

Response to Stakeholder Comments on the 2019 Draft
NPDES Stormwater Permit No. GAS000XXX
Phase I Large MS4

Permit Section	Comment Received	EPD Response
Part 2.1	Commenter requested that the Receiving Water Standards narrative be kept in the permit template. Clarify why the language in this section of the permit was removed.	EPD revised the permit to reference the Water Quality Rules and Regulations, citing 391-3-6-.03(5), to keep the permit current with any future update to the general criteria. No change made.
Part 3.3	Commenter requested that the phrase “to the extent possible” be added to the sentence which discusses the SWMP component requirements.	Each SWMP table element must be addressed by the permittee in a clear and measurable manner. No change made.
Part 3.3	Revise the first sentence to remove the word “should” and add “tracking” to the second sentence.	Section has been modified to include the requested changes.
Table 3.3.1.(1)(b)	Clarify the difference between the reporting period and the annual report	Part 4.1 defines the reporting period as May 1 through April 30. The annual report is required to be submitted by the permittees by June 15 th following the reporting period.
Table 3.3.1.(1)	List each MS4 structure type added during the reporting period; require the MS4 control structure inventory to be provide in a GIS database	The permit specifies the four minimum structures required for the inventory (i.e., catch basins, ditches, detention/retention ponds, and storm drain lines). Some permittees may choose to include more structure types. The annual report requires the permittees to list the structures added and includes an “other” category. Permittees use a variety of acceptable methods for tracking inventories, and these methods may change during the permit term in response to permittee needs. Therefore, the permit does not specify the inventory format.
Table 3.3.1(3)	Recommend that reviewing/updating comprehensive plans and also, an update or establishment of a greenspace plan to improve water quality and protect against flooding be a requirement in the permit that will be implemented by a specific date.	This BMP refers to the Department of Community Affairs comprehensive plan, which covers many topics beyond the scope of stormwater. Comprehensive plans are developed or updated on varying schedules. No change made.

Table 3.3.1(4)	Recommend that a systematic street litter removal program be developed and adopted within the permittee's jurisdiction; permit should define timing.	The permit requires permittees to conduct street maintenance and cleaning at a frequency of at least one mile per reporting period, or, if the permittee does not engage in street sweeping, then they must implement an alternate method, such as litter removal. The permit states that this alternate method must be completed at least once per reporting period. Permittees may choose whether to implement street sweeping procedures or an alternate method, such as a litter removal program. No change made.
Table 3.3.1(5)(a)	Define if the flood management projects referenced are permittee-owned. Does this also include privately-owned projects?	For proposed flood management projects, the permittee must evaluate both permittee-owned and privately-owned. For existing retrofit projects, the permittee must conduct an assessment for only permittee-owned projects.
Table 3.3.1(6)(b)	Recommend that permittees be required to develop a Stormwater Plan or Stormwater Pollution Prevention Plan (SWPPP) for its municipal operations; provide documentation of follow-up actions taken to address any problems with compliance.	Permittees may require municipal facilities to develop the referenced plans. Last sentence of section has been modified to require documentation of follow-up actions taken in response to the inspection. Permittees are required to address any identified issues in accordance with their Enforcement Response Plan.
Table 3.3.1(7)(b)	<p>Commenter requested that a clarification of the specific Georgia Department of Agriculture (GDA) training required be added to the Permit regarding pesticide, fertilizer, and herbicide application (PFH) certification</p> <p>Recommend that permit require permittees to develop and implement a PFH program within three years; add a requirement to implement a pet waste program</p>	<p>Per the Permit, if municipal staff perform application of PFH, they must be certified by the GDA. Specific information about GDA requirements can be found through GDA. No change made.</p> <p>Table 3.3.1(7)(b) of the permit requires permittees to implement a program to reduce pollution caused by the municipal use of PFH. Permittees may choose to implement a PFH or pet waste program for the public as well through their public education component. No change made.</p>
Table 3.3.2(3)	Commenter requested that permittees be allowed to perform both standard dry weather screening (DWS)	This section has been modified to include the requested option.

