PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
Thank You' s should be limited to the organizations and agencies who participated in this revision such as, State Representatives, Overview Council, EPD, GDOT, GA DNR, GSWCC etc…but we would request that no individual names from the *previous* Technical Editors or Technical Committee should be identified by name, in any of that section, The 5th edition has listed thank you's without naming names as well as an example	Revised acknowledgement paragraph	v	
In the preface of your draft, you failed to recognize State Representative Mr. David Knight and Mr. Larry Booth of Win-Fab Fabrics. They both should be recognized for their contributions in setting the State of Georgia's Water Quality Program Back about 20 years. You may also want to consider that many of the people recognized as having contributing to this piece of work, may not consider this undercut revision being worthy of their name being tied to it.	Revised acknowledgement paragraph	v	
Clarify "eight hour": 3. Level IB Advanced Fundamentals Seminar, an *eight hour* class for regulatory inspectors and non-regulatory personnel contracted to conduct regulatory work.	Corrected to 16 hr class	1-3	
1- Under sediment barrier (definition) section it lists different types of sediment barriers allowed: Am i correct in my thinking that mulch socks are allowed ? being as mulch berms are allowed , they are the same material correct ?	Added mulch berms and compost socks to types of sediment barriers	2-9	
In Chapter 2 page 2-11 in the last paragraph or another more appropriate section of the manual GDOT recommends adding the following statement: **As a matter of roadside safety, temporary riprap check dams should be limited to new location construction, outfall locations, or to roadways where adjacent staged traffic is sufficiently clear of the riprap check dams.** We are pleased to submit for your review the Department's third Annual Report. This submission is the fulfillment of the requirement specified in section 5.1 on page 29 of our MS4 permit, GAR041000. Also submitted are our revised Illicit Discharge Detection and Elimination Plan and our revised Inspection and Maintenance Manual.	No action		

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
At its October 6, 2015 meeting, the Board voted to send correspondence to you regarding the Manual to be revised and reissued later this year. Specifically, the Board requests that revisions be made to the definition of "Design Professional" similar to that which was added to the NPDES rule at last reissue. At the time of the last reissue, the Board requested a revision of the definition of "design professional" in order to be comply with the language of O.C.G.A. § 12-7-4(b) and the Georgia law governing professional licensure. Code Section 12-7-4(b) provides that a "design professional" who designs soil erosion and sedimentation plans and other similar pla ns should demonstrate competence through qualifications, education, experience, and licensing as required for said practice in this State by applicable provisions of Title 43. Code Section 12-7-4(b) does not authorize an unlicensed person to perform activities that require licensure under Georgia law. Accordingly, the Board encourages the use of the following language that was added to the NPDES rule at the last reissue: "Design Professionals shall practice in a manner that complies with applicable Georgia law governing professional licensure." This language will be helpful in appropriately protecting the public and in minimizing any confusion should questions about unlicensed practice arise in the future. Your cooperation is appreciated.	Inserted the following language: Design Professionals shall practice in a manner that complies with applicable Georgia law governing professional licensure.	3-4	
I would recommend that the Sand Fence spec be opened up to the commonly used Sand fence products that are currently on the market. The Copper requirement and the Slat spacing are not commonly seen for this product…Also the stain is more common for snow fence than sand fence.	Revised language to indicate advisory condition	6-24 to 6-25	See p. 6-1 for use of shall or will, should, and may
Aspen Excelsior Blocks have been used for streambank protection (Sb, page 6-59) and as Sediment Barriers (Sd1, page 6-136). Information can be found at http://americanexcelsior.com/product/?sub=11 or we can answer any other specific questions if they are any.	No action		Applicants must follow Equivalent BMP List procedures to obtain approval for use

