



**COMMONWEALTH of VIRGINIA**  
**DEPARTMENT OF CONSERVATION AND RECREATION**

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June 3, 2011

Mr. Roy T. Mills  
State Stormwater Program Administrator  
Virginia Department of Transportation  
1401 East Broad Street  
Richmond, Virginia 23219

**Subject: 2010 VDOT Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management**

Dear Mr. Mills:

In accordance with §10.1-564 of the Virginia Erosion and Sediment Control Law and §10.1-603.5 of the Virginia Stormwater Management Law, the Department of Conservation and Recreation (DCR) has completed the review of the 2010 VDOT Annual Standards and Specifications for Erosion & Sediment Control and Stormwater Management and they are conditionally approved. The conditional approval is based on DCR staff review and recommendations. The approval contains the following conditions:

1. All regulated land disturbing activities undertaken by VDOT shall comply with the minimum engineering, plan preparation and implementation guidance for post development stormwater management plans as specified in Instructional and Informational Memorandum IMM-LD-195.7. The method of achieving compliance with water quality requirements, utilizing the definition of "impervious area" found in this Memorandum is acceptable until December 31, 2012. This extended approval date allows for DCR and VDOT to conduct a cooperative effort to further evaluate best management practices to allow projects to meet the water quality and quantity requirements of the revised stormwater management regulations.
2. Section 5.4.4.2 of IMM-LD-195.7 shall be revised to reflect the following:  
The water quality volume for any required BMP shall be based on the total post development impervious area draining to the BMP. In areas where VDOT cannot prevent runoff from off-site impervious areas from entering the BMP, a variance may be sought for the design of the BMP.
3. The column entitled "Applicable Percent Impervious Cover of Site" of Table 1 in IMM-LD-195.7 should be revised to "Applicable Percent Impervious Cover of the Regulated Site".

4. VDOT will complete a literature review of the pollutant removal efficiency of grass shoulders and waterways associated with completed transportation projects and develop a draft report by September 1, 2011.
5. Section 5.4.7 of IMM-LD-195.7 change "Offsets" to "Offsite".
6. The text contained in Items 1, 2, and 3 at the top of Sheet 3 of IIM-LD-242.3 should be clarified in the next submission of the annual standards and specifications.
7. All VDOT land-disturbing activity requiring a stormwater management plan or General Permit for Discharges of Stormwater from Construction Activities will need to meet the requirements of the Virginia Stormwater Management Program (VSMP) Permit Regulations.
8. All regulated land disturbing activities undertaken by VDOT on private and publicly owned lands in Virginia must be conducted in accordance with the approved 2010 VDOT Annual Standard and Specifications. Individual project-specific erosion and sediment control and stormwater management plans must be prepared to ensure proper on site implementation of erosion and sediment control and stormwater management measures. However, these plans need not be submitted to DCR for approval as long as they comply with the approved 2010 VDOT Annual Standard and Specifications.

To ensure compliance with approved standards and specifications, the Virginia Erosion and Sediment Control Law, and the Stormwater Management Law, staff in DCR regional and central offices will conduct random site inspections, respond to complaints, and provide on site technical assistance with specific erosion and sediment control and stormwater management measures and plan implementation.

Thank you very much for your submission and continued efforts to conserve and protect Virginia's precious natural resources.

Sincerely,



Jeff Wilkinson  
Chief Deputy Director

cc: Doug Fritz, DCR  
John McCutcheon, DCR  
Stephen D. Kindy, VDOT

JW/jm