Construction General Permit – Stormwater Deadline: 5/4/07 5pm

Construction Permit comments from Donette Dunaway, Stormwater Program staff, Region 3.

## From the Volume Calculator:

- Is the "Required Area for non-structural treatment (acres)", and "Required Volume for structural treatment (acre-ft)" (cells K10 and 11) supposed to match up with the Final area and volume cells K21 and K22? It seems logical, but should be stated in the permit and on the spreadsheet. Otherwise, it is hard to determine the logic of going through the Volume Calculator spreadsheet exercise.
- 2. I am confused about the units on the Non-structural site design measures, in cells L13 through L19. The links take the reader to separate excel pages that have yes/no questions, which will not yield a unit measurement of "Acres" as listed in L13. Further complicating the issue, tree planting and down spout disconnections and stream buffers are not measure in units of Acres, so it is unclear as to how one is to insert an acreage amount.
- 3. The disconnected downspout runoff questions and descriptions in the permit do not define "disconnected". It is not clear that the downspout should discharge to a permeable surface at the base of the spout, or that the water should run over permeable surfaces before encountering the closest impermeable surface. Additionally, it seems more reasonable to specify the size of area that the spout discharges to, rather than the 75 foot length, because the discharge path could be on three inches wide, which would form too small of a total area to gain much infiltration. Additionally, there is no mention of how permeable the surface must be, nor what the slope is or should be. Additionally, it would be logical to specify the receiving area as a percentage of the contributing roof area, rather than giving a specific size regardless of the contributing roof size.
- 4. Same comments on sizing as described above, should apply to the vegetated swale requirements.