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
RECPs (starting on page 6-69) a. Short-Term i. Photodegradable Aspen excelsior blankets are excluded from all RECP sections. They are proven solutions to control erosion, hasten revegetation, and protect water resources that should be an option. They have been used successfully on private and public projects across the country including in Georgia. In addition, they have been approved and used by GADOT for decades. Sections of the GSWCC Manual (2016 edition) have been edited to include the appropriate information for their inclusion and to update items that are inconsistent with industry standards. Please change it to read: "Straw or aspen excelsior blankets with a top and bottom side photo degradable net. The maximum size of the mesh shall be openings of ½" x ½" for straw and 1" x 2" for aspen excelsior. The blanket shall be sewn together with ≤2.0" centers for straw and ≤4.0" centers for aspen excelsior with degradable thread. Minimum density should be 0.5 lbs per square yard." Note: Thickness requirements are not necessary for degradable products. Based on a study by the University of Minnesota larger opening sizes on netting are more environmentally friendly.	Revised language to indicate advisory condition	6-69 to 6-70	See p. 6-1 for use of shall or will, should, and may
RECPs (starting on page 6-69) a. Short-Term ii. Biodegradable Please change it to read: "Straw or aspen excelsior blankets with a top and bottom side biodegradable jute net. The top side net shall consist of machine direction strands that are twisted together and then interwoven with cross direction strands (leno weave). The bottom net may be leno weave or otherwise to meet requirements. The approximate size of the mesh shall be opening of 0.5" x 1.0". The blanket shall be sewn together with ≤2.0" centers for straw and ≤4.0" centers for aspen excelsior with degradable thread. Minimum density should be 0.5 lbs per square yard."	Revised language to indicate advisory condition	6-69 to 6-70	See p. 6-1 for use of shall or will, should, and may

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
RECPs (starting on page 6-69) b. Extended Term (functional longevity 24 mo.) i. Photodegradable "Blankets that consist of 70% straw and 30% coconut or aspen excelsior with a top and bottom side photodegradable net. The top net of the straw/coconut blanket should have ultraviolet additives to delay breakdown. The maximum size of the mesh shall be openings of 0.75" x 0.75" for straw/coconut and 1" x 2" for aspen excelsior. The blanket shall be sewn together with ≤2.0" centers for straw/coconut and ≤4.0" centers for aspen excelsior with degradable thread. Minimum density should be 0.5 lbs per square yard." Note: Net size of .75" x .75" has been used by multiple manufacturers for years and the minor size opening difference does not affect performance based on large-scale testing and decades of field installations. Larger opening sizes are more environmentally friendly, if anything. Industry standard for straw/coconut is .5 lbs per square yard.	Revised language to indicate advisory condition	6-69 to 6-70	See p. 6-1 for use of shall or will, should, and may
RECPs (starting on page 6-69) b. Extended Term (functional longevity 24 mo.) ii. Biodegradable "Blankets that consist of 70% straw and 30% coconut or aspen excelsior with a top and bottom side biodegradable jute net. The top side net shall consist of machine direction strands that are twisted together and then interwoven with cross direction strands (leno weave). The bottom net may be leno weave or otherwise to meet requirements. The approximate size of the mesh shall be opening of 0.5" x 1.0". The blanket shall be sewn together with ≤2.0" centers for straw/coconut and ≤4.0" centers for aspen excelsior with degradable thread. Minimum density should be 0.5 lbs per square yard."	Revised language to indicate advisory condition	6-69 to 6-70	See p. 6-1 for use of shall or will, should, and may

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
RECPs (starting on page 6-69) C. Long-Term (functional longevity 36 mo.) i. Photodegradable "Blankets that consist of 100% coconut or aspen excelsior with a top and bottom side photodegradable net. Each net should have ultraviolet additives to delay breakdown. The maximum size of the mesh shall be openings of 0.75" x 0.75" for coconut and 1" x 2" for aspen excelsior. The blanket shall be sewn together with ≤2.0" centers for coconut and ≤4.0" centers for aspen excelsior with degradable thread. Minimum density should be 0.5 lbs per square yard." Note: Net size of .75" x .75" has been used by multiple manufacturers for years and the minor size opening difference does not affect performance based on large-scale testing and decades of field installations. Larger opening sizes are more environmentally friendly, if anything.	Revised language to indicate advisory condition	6-69 to 6-70	See p. 6-1 for use of shall or will, should, and may
RECPs (starting on page 6-69) C. Long-Term (functional longevity 36 mo.) ii. Biodegradable "Blankets that consist of 100% coconut or aspen excelsior with a top and bottom side biodegradable jute net. The top side net shall consist of machine direction strands that are twisted together and then interwoven with cross direction strands (leno weave). The bottom net may be leno weave or otherwise to meet requirements. The approximate size of the mesh shall be opening of 0.5" x 1.0". The blanket shall be sewn together with ≤2.0" centers for coconut and ≤4.0" centers for aspen excelsior with degradable thread. Minimum density should be 0.5 lbs per square yard."	Revised language to indicate advisory condition	6-69 to 6-70	See p. 6-1 for use of shall or will, should, and may