	and DWS during stream walks in the same Storm Water Management Program (SWMP).	
Part 3.3.2 Illicit Discharge Detection and Elimination (IDDE)	Recommend a specific statement or include a reference to provide guidance on how to determine whether a non-stormwater discharge or flow is a significant contributor of pollutants to the MS4; add illegal dumping as an illicit discharge; add a requirement to complete an IDDE program effectiveness evaluation and assessment to identify improvements to the IDDE Program and update the IDDE Program in response to the evaluation at last once during the permit term.	The permit lists the categories of non-stormwater discharges and specifies that those discharges shall be addressed where the municipality identifies them as sources of pollutants, consistent with 40 CFR 122.26(d)(2)(iv)(B)(1). EPD is unaware of any guidance from EPA addressing this determination. If such guidance is developed, EPD would share it with permittees. Illegal dumping is primarily addressed as a provision in the permittee's IDDE ordinance. The permit requires permittees to re-evaluate and modify its IDDE ordinance when necessary for permit compliance each reporting period. If the permittee determines that it needs to modify its IDDE Program, the permittee must submit the proposed changes to the Division. No changes made.
Table 3.3.3(2)(a)	Recommend that the permittee provide for legal authority in its ordinances for commercial and industrial facilities to develop SWPPP and to be able to enforce compliance.	All industrial facilities with a Notice of Intent under EPD's Industrial Stormwater General Permit (IGP) are required by that Permit to have a SWPPP. Facilities with a No Exposure Exclusion under EPD's IGP are specifically exempted from developing a SWPPP under the IGP. Both facility types must be included on the MS4's industrial facility inventory. The goal of this component is to implement and enforce a program to control pollutants in stormwater discharges from industrial facilities into the MS4. Permittees can utilize their ordinance provisions, including their IDDE ordinance, and ERP to enforce this program.
Table 3.3.3(2)(b)	Commenter requests guidance on implementation of a monitoring program for stormwater runoff from various types of industrial facilities; What about facilities that have not applied for coverage under the Industrial General Permit (IGP)? Can No Exposure Exclusion (NEE) facilities be deleted from the	Per the Division's SWMP guidance document, the permittee's monitoring program must include a description of how the program will be implemented (e.g. frequency of monitoring, sample location, parameters to be analyzed, etc). Many facilities with coverage under the IGP conduct benchmark monitoring

	<p>industrial inventory requirement?</p> <p>Recommend the permit provide a specific measurable requirement for the components of the monitoring program for Stormwater runoff; minimum inspection/monitoring requirements need to be described.</p>	<p>annually or quarterly and can furnish some analytical results to the MS4 characterizing their stormwater discharges. In addition, all annual reports submitted to EPD under the IGP are available for review through the Georgia EPD Online System Public Portal. This information can be used by the MS4 in combination with other data to help meet their monitoring requirements. As specified in Table 3.3.3(2)(a), NEE facilities must be kept on the permittee's industrial facility inventory. If the permittee is aware of a facility that does not have coverage under the IGP within its jurisdiction, the permittee should inform EPD. If the facility is not eligible to be covered under the IGP, the permittee may want to categorize it as a Highly Visible Pollutant Source.</p>
Table 3.3.3(3)	<p>Recommend adding a requirement that the MS4 adopt an ordinance that establishes a requirement for industries and highly visible pollutant sources to develop and implement BMPs to minimize pollutants in Stormwater discharges; recommend documentation for any enforcement action taken including penalty amount.</p>	<p>Stormwater BMPs are often industry and site specific. Permittees can utilize their ordinance provisions and ERP to enforce compliance with their ordinances, such as their IDDE ordinance, to ensure that pollutants are not discharged from industrial facilities to the MS4. The permit requires permittees to provide documentation on any enforcement action taken during the reporting period in each annual report. Not all enforcement actions taken may result in a penalty. No change made.</p>
Table 3.3.4(2)(a)	<p>Recommend that the permit require a developer and/or consulting engineer pre-meeting prior to the onset of any new development or redevelopment project.</p>	<p>The permittees are required to implement site plan review procedures to ensure that projects comply with the erosion and sedimentation and post-construction stormwater ordinances. Pre-meetings or concept meetings may make the process more efficient for some permittees, but will not result in a change to the minimum site plan requirements. No change made.</p>
Table 3.3.4(3)(b)	<p>Regarding the inspection program, replace "active construction site" with "permitted construction site".</p>	<p>Change made. EPD believes that this change sets a measurable reporting period requirement that might otherwise be</p>

