

VENTURA COUNTY TECHNICAL GUIDANCE MANUAL (TGM) 2015 ERRATA COMMENTS AND RESPONSE

	TGM Section	Comment	Response Approach
1	Page 1-7	<p>Following is suggested language to be added to TGM (page 1-7):</p> <p>“Land-disturbing activity that results in the creation or addition or replacement of impervious surface area on an already developed site, solely due to a governmental agency requirements (e.g., converting parking stall to meet ADA requirements, ADA path of travel or similar uses) will not be calculated as part of the 5,000 SF redevelopment limit and does not need to maintain the original grade and alignment, as long as the project is not a part of a bigger redevelopment project.”</p> <p>This adds relief for projects whose initial design did not meet the trigger, but only because of another requirement (ADA) required changes that exceeded the threshold. The rationale is since the original design did not meet the threshold, but triggered additional required improvements, those required improvements should not themselves trigger even more requirements, and therefore would not be included in the LID threshold trigger calculation. This would be applicable to only very rare cases.</p>	<ul style="list-style-type: none"> • The last sentence at the end of the Redevelopment Projects subsection on page 1-7 has been edited as follows: <ul style="list-style-type: none"> “Redevelopment also does not include the repaving of existing roads to maintain original line and grade.<u>or the repaving of roads and parking lots to meet ADA requirements, as long as the road or parking lot repavement is not part of a larger project that meets the redevelopment thresholds.</u>” <p>Note: This change will have a very narrow application. For instance, if a interior remodel changes uses and thus requires added parking, then if the new and or replaced impervious surface related to the parking exceeds 5,000 sf the project will have to comply with the TGM (because the change in use is voluntary, even if the additional parking is not). That would be different from a land owner being required to retrofit an existing parking lot to meet ADA without any improvement project related to the larger parcel.</p>
2	Page 1-7	<p>Routine maintenance that maintains original line and grade and alignment may create a change in depth of section (any change in base or sub-base) or type of pavement (ie asphalt to concrete), and should not be calculated as part of the 5,000 SF redevelopment limit. It is suggested that clarifying language be added to the following paragraph.</p> <p>TGM (page 1-7) reads as follow: "Redevelopment does not include routine maintenance activities that are conducted to maintain the original line and grade, hydraulic capacity, or original purpose of the facility or emergency redevelopment activity required to protect public health and safety. Impervious surface replacement, such as the reconstruction of parking lots and roadways, that does not disturb additional area and maintains the original grade and alignment, is considered a routine maintenance activity. Agencies' flood control, drainage, and wet utilities projects that maintain original line and grade or hydraulic capacity are considered routine maintenance. Redevelopment also does not include the repaving of existing roads to maintain original line and grade."</p>	<ul style="list-style-type: none"> • The following sentence was edited as indicated: <ul style="list-style-type: none"> “Impervious surface replacement, such as the reconstruction of parking lots and roadways, that does not disturb additional area and maintains the original grade and alignment, including altering the depth of section (e.g., a change in base or sub-base) or type of pavement (e.g. asphalt to concrete), is considered a routine maintenance activity.”:

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3	Page 1-7 and 1-8	<p>On page 1-7 in the first paragraph of the Redevelopment Projects subsection replace the number 10 with the number 9.</p> <p>Also identify the Single Family Residential exemption early in the Redevelopment Projects subsection. (e.g. redevelopment projects in category 10 above are exempt unless project creates . . .)</p>	<ul style="list-style-type: none"> The number 10 replaced with the number 9. The last sentence in the Redevelopment Projects subsection was moved to just after the bulleted item and before the word "Additionally:" and was edited as follows: Redevelopment projects in category 10 above (existing single-family dwelling and accessory structure projects) are exempt unless the project creates, adds, or replaces 10,000 square feet of impervious surface area.
4	Page 2-32	<p>Near the bottom of Page 60 of the MS4 permit under item (2)(C) the last sentence states "... pervious areas compared to the <u>pre-project</u> conditions."</p> <p>However the TGM on Page 2-32 near the top of the page under item 4) it says instead "... pervious areas compared to the <u>pre-developed</u> condition."</p> <p>There is a substantial difference between pre-project and pre-developed under the permit. The permit is less restrictive which should be reflected in TGM as well.</p>	<ul style="list-style-type: none"> The word "pre-development" has been replaced with the word "pre-project" in all three instances on page 2-32.
6	Page 6-7	Check all hyperlinks. They were not all working (i.e., ET-2 wasn't working); not sure if this is a consultant issue or when it's posted on website.	<ul style="list-style-type: none"> The ET-2 hyperlink in the outline does work. The hyperlinks in the outline of the newly revised TGM document have been checked.
7	Page 6-11	Table 6-1 - Under 'Design Criteria', second row it references 'Appendix D, Section D.2' but is not the correct reference.	<ul style="list-style-type: none"> This reference should be Appendix E, Section E-2. This typo has been corrected throughout Section 6.
8	Page 6-25 & 6-50	Note 3 on this Figure says "minimum 10' above seasonal high groundwater" which conflicts with Table 6-5 which says 5'. I think we settled on 5'. This same issue happens on Page 6-50.	<ul style="list-style-type: none"> Figure 6-3: the number 10 has been replaced with the number 5.
9	Page 6-33	Page 6-33 lists INF-3 Bioretention while appendix page G-24 lists INF-3 Proprietary Infiltration BMPs Checklist.	<ul style="list-style-type: none"> On page G-24, "INF-3 Proprietary Infiltration BMPs Checklist" has been replaced with "INF-3 Bioretention Checklist"
10	Page 6-61	INF-5: Permeable Pavement – The sixth bullet says 'Provide a written opinion by a professional civil engineer describing whether the infiltration trench will compromise slope stability;' but should be discussing permeable pavement not an infiltration trench.	<ul style="list-style-type: none"> "infiltration trench" has been replaced with "permeable pavement".
11	Page 6-143	The first paragraph states "and recalculate the design flow depth y using the Equation 6-18, where" and the reference should be to Equation 6-28.	<ul style="list-style-type: none"> Reference to "Equation 6-18" has been replaced with "Equation 6-28".
12	Page 6-146	In reviewing page 6-146 of the July 13 edition the first paragraph states "and recalculate the design flow depth y using the Equation 6-18, where", the reference should be to Equation 6-28.	<ul style="list-style-type: none"> Reference to "Equation 6-18" has been replaced with "Equation 6-28".

