

**commentletters - Revised due to typo**

**From:** "George Chan" <george@gkceengineer.com>  
**To:** "commentletters" <commentletters@waterboards.ca.gov>  
**Date:** Saturday, May 31, 2008 4:34:48 PM  
**Subject:** Revised due to typo  
**CC:** "Rich Josenhans" <rjosenhans@westlandgroup.net>, "Brian Wolfe"  
<bwolfe@westlandgroup.net>, "Damien Deocales" <damien@gkceengineer.com>

Pls delete the previous email as I have some typo. My apologies.

As a practicing civil engineer who will have the responsibility of preparing PRD documents as required by this new permit, I have the following comments/questions:

1. Section H (1) (Page 20 of 27) should add two more provisions for exemption:
  - (a) If a site is designed to manage all its stormwater onsite (example: some desert communities in Southern California requires all site development be designed to contain the 100 Year frequency stormwater onsite using a combination of stormwater storage and infiltration and evapotranspiration).
  - (b) If a municipality has a regional facility such as a stormwater storage and spreading ground area prior to discharge to a downstream natural watercourse and a project site can demonstrate that such a regional facility exists to accepting its discharge.
2. Section H. 4 (Page 21 of 27): "ensure that post-project time of runoff concentration is equal or greater than pre-project time of concentration". I feel this requirement is not that easy to meet for sites between 2 and 7 acres as small sites have limited site design opportunities due to the large building footprint and limited pervious area available. The matching TC requirement should be more applicable to sites exceeding 7 acres.
3. Attachment F (also related to Section H): New and Re-development Performance Standard Spreadsheet:  
Cells B18 and B19 may have an error.  
Please check accuracy of formulas for Cells K1 thru' K14 as the cells do not seem to respond to an appropriate input.

Thank you for looking into this matter.

Sincerely,

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