	<p>Permit is becoming less stringent by reducing the inspection requirement at least three times during the construction process to an inspection of the site only one time each year; recommend adding a final site stabilization inspection 6 months after completion.</p>	<p>missing. The intent of this change is to set a minimum measurable requirement for each reporting period while acknowledging that construction does not follow the MS4 permit reporting period. A construction site that completes the initial installation of BMPs on the last day of the reporting period could potentially stretch over many years, meaning that there may be no annual inspection. For example, if the installation of initial BMPs happened during the 2019-2020 reporting period, and the active construction and final site stabilization inspections happened in the 2021-2022 reporting period, it would be possible for the site to receive no inspections in the 2020-2021 reporting period.</p> <p>Furthermore, additional minimum construction inspection tasks and frequencies are established in the Manual for Erosion and Sediment Control in Georgia and in the requirements for Local Issuing Authority certification. Because these tasks and frequencies are regulated by another program, the MS4 Permit has been modified to focus on a specific minimum measurable requirement for each reporting period. No change made.</p>
Table 3.3.4(3)(b)	<p>Recommend that the permit require public education on construction site management of sediment and a procedure for the public to report soil/erosion problems; inspection program should require control of onsite waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste.</p>	<p>Permittees may elect to develop a public education program for construction site management of sediment. However, permittees are already required to implement procedures for receiving and responding to complaints, which includes soil/erosion complaints. Complaints are handled via telephone, email, website link, etc.</p> <p>The CGPs include the requirement to control waste and to minimize exposure of products, including but not limited to building materials, construction wastes, fertilizers, herbicides, and detergents. By ensuring compliance with the CGPs, the inspectors will address these waste control issues, in addition to any erosion and sedimentation issues. No changes made.</p>

Table 3.3.4(4)(a)	Recommend that documentation for any enforcement action taken including penalty amount	The permit requires permittees to provide documentation on any enforcement action taken during the reporting period in each annual report. A penalty may not be assessed for all enforcement actions. No change made.
Table 3.3.4(5)(a)	Recommend that MS4 construction site inspection staff be required to obtain a minimum number of continuing education credits each year	Per the Georgia Erosion and Sedimentation Act, person involved in land development design, review, permitting, construction, monitoring, or inspection or any land-disturbing activity shall meet the education and training certification requirements as developed by the Georgia Soil and Water Conservation Commission (O.C.G.A. 12-7-19(a)(1)). These certifications must be renewed on a regular basis, ensuring that inspectors are keeping current with new permitting, technical, and regulatory information. No change made.
Part 3.3.6	The initial Enforcement Response Plan (ERP) was due on June 15, 2015. Why does the text state that the ERP must be implemented within six months of EPD approval.	The draft permit requires the permittee to review its ERP each reporting period and revise as necessary. If the ERP is revised during the reporting period, it must be submitted to EPD for review. The revised ERP must be implemented within six months of EPD approval.
Part 3.3.7	Recommend removing the words “the data assessment should include” and replace with “the data assessment shall include”.	The requested modification has been made.
Part 3.3.8	Define which employees should receive stormwater related training Recommend that the permittees professional Stormwater staff be required to obtain a minimum number of continuing education credits each year	The permit requires that training address stormwater topics as necessary for an employee to do his or her job. The permittees must state within their SWMP the employees that will be required to attend the training (i.e., first responders, erosion & sedimentation staff, public works, etc.). Currently, there exists no required certification or training program for stormwater staff, outside of those required for erosion and sedimentation control staff. By requiring that the MS4 provide annual training for MS4 staff, the permittee ensures that staff are kept up to date

