

PSE Comments

2015 Construction Stormwater General Permit Update

- The Construction Stormwater General Permit (CSWGP) should be streamline for ‘Common Plan of Development’ work that requires utility relocation work (e.g., street widening, sidewalks, bridges, etc.)
 - The current permit process does not support the timely response of utilities to address conflicts during road improvements. Conflicts often develop suddenly and can require quick response; otherwise safety issues and delay of publicly funded projects can result. The 65+ day process to obtain CSWGP coverage does not allow utilities to meet this obligation.
 - Generally, utility relocation work disturbs small areas compared to the road improvements
- Consider add a definition in the CSWGP for Public Improvement project, which can be the basis for a more streamlined process for coverage. The public agency responsible for the road improvement may choose to grant a partial transfer to utilities. Otherwise,
- Consider developing a programmatic or blanket permit for utility work, similar to the Georgia approach which identifies primary, secondary and tertiary permittees.
- Publish an FAQ for utility relocation work on public improvement projects

Background information

Disturbance for setting utility poles

Disturbance Area	3' (hole)	6' (hole + shoulder)	15 Poles (19.6 each)
Sq. Ft. Disturbance	7.1	19.6	294
Percentage of 1 acre	0.00016	0.0005	0.0067

Trenching (assumes spoils are removed from site)

Trench Width (feet)	1.5	2	2.5	3
Sq. Ft. Disturbance / 100' Trench	150	200	250	300
Percentage of 1 acre	0.0034	0.0046	0.0057	0.0069

Excavation for placing a vault

Placement of Utility Vault (size)	6' x 6'	6' x 10'	8' x 12'
Excavation Area	36	60	96
Sq. Ft. Disturbance (1' larger all sides)	64	88	140
Percentage of 1 acre	0.0015	0.0020	0.0032