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
Check Dams Page 6-79 Aspen excelsior logs have been used to filter water and dissipate velocity in swales and ditches for years. Aspen excelsior fibers also filter hydrocarbons from contaminated stormwater. Hydrocarbons are typical components of oils, greases, etc. that runoff of roads into ditches. Here is a section on aspen excelsior logs that could be added so they are not excluded as a successful option to protect the environment: **Aspen Excelsior Filter Log (FL)** A. Description. Aspen Excelsior Filter Log (FL) shall consist of either 100% engineered aspen wood excelsior with 80% of the fiber ≥ 6 inches in length inside a durable, flexible tubular degradable netting with knotted ends. FL shall be designed to provide intimate contact with the soil, which prevents blowouts and undermining. FL shall allow water to flow through the porous matrix, minimizing overtopping, slowing high flow water velocities, and filtering and stopping soil movement. FL shall be seed free and conform to the performance requirements in Table 1, and conform to the material requirements in Tables 2. B. Applications. Around site perimeters to intercept sheet flow, retain sediment on site, and filter runoff while allowing site to dewater during hydraulic events. Across ditch bottoms to filter contaminated stormwater runoff, reduce flow velocity, and retain sediment. Across slopes to minimize the effects of sheet flow runoff by filtering the runoff, reducing runoff velocity, and retaining sediment on the slope. Around inlets to filter contaminated stormwater runoff and prevent sediments from entering inlet	Revised language to indicate advisory condition	6-79	See p. 6-1 for use of shall or will, should, and may
The drawing diagrams for silt fence check dams are not included in this revised manual and we believe they should be.	No action		GDOT is currently following the NPDES Process for alternative BMP with respect to this practice.
2- Can a 12" (mulch sock) be used as check dams ? Readily available , inexpensive, all natural , Etc .	No action		GSWCC has not approved the use of a 12" mulch sock.

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
Check dams In 5th edition – no overflow criteria on ditch check dams was listed. In 6th edition revision – overflow criteria is listed. Based on a letter GDOT published on July 2015, they are waiting on GSWCC to put out more information regarding the Check Dams in the new addition and we would like to contribute to that conversation during the public comment period. Comment: If check dams using socks, filled with mulch or compost either one, that are 12” tall are allowed as a BMP, with no reinforcements’ such as TRM’s as a splash pad or weirs cut into the fabric, in this GSWCC manual, it would only stand to reason that the 12” height is the main criteria that no reinforcements’ are mandated. It should also be noted that many of the 12” socks, when installed, settle to a 9” height.	No action		Overflow criteria is not associated with check dams. GSWCC has not approved the use of a 12" mulch sock.
The detail for baled straw check dams (Cd-Hb) appears to be difficult to install in typical GDOT ditches. GDOT ditches are typically 4-foot flat bottoms with 4:1 fore-slopes and 2:1 back-slopes. Baled straw check dams would be installed to meet field conditions. The sediment storage height of baled straw check dam appears to be approximately 12-inches (assuming a baled straw 14"x18"x36" for a two stringer). A fully buried bale straw is shown completely entrenched on the downstream side of the check dam to serve as a splash pad. GDOT recommends that other options such as turf reinforcement matting that can also function as a splash pad. GDOT has been in coordination with EPD over the use of a modified fabric check dam as well. Engineering details were drafted, submitted, and accepted by EPD. These check dams were installed in the field in three locations and subjected to several periods of intense rainfall. A memorandum of agreement exists between EPD and GDOT that allows GDOT to continue use of this modified fabric check dam. GDOT is requesting that the modified check dam be included in the 2016 edition of the "Manual for Erosion and Sediment Control in Georgia".	No action		GDOT is currently following the NPDES Process for alternative BMP with respect to this practice.

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
Errors in this edition, 3 times, referring to AASHTO M288-96 section 7.3 Separation /Stabilization Requirements. The Section 7.3 written below doesn't refer to the same topic. Section 8 Tables should be referenced instead. AASHTO M288-06 section 7.3 During storage, geotextile rolls shall be elevated off the ground and adequately covered to protect them from the following: site construction damage, precipitation, extended ultraviolet radiation including sunlight, chemicals that are strong acids or strong bases, flames including welding sparks, temperatures in excess of 71oC (160oF), and any other environmental condition that may damage the physical property values of the geotextile.	Corrected to M288-06; kept reference to section 7.3	6-79, 6-88, 6 - 91	Table 8 refers to pavement fabrics.
3- As the gentleman stated at public comment meeting , the wood mulch would stay in the recommended sock better , along with other positives concerning the use of wood mulch. which is readily available.	No action		
4- Were compost filter socks approved for use as check dams in the 5th edition? If not what test method or bench test or field tests were performed for this NEW use as check dams in the proposed 2016 manual ?	No action		Compost filter socks were approved as a straw bale check dam.