		on new permitting, technical, and regulatory information, while allowing information to be tailored to that specific MS4. No change made.
Part 3.3.9	<p>Commenter requested that the topic of Fats, Oils, and Greases (FOG) be added to the suggested list of public education topics that a municipality should consider</p> <p>Recommend “shall consider” instead of “should”; recommend adding “pet waste” to the topics to be considered.</p> <p>Recommend that the State establish a goal for the public education program; recommend setting a performance standard (i.e., specify the percentage of the MS4 population that must be reached each reporting period); recommend that once in the permit period an evaluation of the effectiveness of the public education program be documented.</p>	<p>FOG has been added to the suggested list of topics.</p> <p>The requested modifications have been made.</p> <p>EPD believes that this recommendation is being met by the current proposed language. A measurable goal must be specified for each activity by the permittee, and the details and documentation of each activity implemented must be provided with the annual report. Each reporting period, permittees are required to evaluate their existing program and revise if necessary. No changes made.</p>
Parts 3.3.9 & 3.3.10	Commenter states that a discrepancy exists regarding the number of activities required and the frequency	The minimum number of public education and public involvement activities that must be completed during each reporting period has been established in the permit, based on the permittee’s population (i.e., either 2 or 4 activities). The permittee must include the chosen activities within its revised SWMP.
Part 3.3.10	<p>Editing typo, delete reference to the public education program and replaced with public involvement in the second paragraph.</p> <p>Add a requirement that the permittee establish a Stormwater/GI/LID Advisory Committee; add a requirement that the permittee provide education and public involvement opportunities for minority or disadvantaged communities; recommend that public involvement opportunities be highlighted on the MS4 website.</p>	<p>The requested modification has been made.</p> <p>The draft permit lists stakeholder advisory committees as a suggested activity.</p> <p>EPD agrees that reaching minority and disadvantaged communities is important. The intent of the public education and involvement programs is to create opportunities for all citizens to participate in the</p>

		<p>SWMP. The word “all” has been added to the permit to emphasize the comprehensive nature of this requirement.</p> <p>The MS4 is required to post the SWMP on their website, if they have a website, so the public involvement program will be readily accessible for the public. For highlighting specific public involvement opportunities, MS4s may find other methods, such as social media, billing inserts, or advertisements, to be more effective for reaching their citizens. Furthermore, the method of highlighting the public involvement opportunity may depend on the type of opportunity. MS4s can determine the most effective way to highlight public involvement opportunities through their annual evaluation of BMP effectiveness.</p>
Part 3.3.11(a)(1)	<p>Recommend that within the first two years of the permit term that the MS4 be required to re-evaluate its ordinances and comprehensive zoning plans to identify barriers to the implementation of GI/LID</p> <p>Recommend that the ordinance provide for development and redevelopment projects to provide post-construction maintenance schedules and also an enforcement mechanism to provide for penalties when post-construction controls are not maintained.</p>	<p>Table 3.3.11(b)(2)(1)(a) of the permit requires the permittees to continue to review and revise, where necessary, building codes, ordinances, and other regulations to ensure that they do not prohibit or impede the use of GI/LID practices.</p> <p>Per the permit, the ordinance must provide the permittee the authority to conduct plan reviews, inspections, enter into inspection and maintenance agreements, and pursue enforcement. This provides a mechanism to ensure post-construction controls are maintained.</p>
Part 3.3.11(a)(2)	<p>Clarify if the performance standards apply to single-family residential structures that are greater than 5,000 square feet.</p> <p>Recommend that the permit require a developer and consulting engineer pre-meeting prior to the onset of</p>	<p>The performance standards apply to any new development or redevelopment, including single family residential structures, that meet the criteria in 3.3.11(a)(2).</p> <p>This comment was provided twice, for two different sections of the permit, and addressed in the response for</p>

	any new development or redevelopment project.	Table 3.3.4(2)(a).
Part 3.3.11(a)(2)	For Stormwater Runoff Quality/Reduction, the more exact way of providing water quality volume, would be to use a 1.2 multiplier for the remainder of runoff that cannot be reduced onsite.	The language in the permit is consistent with the Runoff Reduction Standard in the GSMM. MS4s may choose to exceed the performance standards listed in the GSMM, but at a minimum, they must meet those standards. No change made.
Part 3.3.11(a)(2)	<p>Commenter recommends the State provide the criteria/process for evaluating the feasibility or infeasibility of the onsite retention requirements in the permit (could reference State guidance document) so that it is uniformly applied across Georgia.</p> <p>A commenter indicated that the criteria used to demonstrate that the stormwater runoff quality/reduction standard is not feasible should be outlined in the permit, as opposed to permittees being allowed to make their own determination.</p>	Feasibility must be evaluated on a project by project basis based on the project specifications, unique site conditions, and local zoning and development requirements. By providing MS4s with the flexibility to develop their own feasibility criteria, the permit allows the development of a program that is responsive to local development code and unique local conditions. No change made.
Part 3.3.11(a)(2)	A commenter recommends that the State require that the MS4 develop and implement non-structural best management practices including better site design, greenspace planning to set aside floodplains, wetlands and larger buffers; conservation subdivision ordinance adoption, etc.	Information about these practices is available through the GSMM. MS4s are already evaluating site design through the GI/LID program, where they continue to review and revise, where necessary, building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices. No change made.
Part 3.3.11(a)(2)	Commenter states that the Phase I Medium and Phase II permittees were given three years from the permit reissuance date to adopt the runoff reduction performance standard.	The reason for delaying adoption of the runoff reduction performance standard was to allow additional time for training, coordination, and program modification for permittees. The GSMM was revised in February 2016, and with the Phase I Medium and Phase II Small reissuances, a number of training opportunities and resources have been developed. To accommodate additional time for training, coordination, and modification to the program, the implementation date has been changed from June 11, 2020 to December 10, 2020. All MS4 permittees will be required to use