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16	Page E-11	In the definitions just below the equation E-8, Cimp should be C and the reference to equation (4) should be to equation (E-7)	<ul style="list-style-type: none"> • Correct, this change has been made.
17	Page E-21	Suggest adding an additional set of parentheses to both of the equations listed under step 3-7 to make them look like the equations as presented on page E-17 under item 3). As presented the equation is easily miss-calculated.	<ul style="list-style-type: none"> • Additional set of parentheses has been added around (T Pdesign/12).
18	Appendix E	In Appendix E on all BMP Sizing Worksheets, please include the BMP designation (i.e., INF-1/INF-2; INF-3, etc.) on all pages of the sizing worksheets. These sheets are required to be attached to the TGM Tool, but there are no identifying BMP designations when printed without the first few explanation pages from the TGM.	<ul style="list-style-type: none"> • BMP designation has been included in the header for the BMP Sizing Worksheets. • Additionally the following changes has been made to the sizing worksheet titles in Appendix E: • "E.5 VEG-1 Bioretention/VEG-2 Planter Box" should be "E.5 INF-3 Bioretention/BIO-2 Planter Box" • "E.6 VEG-3 Vegetated Swale" should be "E.6 BIO-3 Vegetated Swale" • "E.7 VEG-4 Filter Strip" should be "E.7 BIO-4 Vegetated Filter Strip"
19	Appendix G	Not sure how you want these reported, but one item that needs correcting is the Appendix G: Design Criteria Checklists device designations. The headings are not correct on all the checklists in Appendix G. INF-2 is listed as a Drywell Checklist, but INF-4 is the Drywell and INF-2 is an Infiltration Trench; INF-1 Infiltration Trench Checklist, should be Infiltration Basin Checklist, etc.	<ul style="list-style-type: none"> • The following changes has been made to the checklist titles in Appendix G and then reorganized in the order they appear in Section 6: • "BIO-1 Bioretention" should be "BIO-1 Bioretention with Underdrain" • "BIO-3 Proprietary Biotreatment Device" should be "BIO-5 Proprietary Biotreatment" • "BIO-4 Vegetated Swale" should be "BIO-3 Vegetated Swale" • "BIO-5 Vegetated Filter Strip" should be "BIO-4 Vegetated Filter Strip" • "BIO-6 Green Roof" should be "ET-1 Green Roof" • "FILT-1 Sand Filter" should be "TCM-4 Sand Filters" • "FILT-2 Cartridge Media Filter" should be "TCM-5 Cartridge Media Filter" • "INF-1 Infiltration Trench" should be "INF-2 Infiltration Trench" • "INF-2 Drywell" should be "INF-4 Drywell" • "INF-3 Proprietary Infiltration BMPs" should be "INF-6 Proprietary Infiltration" • "INF-4 Permeable Pavement" should be "INF-5 Permeable Pavement" • "GS-1 Hydrodynamic Separation Device" should be "PT-1 Hydrodynamic Separation Device" • "GS-2 Catch Basin Insert" should be "PT-2 Catch Basin Insert"
21	Appendix E	The bottom axis of figures E-2 (page E-7) and E-3 (page E-9) don't line up properly.	<ul style="list-style-type: none"> • The bottom axis has been modified to line up properly.
22	Appendix E & I	Stormwater BMP Maint. Plan Guidance & Checklists – Each page should have a header identifying which BMP that worksheet/checklist is for (INF-1, INF-2, etc.).	<ul style="list-style-type: none"> • BMP designation has been included in the header for Appendices E and I. see comment 18. • For Appendix I, page I-2, the numbering has also been fixed.

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