The following are comments from James Davis-Martin the DCR representative to the WQGIT (received 3/29/2013), with responses from Matt Johnston inserted in blue text.

The panel's tiered protocols for Stream restoration is a good concept, however the proposal to require site specific measures to calculate sediment and nutrient reduction credits is not workable. Even recognizing the high degree of variability among implementation sites, there is no justification for using site specific details in a lumped parameter model. The panel should create default reduction rates for each protocol. This would allow some credit for projects where all of the site specific measures are not reported. Only the feet of restoration and protocols addressed would be needed to get the default level of credit. Additionally, the panel should include an approval of the existing interim reduction rates, or similar, for a generic stream restoration. This will be important to allowing continued credit for the stream restoration already reported in the implementation progress record as well as when the specifics of the protocols used or site specific measures for a project are not documented. Ideally, the default rates should be set at levels that encourage more detailed reporting. So the generic stream restoration rate is less than the protocol specific default rates which are less than reductions what would be calculated using the panels proposed approach. More detailed reporting gets more credit. But some credit is given for reporting the most basic data. The default values will also be critical in milestone planning to forecast the affect of anticipated implementation where the site specific parameters are not yet known.

> Matt Johnston response: The WTWG needs to determine what the default rate will be for new stream restoration projects. Existing stream restoration projects will continue to get the existing credit as they always have. My recommendation to the group will be to assign new "non-conforming" projects the existing credit as a default rate.
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> The site-specific aspect of the protocols is a fundamental recommendation of the panelists just as it was a fundamental recommendation of the stormwater and retrofit panels.

I have concerns about the proposed approach to apply stream restoration credits in bulk at the river segment scale. I do not understand how this will translate into the TMDL world of LAs and WLAs, or properly credit localities implementing stream restoration projects. There needs to be some way to assign the stream restoration credits back to the sources at the LRSeg scale. Since the model currently spreads the loads generated in-stream across the landuses that exist in the contributing watershed, I recommend the stream restoration credit be similarly divided.

> Johnston response: This is exactly how stream restoration is currently modeled. A state reports land uses treated, feet of restoration and receives a bulk pound reduction from the loads generated from the land uses in question. The same thing can be done for these new protocols. We just want to make sure that states report the land uses treated for all three protocols.

Finally, the report says that this practice is "for stream reaches not simulated in the Chesapeake Bay Watershed Model (CBWM), which include reaches with mean annual stream flow less than 100 cubic feet per second (cfs) that do not have a calibration station and are roughly the size of 11-digit HUCs". We need to make sure there is a mechanism for credit in areas where the steam flow is greater than 100 cfs or where there is a calibration station?

> Johnston response: Stream restoration can be applied in any land river segment and receive bulk reductions in the manner described above. Stream restoration on very large rivers, such the tidal Potomac, are more appropriately reported as shoreline erosion control. Shoreline erosion control is currently being considered by another expert panel.