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
I would like to comment regarding compost filter sock and the importance of maintain your current specification for the compost filter media and mesh opening size. It is imperative to understand the importance in how the specification of each of these items assures performance standards expected of a compost filter sock. A request was brought up in this week's public meeting regarding the elimination of the opening size specification of compost filter sock mesh and changing of the filter media spec. I would like to elaborate on why making any changes would not be conducive to your efforts to have quality products in the state of Georgia. The particle size for compost filter media specified in your current draft is the accurate media specification that allows for optimum flow thru and filtration of sediment particles and suspended solids. The mesh open size currently specified in the draft (1/8" – 3/8") allows for sediment laden water to enter the filter media efficiently. Smaller opening sizes in the mesh would allow for blinding as sediment laden particles block the smaller opening sizes of the mesh – rendering the device useless. Compost filter socks ARE a 3-dimensional filter and appropriate opening size in the mesh material is critical for optimum performance of the correctly specified filter media. There has been countless published research over the last 15 years on compost filter socks by many credible institutions including, but not limited to – EPA, USDA, University of Georgia, Ohio State University, San Diego State University, Texas A&M University, Virginia Tech University, etc. All of the research conducted at these institutes to test performance and develop specifications for compost filter socks utilizes the same mesh and media specifications that you have listed in your current 6th addition draft. Deviating from your current specification would create ineffectiveness in the compost sock application and be detrimental to performance. There is currently NO research that I am aware of that has tested any other mesh opening size or altered media specification to support any other findings	No action		

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
[Comment from Row 24 continued] In addition to research, it is important to look at other state and federal agency specifications for compost filter socks. All bordering states to Georgia utilize the same mesh opening size and filter media specifications. In addition to the surrounding states of Georgia, ALL other state agencies in the US with compost filter socks specifications, currently 40 states, have the same specifications in their manuals. From a federal agency standpoint, the EPA, USDA, Army Corp of Engineers and AASHTO have adopted these mesh opening and compost filter media specifications as well. I would urge the council to carry on with your current compost filter sock specifications in regards to mesh opening size (1/8”-3/8”) and compost filter media. Deviating from these specifications would be contradictory of all other federal and state specifications on the compost filter sock application. By removing the mesh specification it would allow any material to be used in the application – Imagine eliminating the silt fence fabric specification – you could then have silt fences in the state made of any material – rubber silt fences, sod silt fences, carpet silt fences! By removing the compost filter media specifications you may open the door to folks putting animal waste in socks, or even possibly human waste!!	No action		
The manual does not state a maximum drainage area for the use of compost filter sock check dams (Cd- Fs). We recommend the manual state a maximum drainage area for using compost filter sock check dams for consistency in information provided similar to stone and baled straw check dams. An installation detail should also be provided.	Added compost filter sock to straw bale under "Drainage Area"	6-79	Drainage area is the same as for hay bale check dam.
Question: Is there more than one manufacturer that meets the compost filter sock specifications on page 6-80?	No action		
Section E. *Reads as: Sock containment system for compost filter media shall be a photodegradable or biodegradable knitted mesh material with 1/8 to 3/8 inch openings*. **The reason why manufacturers believe that this sentence should be removed, is that the media can/will fall out of the product during handling or installation; it can also be inhibiting the effectiveness of the product because the 3 dimensional aspect is lost; this can also stifle future innovation by requiring a specific design construction and it could present an issue with certain patented product designs limiting other manufacturers from participating.**	Revised language to indicate advisory condition for the opening size	6-80, -137	See p. 6-1 for use of shall or will, should, and may
Channel lining is velocity-driven in the 2016 edition when it should be driven by maximum shear stress and permissible shear stress	No action		Velocity addresses shear stress concerns.

