



GROUP 3 MEMO RESPONSE TO COMMENTS

USWG – OCTOBER 15, 2019



BACKGROUND - HISTORY

- Group was recommended at June 2018 joint meeting between USWG and SHWG
- Charge and Membership approved by USWG in Fall 2018
- Group 3 met six times between November and August
- Full Group consensus on recommendations
- September USWG Presentation and Open Comment Period

Table 1. Membership for Group 3

Name	Affiliation
Drew Altland	RKK
Lisa Fraley-McNeal	Center for Watershed Protection
Joe Berg	Biohabitats
Rich Starr	Ecosystem Planning and Restoration
Josh Running	Stantec
Matt Meyers	Fairfax County, VA DPWES
Bill Brown	PADEP
Jeff White	MDE
Josh Burch	DOEE
Reid Cook	RES Consultants
Aaron Blair	EPA
Tess Thompson	Virginia Tech
Joe Sweeney	Water Science Institute

5 SETS OF COMMENTS RECEIVED

- WV DEP
- EPA
- Christopher Spaur (Wetland WG and SHWG member)
- Andrew Donaldson (SR Practitioner)
- DOEE

WV DEP COMMENTS

- 12 Comments Total
 - 4 of them were editorial (footnotes, minor wording changes for clarity), each of which will be addressed
- Grandfathering Clause: Request to align start date with Progress Year
 - Will shift start to July 1, 2021

WV DEP COMMENTS

- Clarifying Soil Lifts with varying types of toe protection
 - Clarifying footnote will be added that the type of toe protection will determine the category for soil lifts.
 - Replace the Photo in Figure 6 to better illustrate the point



WV DEP COMMENTS

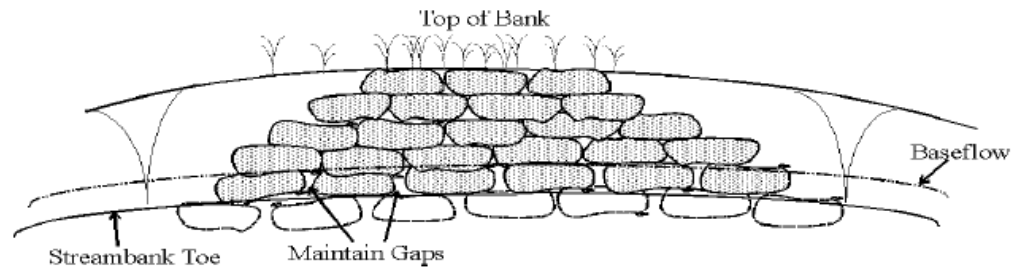


Figure B.4: Section View of Imbricated Rip-Rap

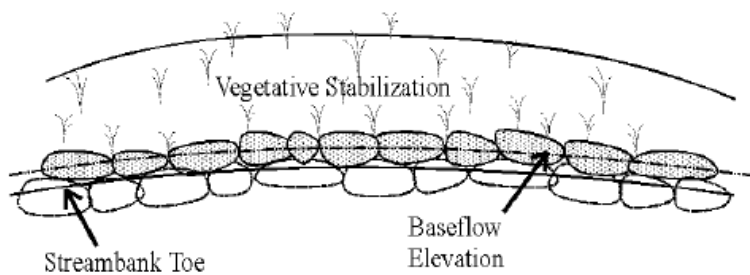


Figure B.5: Section View of Single Boulder Revetment

- 3 comments related to clarifying “riprap”
 - Use of “angular riprap” will be removed
 - Reference to “Urban Stream Restoration Practices: An Initial Assessment” (Brown 2000) will be added to provide clarity on the different design principles
 - Non-credible narrative definition will reference “techniques not consistent with comprehensive, long-term restoration”

WV DEP COMMENTS

- Recommended deleting section on default rates
 - WTWG decision
- Concern that BANCS calibration section would change the character of the BANCS Method
 - No change proposed to this section

