



COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

900 E. Main Street, 8th Floor, Pocahontas Building
Richmond, Virginia 23219-3558
Phone: (804) 225-3440 TOLL-FREE/TDD: 1-800-243-7229
FAX: 804-225-3447 WEBSITE: www.dcr.virginia.gov

March 22, 2012

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

Subject: 2012 Virginia Department of Transportation Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management

Dear Mr. Mills:

Thank you for your submittal of the Virginia Department of Transportation's (VDOT) Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management for 2012. We have reviewed the specifications and request that VDOT address the following comments prior to approval by the Department of Conservation and Recreation (DCR). We have attempted to list the comments in the order that they occur in the Specifications:

1. Section I Administration, A) Organization, Page 1: If possible, we recommend adding the hyperlinks to the Appendix column in the table. The Annual Specifications is lengthy document and is rather cumbersome to navigate. Being able to link to the Appendix section from the table where the content description is in the Title cell directly adjacent, would greatly improve the ease of use of the Specifications.
2. Section I Administration, B) Personnel, 2.b.on Page 2: Please revise "principle" to "principal" where it occurs in this paragraph.

3. IIM-LD-11.26, Sheet 3 of 19: Paragraph 1.3 notes that the VDOT ESC Program Manager is the State Hydraulics Engineer. Similar references occur on other sections of the Specifications. It is our understanding that the ESC Program Manager is no longer the State Hydraulics Engineer. Please revise here and elsewhere in the Specifications.
4. IIM-LD-11.26, Sheet 3 of 19, Paragraph 1.4.1: Revise "DCR ESC Program Manager" to DCR Training and Certification Program Manager. This role title was revised in the reorganization at DCR in the last year.
5. IIM-LD-11.26, Sheet 7 of 19, Paragraph 4.2: Remove reference to Tributary Strategy Plan. The Tributary Strategies have been superseded by the TMDLs.
6. IIM-LD-11.26, Sheet 8 of 19: Add Paragraph 4.9, saying: "VDOT shall be responsible for ensuring that all temporary ESC control measures are removed after all disturbed areas are permanently stabilized."
7. IIM-LD-11.26, Sheet 9 of 19, Paragraph 5.1: To the phrase "protective linings for ditches" add "and steep slopes".
8. IIM-LD-11.26, Sheet 9 of 19, Paragraph 5.1: The list of protective measures in this paragraph includes the term "silt trap" which does not appear to correspond to any DCR or VDOT Standard and Specification. Please clarify, revise or delete this term.
9. Standard & Spec. EC-7:
 - Revise note on Weir Section to read "Existing Ground or Top of Embankment".
 - Provide information to clarify the "Varies" notation on the side and embankment slopes.
 - Add note: "Sediment Traps to remain in place longer than 30 days shall be stabilized immediately."
10. Standard & Spec. EC-9: Add note: "Diversion Dikes to remain in place longer than 30 days shall be stabilized immediately."
11. We recommend that VDOT add a new Standard and Spec. that is equivalent to DCR's Standard & Spec. 3.10 Temporary Fill Diversion. This measure affords protection to fill slopes in situations where use of a Temporary Diversion Dike is impractical for any number of reasons.
12. IIM-LD 195.7, Sheet 6 of 25, Paragraph 4.8: Add note to beginning of first bulleted sentence: "Until July 1, 2012..."
13. IIM-LD 195.7, Sheet 6 of 25, Paragraph 4.9: Remove reference to Tributary Strategy Plan.

14. LD-445B – VSMP Construction Permit Fee Registration Form: Revise fee table at the bottom of the form to read thusly:

- \$200.00 for projects with a disturbed area of 2500 S.F. to 1 acre in a designated Chesapeake Bay Preservation Area location.
- \$300.00 for projects with a disturbed area of 1 acre to just under 5 acres.
- \$500.00 for projects with a disturbed area of 5 acres or greater.
- \$100.00 if project has already been reported and the disturbed area increases from less than 1 acre to 1 to just under 5 acres.
- \$200.00 if project has already been reported and the disturbed area increases from 1 to just under 5 acres to 5 acres and greater.
- \$300.00 if project has already been reported and the disturbed area increases from less than 1 acre to 5 acres and greater.

15. Appendix O: Add the approval letter from DCR for 2012.

Thank you for your patience as we have developed these comments. Please contact me if you would like to discuss these comments or related issues. We would be glad to arrange a meeting to go over the comments in person if desired. VDOT's Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management play a very important role in protecting the properties and natural resources of the Commonwealth. DCR looks forward to working with VDOT in the future to continue to make these Annual Specifications more useful to both of our departments.

Sincerely,



John R. McCutcheon
Training and Certification Program Manager
Division of Stormwater Management

cc: Ginny Snead – DCR
John Olenik - VDOT