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
Channels – Page 6-85 Category 1 This section refers back to Slope Stabilization where it says "Short-Term RECPs as a minimum shall be used to stabilize concentrated flow areas with a velocity less than 5 ft/sec on slopes 3:1 or greater with a height of 10 feet or greater." Comment: The statement above will result in the cheapest (and typically lowest performing) product to be used almost every time. When would extended term and long term blankets be specified, if the documents says short-term products can be used? There needs to be some distinction of when each product type is used otherwise the cheapest product will be used almost every time, which could lead to failures and threaten the water resources. There are different RECP options out there because not every site requires the same level of protection. Some sites are more sensitive than others, soils may be different, etc. One needs to use the right product for the right application, but as written that likely will not happen. Category 2 lumps all Turf Reinforcement Mats into one group. This is disturbing too because you will end up with the same "race to the bottom" with the cheapest product being used each time. TRMs are developed at varying performance capabilities. By having only one category the cheapest (and likely the lowest performing) TRM will be used each time. Here are categories to consider from the Erosion Control Technology Council (ECTC): http://www.ectc.org/assets/docs/ectc_apr08_ectcspecificationfinal.pdf	No action		
Errors in this edition twice a reference to AASHTO M288-98 were found.This edition does not exist / the most recent edition is AASHTO M288-06.	Corrected to M288-06; kept reference to section 7.3	6-88, 6-91	
Errors in this edition, twice, referring to AASHTO M288 section 7.4 (pgs 6-88 & 6-91). This section does not exist.	Corrected to refer to Section 8	6-88, 6-91	
Errors in this edition, 6 times, referring to AASHTO M288-96 section 7.5. This section does not exist.	Corrected to refer to Section 8	6-95, 6-110, 6-112, 6-122, 6-207, 6-228	

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
The Diversion (Di) detail has “with” where I believe “width” should be labeled.	Corrected spelling	6-101, Fig. 6-17.2	
There is also a duplicate dimension for “depth of flow” on the triangular channel.	Deleted duplicate dimension	6-101, Fig. 6-17.2	
GDOT currently uses "stone filter berms" that consist ofType-3 rip-rap faced with #57 stone like rock filter dams (Rd). Stone filter berms have a minimum height of 2 feet and a top width 2 feet instead of 6 feet like rock filter dams. Stone filter berms are used along the perimeter where typical perimeter silt fencing may be inadequate. The stone filter berm is used in an attempt to store sediment and filter runoff from sheet flow areas or shallow concentrated flow without well-defined channels. Rock outlet temporary sediment traps (Sd4-C) function similarly to GDOT's stone filter berm, but they appear to require a compacted earthen embankment to assist in storage. A rock outlet temporary sediment trap may or may not be appropriate in all applications GDOT uses stone filter berms.	No action		
Related to testing, we have observed in the field, many slight variations to the Manual requirements, that have proven to make the BMP more effective. One example being the slight inclination of sediment barrier (Silt fence) posts upslope, rather than requiring them to be strictly vertical. Soil engineers who understand horizontal earth pressures, often lean the posts upgrade to reduce these pressures. As a result, fewer stakes are sheared off at the bottom, releasing all of the backfilled sediment. I am also concerned about products that have the posts attached to the fabric at the required interval. Too often a rock or other impediment prevents the proper installation of the post. Third, it is critical that the alignment of the sediment barrier be “on the contour”. Any deviation creates a low spot where most of the sediment will accumulate, and leaving a lot of the sediment barrier unused. Many of these ‘field experiences’ could be shared among contractors if the Commission had a mechanism of information/technology transfer at the field level.	No action		
Last sentence should be removed or clarified, because it is saying that the height of the barrier *cannot not exceed 1’* and that the *support spacing does not exceed 4’*. In this situation, you are looking at a row of silt fence which is typically 36” in height & it is typically reinforced with another row of silt fence 36”. If we understand this correctly, it is saying that the 2nd row cannot exceed 12” in height. The only 2 products listed as sediment barriers that would require staking, are the silt fence (staked 4’ for sensitive projects and 6’ for non sensitive projects) and compost filter logs (which are only staked 6’ apart in their approved Non Sensitive Applications)	No action		Language is advisory. See p. 6-1 for use of shall or will, should, and may.

