

Hey Chad,

I reviewed Renaud's EPSC plan and have a couple comments and questions:

- Section 1.5.1a: states that the filter curtain and silt fence will be installed when the temporary bridge is installed.
 - o Will the filter curtain stay in over the winter, or is it just for the installation until the temp is stabilized?
 - o A couple comments about the silt fence; (Bill could you confirm/comment here?)
 - The small sections that are tiered down the slopes adjacent to the abutments might work better as fiber rolls.
 - There is no disturbance when installing fiber rolls, unlike silt fence where there is exposed soils on both sides of the fence.
 - o This will limit disturbance during the winter period and will likely perform better during the spring because there will be no bare soil to erode.
 - They are easily traversed instead of a silt fence that is easily compromised when someone trips over them.
 - Fiber rolls trap sediment but do not trap water like silt fences which have the potential to pond water in big rain/thaw events that could then freeze when temperatures drop.
 - Fiber rolls also act as benches in steep slopes to slow the flow of water (although they must be installed along the contours to prevent concentration)
 - As we discussed in the PCC, the temporary bridge should be minimal disturbance and will then be stabilized with stone
 - o This means that there shouldn't be a significant amount of sediment in the runoff and therefore silt fence seems like not only overkill as the winter measure, but will likely cause more disturbance than it will prevent.
- Section 1.5.1c – New abutment Installation: states “Protect stream from concrete, Pump setup on each side”
 - o Are the pump setups for dewatering?
 - o Where will the pumps and filter bags go?
 - Instead of treatment, they could plan to haul the dirty water to the gravel pit for disposal if cleaner/more practical.
 - o They should probably have spill containment for the pumps because of the critical habitat.
 - strict adherence to Section 105.24 addressing pollution control is noted in the Title 19 Permit
- Section 1.5.1f – Final EPSC elements: states “Install drainage protection with stone and hay bales”
 - o Hay bales are not an approved BMP for check dams or inlet protection
 - o Type II inlet protection devices such as ‘Curlex Sediment logs’ can be substituted for the Type I stone inlet protection device
 - o I don't believe Type I Temporary Stone check dams can be substituted without approval, although it is another potential application for fiber rolls.
- Section 1.5.2 - OSA submittal would be required for the staging area at the garage if not already applied for.

- I believe they will also need to submit an exemption form for the gravel pit as well.

Please feel free to contact me with any questions or comments.

Thanks,

GPI | **John Nummy**
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