EPA COMMENTS

- EPA recommends the final report demonstrate the habitat limitations that exist with the credible with limits armoring practices and explain the type of limited habitat that may be provided
- EPA recommends the differences in the between the non-credible and the credible with limits practices and the basis for the distinction be provided in the final report along with research on the functional and ecological pros and cons of these practices.
 - Final version will refer more explicitly to the design principles for these practices and the habitat created (Brown 2000)



EPA COMMENTS

- EPA recommends the final report include the scientific reasoning behind the 30% limit on creditable with limits
- Represents BPJ as described in the first bullet of Page 14

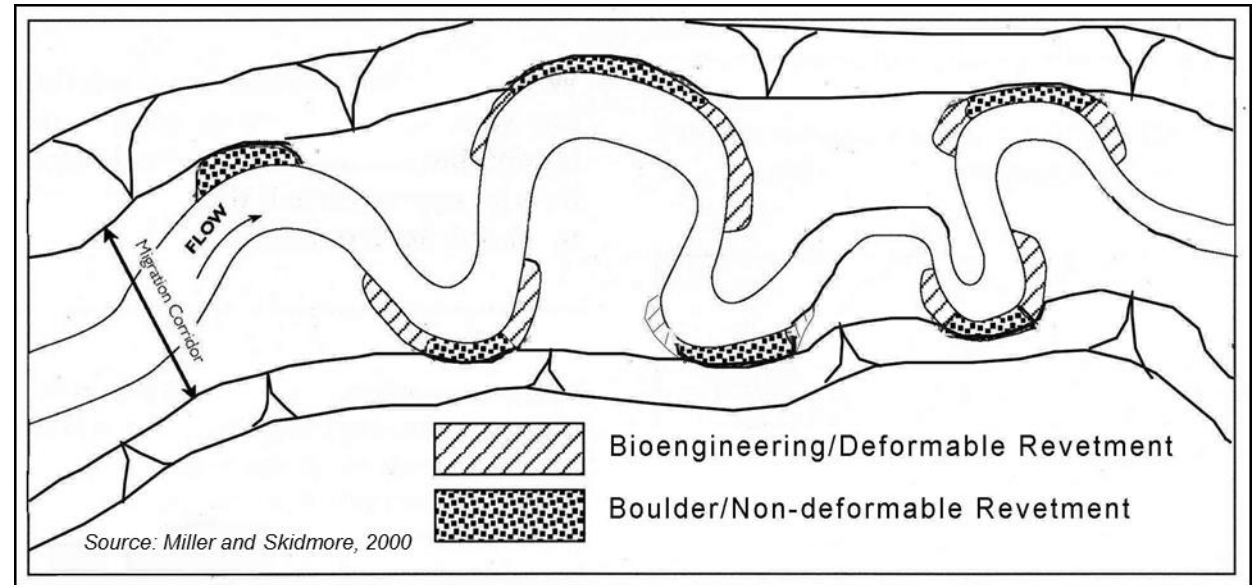


Figure 3: Appropriate use of deformable (soft) and non-deformable (hard) bank protection practices

Source: Miller and Skidmore, 2000

EPA COMMENTS

- It is unclear why projects considered to be “under contract” are allowed to be grandfathered in and not be required to use monitoring data to receive credit.
 - Project deliverables are agreed to under contract and more funding and/or time may be required to support additional monitoring. Site conditions for projects under construction may be too altered to be representative of pre-restoration conditions

EPA COMMENTS

- Two questions about relative impacts on sediment load and erosion rate calculations
 - There are no anticipated changes to the load reductions or erosion rate calculations as a result of this memo

CHRISTOPHER SPAUR COMMENTS

- Request to add mention of “lost” streams that were converted to concrete channels or piped in the Background section
- Request to add reference to how stream and floodplain geomorphic condition are influenced by vegetation type
 - Both comments will be addressed

ANDREW DONALDSON COMMENTS

- Concern that new guidance would reduce the number of eligible projects that are providing significant nutrient and sediment reductions
- Concern that bank stabilization represents sufficient functional improvement (lower-level functions) to meet qualifying criteria for SR practices
 - Group appreciates the comments but respectfully disagrees

DOEE COMMENTS

- Editorial or clarification
 - Upon initial review, all should be addressed in final draft



QUESTIONS?

