



October 26, 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 South Carolina Stream Quantification Tool (SQT) Debit Tool Calculator and Manual

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 state. Per your email on October 12, you requested feedback on the South Carolina Stream Quantification Tool (SQT) Debit Tool Calculator and Manual. SCMA's technical committee provides the following comments to foster an active and efficient mitigation market.

**General Notes:**

- SCMA suggests that the SQT and related products are challenging to evaluate without a holistic understanding of how federal and state agencies will implement these tools in South Carolina. We encourage the steering committee to engage all stakeholders (e.g., DOT, mitigation providers, etc.) during the development and deployment of these tools.
- SCMA recommends that the adopted debit tool present the required mitigation in both functional feet (SQT) and in terms of the 2010 Standard Operating Procedure (SOP). This approach will facilitate adoption and the transition from the 2010 to a new SOP. This transition from old to new should not discount or disadvantage existing (grandfathered) or future mitigation banks.
- How will stream preservation generate credits, and how much credit will preservation activities generate in conjunction with the SQT? Changes to the method for defining and quantifying the value of stream preservation may significantly impact siting future mitigation projects in our state.

***South Carolina Stream Quantification Tool (SQT) Debit Tool Calculator and Manual Notes:***

- Please reference a definition of perennial, intermittent, and ephemeral. (Page 3 of Manual)
- Please enclose the proposed condition evidence (via assessment) with the manual to justify the impact severity tiers. Rather than a model of percent of functional loss, please consider providing existing function examples of each impact tier. (Section 2.5 and 2.5.1)
- Large linear projects commonly include many independent stream impacts. The tool computes the cumulative impact and currently limits the number of impact sites to ten sites. This approach and the requirement for multiple worksheets may lead to cumulative impact miscalculations. (Section 3.2)
- Before regulators adopt the SQT and related products, SCMA would like the opportunity to review and provide feedback on the proposed Biological metrics. (Section 3.3, Biology)
- SCMA would like to help develop and review practical examples for Chapter 4.

SCMA appreciates the request for feedback and collaboration and your consideration of our comments. We desire to partner with all stakeholders to improve the industry and quality of mitigation generated in our state. 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.