



February 3, 2021

South Carolina Department of Natural Resources
ATTN: Lorianne Riffin
Director, Office of Environmental Programs
1000 Assembly Street, PO Box 167
Columbia, SC 29202

RE: Comments for the Proposed South Carolina Stream Quantification Tool (SQT) (***Second Draft***)

Dear Ms. Riffin,

The South Carolina Mitigation Association ("SCMA" or "Association") considers our relationship with members of the Interagency Review Team ("IRT") as a key partnership to facilitate the development of mitigation within our great state. Per your email on January 22, you requested feedback on the second draft of the proposed South Carolina Stream Quantification Tool (SQT). SCMA's technical committee compiled feedback and is providing the following comments to foster an active and efficient mitigation market.

General Notes

- SCMA strongly encourages the steering committee to evaluate both the quantification and functional loss tools concurrently, in conjunction with other stakeholders (e.g., practitioners, SCDOT, etc.) and cautions against adoption of the quantification tool independent of the functional loss tool.
- The SQT incentivizes restoration activities and the restoration of additional stream length. Preservation and low-level enhancement provide functional and ecological lift but typically do not result in additional stream length. How will the IRT quantify stream preservation and enhancement credit via the proposed SQT?
- Please elaborate on how the SC IRT will apply or interpret the results of the catchment assessment for individual projects. Is the assessment intended to pre-qualify individual projects at the Prospectus stage?
- The NC DEQ hosts maps of the minor and major NPDES permitted facilities. This published data is comprehensive. Published data in South Carolina is less comprehensive, limited to wastewater

discharges and drinking water intakes. Please re-consider criteria that are carried over from North Carolina (e.g., NPDES Permits category in the catchment assessment, etc.).

- Please confirm that the land-use coefficient has been regionalized for South Carolina. How was this parameter regionalized for our state?
- How will the IRT apply the SQT or determine credit ratios for atypical or unique projects (e.g., preservation, urban projects)?
- Please consider regionalizing the concentrated flow points metric based on adjacent land-use and the location of the project within the state.
- SCMA is concerned that numerous variables have not been regionalized to our state and recommends limiting the published SQT to state-specific criteria.

SCMA appreciates the request for feedback and collaboration and your consideration of our comments. Our desire is to partner with all stakeholders (i.e., DNR, USACE, IRT, etc.) to improve the industry and quality of mitigation provided to offset unavoidable impacts. We consider this a part of a dialogue and we welcome the opportunity to meet with you in person or virtually to discuss these ideas and develop solutions. Please do not hesitate to contact us with questions or to schedule a time to speak or meet.