparison purposes and do not consider specific activities that trigger erosion and sediment control performance standards. Gray shading indicates a trigger that is equal to or more restrictive than the BCWMC trigger:

City/WMO	Cut/Fill Trigger (cu. yd.)	Area Trigger (sq. ft.)
BCWMC	200	10,000
Crystal	application for building permit	
Golden Valley	--	4,000
Minneapolis	5	500
Minnetonka	50	5,000
Medicine Lake	200	10,000
New Hope	50	15,000
Plymouth	50	--
Robbinsdale	25	100
St. Louis Park	50	5,000

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The BCWMC's existing triggers for erosion and sediment control are generally less restrictive than those of the member cities. As such, the BCWMC process lends a second layer of oversight to larger projects, while not duplicating all city efforts.

The reference to the MPCA's *Protecting Water Quality in Urban Areas* included in Section 7.0 of the Requirements document may be out of date; a reference to the *Minnesota Stormwater Manual* may be more appropriate, as this (on-line) document is updated semi-regularly. Reference to the NPDES Construction Stormwater Permit in the BCWMC's Requirements document is appropriate, as the NPDES Construction Stormwater Permit was recently updated. The BCWMC's existing disturbed area trigger (10,000 square feet) is less than the 1 acre of disturbance trigger in the NPDES Construction Stormwater Permit. Note that the BCWMC trigger is not intended to supersede additional triggers within the NPDES Construction Stormwater Permit (i.e., triggers for Permanent Stormwater Management System standards specified in Section III.D of the NPDES Construction Stormwater Permit). For example, NPDES Construction Stormwater standards applicable to sites with more than 1 acre of impervious area would not be applicable to projects meeting the BCWMC trigger, but having less than 1 acre of impervious area.