		Option (a) to achieve compliance with the performance standard in 2020.
Part 3.3.11(a)(2)	Commenter recommends requiring annual training rather than “encouraging” training for all site plan reviewers, construction site inspectors and other MS4 personnel involved in MS4 Stormwater management.	The training referred to in this section of the permit is specific to any necessary preparation for implementing Option (a) in the Stormwater Runoff Quality/Reduction standard. This language was added to reflect requests for additional time in implementing Option (a) to allow for sufficient preparation. No changes made to the permit.
Part 3.3.11(a)(2)	A commenter recommends a requirement to form a Stormwater Advisory committee to assist with the evaluation and removal of barriers to GI/LID implementation to assist with the effective roll-out of the new retention requirements.	The GI/LID program requirements were in place during the previous permit iteration (Effective June 11, 2014). Based on the time allowed to create a GI/LID program and inventory associated structures, there should not be many remaining barriers to GI/LID implementation. However, the permittee must continue to review and revise, where necessary, the building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID. An MS4 can choose, under its public involvement program, to develop a Stormwater Advisory Committee for this or other SWMP implementation purposes. No change made.
Part 3.3.11(a)(2)	Commenter requests guidance on the trout stream protection performance standard; Does this apply to waters designated as secondary trout streams?	The SWMP must include a description on how the permittee will address the protection of trout waters from MS4 outfalls due to elevated temperatures. This applies to all trout streams, including secondary trout streams.
Part 3.3.11(a)(2)	Commenter recommends that the State define predevelopment. Without a common definition for predevelopment in Georgia, the unified Stormwater sizing criteria requirements are not “uniform”. Without the standardized definition for predevelopment, the unified sizing criteria for Stream Channel/Aquatic Resource Protection, Overbank Flood Protection and Extreme Flood Protection will differ across Georgia, and, therefore, not be uniform.	MS4s can specify the pre-development rate as natural or existing conditions, as applicable. By setting existing conditions as a baseline, the permit ensures that new and redevelopment does not contribute to water quality degradation. MS4s can choose to be more protective and implement a predevelopment definition of natural conditions. No changes to the permit.

	Allowing each jurisdiction to define predevelopment results in some communities with more favorable, easier to achieve best management practice requirements for new development and redevelopment.	
Part 3.3.11(a)(3)	Commenter states that the requirements for linear transportation projects should be deleted or optional.	The linear transportation project requirements are included in the permit as an optional activity. No change made.
Part 3.3.11(b)(2)	Commenter states that the minimum inspection requirement included within the Permit for permittees' green infrastructure/low impact development (GI/LID) structures could lead to the improper functioning of the structures.	The permit includes an annual minimum inspection frequency. Permittees may conduct inspections more frequently if preferred or as detailed for a specific GI/LID structure. Additional maintenance information for individual BMPs, including a schedule for specific maintenance activities, can be found in the GSMM, Appendix E, Operations & Maintenance Guidance Document. No change made.
Part 3.3.11(b)(2)	<p>A commenter recommended that the State require that a comprehensive re-review of ordinances and ordinance revisions to remove barriers to GI/LID be completed within the first 2 years of the permit term to help with effective implementation of GI/LID.</p> <p>Also add requirements that the GI/LID program legal authority provide for mechanisms to enforce maintenance requirements when privately-owned non-residential GI/LID structures are inspected and found not maintained.</p>	<p>The GI/LID program requirements were in place during the previous permit iteration (Effective June 11, 2014) and an ordinance review was a part of the Phase I Large permit issued in June 2014. Based on the time allowed to create a GI/LID program and inventory associated structures, there should not be many remaining barriers to GI/LID implementation. However, the permittee must continue to review and revise, where necessary, the building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID.</p> <p>Under 3.3.11(a)(1), The permittee must adopt or update a post-construction ordinance, which provides the permittee the authority to enter into maintenance agreements and pursue enforcement. This would address all post-construction controls, including GI/LID. No change made.</p>
Part 3.3.11(b)(2)	Commenter recommends that the State require permittees review and update their GI/LID program's	The permittee can update the GI/LID program at any time and resubmit the program to EPD for review. The