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
5- As i stated at public comment : After the recent DOT study for silt fence check dams it appears there are concerns about scowering with (36")silt fence being used a check dams , and as i here splash pads may be required. Which would increase installation times & increase the price considerably . Please give consideration to the use of a 18" piece of sensitive fabric(type C)with approved backing with 4' spacing approved wooden posts is used after trenching it would be 1' high ? This should eliminate the majority of runoff going around ends due to the fact the product is 18" shorter . This would basically serve as the weir . This would also reduce installation times & reduce current costs considerably . I believe the compost filter sock is required to be 12" & hay bales are approx 12" high after installation when used as a check dam. Apparently 12" height is the magic number to eliminate scowering ? If not, then (all check dam products should be required to install a splash pad) .Being as a splash pad would be a new & separate & expensive solution to this process .	No action		There is no 12" sock product that has been approved; there is an 18" sock product that has been approved to be used like a straw bale check dam.
6- sensitive style silt fence --- please give consideration to installing a photo of the GDOT C system with specs be placed in the green book as an equivalent approved alternative to the traditional type C wire back style . the C system has been in use for over 7 yrs and is widely used throughout Ga. and not onlyGDOT projects. This would help eliminate a lot of confusion within the design community. Nearly every category in the proposed manual has a photo of the equivalent available for said category. I feel the same process (photo)needs to be applied to all categories that offer an equivalent	No action		
Type A Silt Fence: This 36 inch wide filter barrier shall be used on developments where the life of the project is ***greater than*** or equal to six months**. We think that this should be equal to or less than 6 months. (Greater than could mean 5 years for example).**	No action		Wording is the same as the Fifth Edition.
Type C Silt Fence: Georgia DOT Type C System is missing from this category & needs to be added. (It does refer to the alternative backing on the drawing on page 6-141, but it needs to be under this heading as well on page 6-137 so engineers & contractors will not be confused thinking it isn't approved when it is .)	No action		
Filter Media Sock Specifications: Bold sentence in the middle says **Filter Media Sock is classified as a type B, non-sensitive application. On the drawing page on 6-142, it shows stake spacing for this product in Sensitive applications as well & that should be deleted.**	Corrected to read that Type B is non- sensitive	6-137	

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
Filter Media Sock Specifications The sentence reads: Non-Composted products will not be accepted. Refer back to page 6-136 under definition, mulch berms are allowed. (see the picture below). Therefore, this sentence above requires any media to be compost which eliminates other proven products from participating. Many states currently use wood mulch as a successful media in socks and the 6th Edition revision itself allows for wood mulch to be distributed as a sediment barrier, but by inserting the statement on page 6-137 above, if the product goes into a sock, it is not allowed, because it is not composted. The Solutions: 1. This section should be revised to say that “if compost media is used” it should follow the CFR503 regulations. 2. Delete the sentence, Non Composted products will not be accepted. 3. Under the Filter Media Sock Specifications heading, the first sentence needs to read: IF composted filter media is used for sediment barrier filler material it shall be weed free and derived from a well decomposed source of organic matter. 4. This section should also say that wood mulch is an acceptable media for filter socks and refer to the drawing on page 6-142 for installation. 5. On the drawing on page 6-142 The heading: Type B Compost Filter Sock should be changed to FILTER MEDIA SOCK instead as per the heading of this section. 6. Section E. on page 6-137 should be removed because it inhibits the effectiveness of the product and the media will fall out of the product. No requirement on opening sizes should be listed.	No action		Refer to Equivalent BMP List Procedure to obtain approval for specific products.
[Commenter] raised his concern about a specification under “Filter Media Sock” that states, “Non-composted products will not be accepted.” He said that this statement would eliminate the use of wood mulch in the sock, even though wood mulch is a useful product. Mr. Siebold commented that he has yet to see a study that justifies the requirement for compost, where the idea is that the compost helps to break down pathogens in the sediment. He also commented about the size requirements for the sock material, noting that a larger hole size takes away from the three-dimensional properties of the practice.	Amended language after "non-composted products will not be accepted" by adding … without applicable water quality test results	6-137	

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
Issue: Sensitive Application Silt fence is designed for high water flow and can also be manufactured to meet this 12" height requirement with 4' spacing of stakes and it is not mentioned in the book as an approved practice. Sensitive Application Silt Fence will also not settle to a lower height as the socks would, because of its design. We would like to see this option offered side by side as another BMP option along with the compost or mulch socks.	No action		There is no 12" sock product that has been approved; there is an 18" sock product that has been approved to be used like a straw bale check dam.
8-- Under type C silt fence pg 6-137 i would ask for your consideration on changing this wording from "with wire reinforcement " to "approved backing" .	No action		See figure 6-27.2
The silt fence check dam is missing and that a compost filter sock is allowed for the Check Dam practice without a size. The typical size is 12- inches.	No action		GSWCC has not approved the use of a 12" mulch sock. 18" is the currently approved height for compost filter socks.
The 2016 Manual should specify ASTM 4355 standards, or whatever the group feels is appropriate, for the photo- or biodegradability of a sock. The standards should be written down and tested so they can be understood.	Changed language to "should have 1/8 in openings"	6-137	
Most of my comments were covered by other stake holders. The concern I spoke about at the public meeting was to insure a standard is established for the mesh material used on compost filter socks consistent with silt fence requirements for UV protection. Without this requirement material could degrade prematurely before the project is completed.	No action		Requirement that it must maintain 80 percent of the height addresses this concern (*see* 6-138, under Maintenance).
7-- C system wooden stake size needs correction 1 7/8" x 1 3/4" is correct, not 2" x 2 "	No action		
Post Size Under S <u>Steel</u> Post 1.3 lb/ft min. **(change to show approved GDOT spec of 1.15 lb/ft -1.25 lb/ ft,** the 1.3 lb/ft size currently listed above, is not common for the state of Georgia)	Changed dimensions under Type Sensitive	6-144, Table 6-27.2	
Post Size Under S <u>Oak / Hardwood</u> Post 2" x 2" x 48" should show the allowed tolerance given by GDOT	No action		
There are specific height sizes for Type A, B & C Silt Fences listed in the book; There are no height sizes listed for Compost Filter Socks and we believe that there should be in both Checkdam applications and Sediment Barrier Type B application.	No action		18" is the currently approved height for compost filter socks.

