Response to Comments on the 2016 Draft
General NPDES Stormwater Permit No. GAR041000
Georgia Department of Transportation (GDOT)

Page	Permit Section	Comment	Response
14	4.2.5.1	The commenter stated that shoulder paving and driveway access paving should be considered "site development projects", thereby becoming subject to the performance standards in Section 4.2.5.1(a).	Shoulder paving and driveway access paving include minimal land disturbance and the creation of a limited amount of new impervious surface. No change was made.
14-15	4.2.5.1	The commenter requested that projects that have only received concept approval not be exempt from complying with the performance standards in Section 4.2.5.1(a).	GDOT is required to comply with the performance standards in Section 4.2.5.1(a) of the 2012-2017 permit iteration. These projects proposed for the exemption have already had funding allocated based on the current design. EPD recognizes the challenge in requiring the re-design of existing projects, which would in many cases require substantial additional costs. The original language was retained.
14-15	4.2.5.1	The commenter indicated that the 365 days to allow GDOT to obtain concept approval was too long.	The 365 days is not the period to obtain concept approval. The 365 days is to provide a grace period for those projects that have already received concept approval to comply with the existing performance standards in the 2012-2017 permit, which will prevent the project having to undergo an expensive re-design. The original text was retained.
16	4.2.5.1(a)	The commenter indicated the volume for runoff reduction should be revised to the 1.2-inch volume contained in the previous 2012-2017 permit.	The Georgia Stormwater Management Manual was revised in 2016. The permit has been revised to incorporate the updated standard which requires GDOT to retain the first 1.0-inch of rainfall on site. Removal of ~100% of pollutants via infiltration is approximately mathematically equal to removal of 80% of

			pollutants from 1.2 inches. This is in keeping with the national movement towards infiltration and green infrastructure practices. No change was made.
16	4.2.5.1(a)	The commenter requested that a term other than "maximum extent practicable" be used in reference to volume reduction.	The permit language requiring "maximum extent practicable" is consistent with 40 CFR 122.34(a), and with other MS4 permits in Georgia. No change was made.
17	4.2.5.1(b)	Two commenters stated that the exemptions provided for determining infeasibility were too broad.	GDOT implements an EPD-approved program to determine infeasibility. An infeasibility study is submitted to EPD with each project, which EPD reviews and has the authority to disapprove. The infeasibility study requires an evaluation to determine what practices can be done within the confines of a linear project. The listed exemptions provide a framework for the evaluation. No change was made.
19	Table 4.2.5.4	A commenter stated that post-construction structures that incorporate green infrastructure should be inspected annually and after major storm events.	GDOT conducts inspections and maintenance of GI/LID structures at the same frequency as other post-construction structures. To clarify this, BMP 1.d has been added to Table 4.2.5.4. The number of facilities and the area that GDOT must cover is much more extensive than within one municipality. Due to resource availability, EPD considers the current rate of inspection to be acceptable and an increased frequency will not be required.
19	4.2.5.4	A commenter stated that GDOT should be required to evaluate green infrastructure practices prior to using traditional stormwater practices.	For each project, GDOT conducts a feasibility study which evaluates the use of green infrastructures. Only in the event that the use of green infrastructure is determined to be infeasible, are traditional stormwater structures used. The current wording was retained.
21	Table 4.2.6, BMP 4(a)	A commenter indicated that BMP #5(b) provides a 365 day delay in inspecting the MS4 structures located in areas newly	GDOT conducts mapping and inspection of the MS4 structures concurrently. To clarify that these tasks are performed at the same time,

		designated and added to GDOT's area with the Permit renewal in 2017. However, BMP 4(a), which addresses mapping of the structures, does not provide this delay.	BMP 4(a) has been revised to include language providing for a 365 day delay in mapping those areas newly added to GDOT's responsibility with the 2017 Permit renewal.
23	5.1	A commenter requested that the electronic database be accessible by the public.	The electronic reporting requirement is federally mandated. Once the database is operational, it will be publicly accessible.
NA	NA	A commenter stated that the post-construction requirements should also apply to existing projects.	The Phase II regulations, 40 CFR 122, apply to new development and redevelopment projects. Adding post-construction structures to existing highways would be cost-prohibitive and in many cases, physically impossible. The original language was retained.
NA	NA	A commenter indicated that the long-term maintenance of green infrastructures is a concern and requested a delay in implementation.	All MS4 structures, whether a conveyance structure, a post-construction structure, or a green infrastructure structure require maintenance. A delay in implementing a green infrastructure program will not address this problem. The permit requires a program to address inspection and maintenance of GI/LID structures. Table 4.2.5.4, BMP 1.d, was added to clarify the inspection and maintenance frequency for GI/LID structures.
NA	NA	Require Green Infrastructure Best Management Practices along all GDOT Roadways	The Post Construction regulations (40 CFR Part 122.34(b)(5)) only address new and redevelopment projects and do not require retrofit of existing development. The current permit requirements represent control of pollutants to the maximum extent practicable. In future iterations, these requirements may change.