	<p>structural and non-structural best management practices to improve the program's effectiveness.</p> <p>Recommend that the State provide guidance on evaluating the feasibility and site applicability of different GI/LID techniques and practices so that the implementation of the requirement is consistent/uniform across the State. This will also ease the burden on MS4's to develop their own feasibility evaluation process.</p>	<p>permittee must also evaluate the effectiveness of each program element with each annual report. Instead of setting a specific schedule, EPD will rely on these two mechanisms to inform when GI/LID program reviews and updates occur.</p> <p>The feasibility evaluation and site applicability of different GI/LID techniques and practices has been completed and submitted to EPD for review on June 15, 2017, with the 2016-2017 annual report. In addition to EPD's review of submitted GI/LID programs, the GSMM provides information about GI/LID structures and techniques, including site feasibility criteria, and can be used as a reference.</p>
Part 3.3.11(b)(2)	Commenter recommends a requirement that the GI/LID inventory be placed in a GIS electronic database.	The current documentation process (inventories and maps) is sufficient for EPD to assess permit compliance. EPD will continue to evaluate documentation requirements in the future. No change made
Part 3.3.11(b)(2)	A commenter recommends a requirement to adopt an ordinance to enforce the maintenance of the post-construction controls when maintenance does not occur as needed.	Under 3.3.11(a)(1), The permittee must adopt or update a post-construction ordinance, which provides the permittee the authority to enter into maintenance agreements and pursue enforcement. This would address all post-construction controls, including GI/LID.
Part 4.1	Commenter requests that the annual report requirement be reduced to 2 -3 reports per permit cycle; add caveat that states if the permittee is unable to submit annual reports electronically, then failure to submit is not a permit violation.	The Code of Federal Regulations, Title 40, Part 122.42(c) requires that Phase I Large permittees submit annual reports. When the electronic method of reporting is available, the permittees will be required to submit the annual report electronically upon EPD notification. No change made.
Part 4.1.	A commenter recommends a revision to: "A summary of the annual report requirements as found in this permit including:"	The summary of annual report requirements comes from 40 CFR Part 122.42(c). No changes to the permit.
Part 4.1.6	A commenter recommends a revision to: "and public	The summary of annual report requirements comes

	education and public involvement programs.”	from 40 CFR Part 122.42(c). This bullet list of requirements is a summary and not inclusive of all annual report components. No changes made to the permit.
Text under Part 4.1.7	Replace “all structures and facilities” with “all permittee-owned structures and facilities” for the inspection permit requirement.	The inspection requirement also refers to requirements under 3.3.3 (Industrial Facility Stormwater Discharge Control) and 3.3.5 (Highly Visible Pollutant Sources) and 3.3.11(b) (Green Infrastructure/Low Impact Development (GI/LID)), all of which can, and often do, include non-permittee-owned structures. To clarify, the word “required” was added in front of “structures” to indicate that only structures and facilities required by the various permit sections fall under this requirement.
Appendix A Definitions	Add a definition for reporting period	The reporting period is defined in Part 4.1 (i.e., May 1 – April 30).
Appendix A Definitions	Add a definition for Flood Management Projects	Flood management projects are defined in Table 3.3.1(5)(a).
Appendix A Definitions	Maximum Extent Practicable – the commenter states that the permit definition is broad and vague; clarify the definition so that it matches its uses throughout the permit.	The definition in the Permit is consistent with the MEP definition in the Phase I Medium and Phase II Small Permits. No change made.
Appendix A Definitions	Add a definition for Non-Structural Controls	EPD believes that the terms structural and non-structural controls are commonly used and understood. These terms are used in their common meaning in the Permit.
Appendix A Definitions	Clarify the definition for Redevelopment	The Text “on a previously developed site” has been added to the end of the first sentence. This is consistent with the GSMM redevelopment definition.