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
In my opinion your write up on TR or tree protection as a BMP is woefully inadequate and incorrect...you state that the diameter of the CRZ in feet is equal to 1.5 multiplied by the DBH (measured in inches)...if I am not mistaken this is the RADIUS of the CRZ and not the diameter.....	Changed according to recommendations	6-224	
A sign shall be placed on the chain link fence stating in both English and Spanish that the fenced area is a Tree Protection Area and to Keep Out.....you have no mention of cut and fill or suffocating roots by placing fill in the root zone in your write up....no mention or reference to the American National (ANSI) standards for tree care or the International Society of Arboriculture.....	Included advisory reference to the standards mentioned in the comment	6-224	
The placement of a sediment barrier other than trenching silt fence in the root zone should be recommended (Hay bales or wattles/coconut logs).....limit trenching in root zones.... I refer the Green Book Committee and the GASWCC to the following publication: Trees and Development: A Technical Guide to Preservation of Trees During Land Development; Authors Nelda Matheny and James Clark	Included advisory reference to the standards mentioned in the comment		
9--- I would ask for your consideration on the following process , the Alternative BMP process , i feel there needs to be specific testing dates and acceptance dates. much like GDOT's new product evaluation committee that's comprised of multi agencies and it allows new product presentation on certain dates scheduled throughout the year . you present your product to this committee and its functionality . several weeks later you receive a acceptance or denial letter .If product is accepted you are then allowed to locate testing sites. Which typically is 6 months of field testing. your product is monitored by the committee . they evaluate the products performance discuss and hand down either its acceptance or denial for use. i feel strongly that there needs to be a similar set up .Where you have specified dates to introduce your new product , specific site requirements , and a multi agency committee overseeing new product selection & field monitoring throughout testing process. It does not seem logical to update greenbook on a weekly basis which is what will happen without time lines on testing and acceptance.	No action		*See* Appendix A-2; GSWCC will work cooperatively with GDOT and EPD on these decisions.
10-- I would ask for your consideration that any decision for products seeking to be listed as an equivalent BMP whether it be for , Approval , Denial , Applications,or Removal ,That there be a committee that is comprised of multi agencies (GDOT,EPD ,GSWCC,DNR,ETC.) to review and make recommendations to the Over-site Committee. For final say.	Revised to clarify that that EPD and GDOT are in consultation with GSWCC on these decisions.	A-2-2 to A-2-3	Interested parties may petition the Overview Council, *see* Ga. Code § 12-7-7.1.

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
Any individual, local government or agency may submit to GSWCC a request that the BMP be removed from the Equivalent BMP List. This section is concerning because in the 2014 - 2015 calendar year there have continued to be multiple monthly newsletters submitted through the shared mailing list of GSWCC & NPDES Training Institute, T Luke Owen, 70,000 people strong, where pictures of silt fence are still being shown in very bad light and articles were published saying that Georgia waterways were being basically polluted because of this type of product. On the other hand, silt fence has had decades of positive performances out in the field & rarely is a failure reported back to the manufacturer, based on the product design. Most failures are due to poor installation issues and complaints should not be readily accepted as product failures and removed from a list. Due to the present climate & history above, it is our request that a panel consisting of a representative from each of the three agencies, GSWCC, GDOT & EPD along with the oversight committee would have to review & agree on any approvals or removals from the list, before that action took place.	Included the following language: A request for removal are encouraged to focus on complaints independent of ordinary installation and maintenance of BMP.	A-2-2	
Another comment addresses the process of alternative BMP testing. We currently use 3 field trials, based on NDES bench testing, and Commission approval. As a former research soil scientist and civil engineer for the US Army Corps of Engineers at the Waterways Experiment Station, we only used bench testing to identify problems; Over a long period of time, bench tests and field tests did not have common results. We knew that time (as a test dimension) cannot be from bench events to field events. Thus, acceptance criterial should not be based solely on bench tests.	No action		
Concerning field trials, seldom due contractors have an opportunity to test BMP alternatives, especially three times. Second, research institutions create laboratory conditions, not field conditions. A better way to avoid this difference is to establish a testing/evaluation center, similar to ones in Alabama, South Carolina, and Texas. Although there is some difference in their programs, product developers are comfortable in letting these facilities evaluate their products. For several years, the City of Griffin, GA had a program that promoted field testing. Further, an annual "Field Day" became a popular focus for all involved in erosion and sediment control devices. Unfortunately, the Griffin program was recently discontinued. Georgia would greatly benefit from a product evaluation center. Location and financing would be of great concern. Speaking as a product designer, I would certainly support such a facility financially, as I am sure others would do also. The Manual and its 'updates' would be a major product of this endeavor.	No action		

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
One agency (GSWCC) has the discretion to remove a BMP. GDOT believes this should be a GSWCC/EPD co-operative decision.	Revised to clarify that that EPD and GDOT are in consultation with GSWCC on these decisions.	A-2-1 to A-2-2	
For the majority of projects GDOT is involved with, NOT is 30 to 36 months after construction begins and often longer. This is an excessive period of time to wait for the NOT to be able to submit an application for an equivalent BMP. We recommend that EPD be able to waive this restriction if after a site inspection they determine the application can move forward.	No action		
Regarding the Equivalent BMP List, he commented that any decision for accepting and removing items from the List should be made by a multi-agency committee, and the ultimate decision should be enforced by the Erosion and Sediment Control Overview Council.	Revised to clarify that that EPD and GDOT are in consultation with GSWCC on these decisions.	A-2-2 to A-2-3	
11- As always thank you all for your hard work and considerations on the NEW 2016 green book , If i can be of any assistance or need to clarify feel free to call [phone number]	No action		
Being a public agency the process by which GDOT finalizes plans and administers contracts for project to be awarded to a contractor is a thorough, quality-focused endeavor. Plans have to be finalized 18 weeks before bids are opened on the project. Given that the final revisions of the manual will not be accepted until November 19, 2015, projects that require changes are already beyond the time limit to have changes in. This will mean revisions to the plans costing the taxpayer additional money in terms of engineering and construction to make the changes in order to become compliant with the new requirements. In light of this GDOT would like to be afforded an extension to be in compliance with the 2016 edition until July 1, 2016.	No action		For all plans, GSWCC will work with applicants to ensure a smooth transition.
Finally, although foremost among many States, Georgia could benefit from BMP experiences in other states. This I encourage you to establish a dialogue with similar agencies/commissions and gain from their programs.	No action		
There will always be a need to 'update' our Manual, Some BMPs are now proven ineffective, and other new ones have appeared. A very important aspect of using the Manual is keeping it updated. Once a decade is insufficient. Therefore my first suggestion is that the Commission initiate a web-site program that can disperse results of trial tests to designers and field contractors. I have observed several field demonstrations of the same goal by different persons who are not aware of others doing the same thing.	No action		Equivalent BMP List will be posted periodically.

PUBLIC COMMENT	ACTION TAKEN	Cite	RESPONSE, IF ANY
[Commenter] requested that the 2016 Edition of the Manual expressly state, "GSWCC will not recognize NTPEP testing for the state of Georgia." He cited concerns with errors, inconsistencies, and faulty testing that were apparent in videos of the testing process for establishing performance standards in the Sixth Edition of the Manual.	Included the following language: Only approved ASTM standards will be accepted for repeatable bench testing; working test methods will not be accepted.	A-2-2 to A-2-3	
[Commenter] commented that C-pop is a good product, but there should be certain parameters on the post or on the wire for stronger materials. He said that 14-gauge is a very cheap product and the 2016 Edition should specify what is a qualified product. The responsibility for a bad product should fall to the installer.	No action		
[Commenter] commented that, among the photographs of alternative BMPs in the Manual, there should be a photograph of the GDOT C-system alternative for a wire-backed system.	No action		