

**Memo to the Water Quality GIT re: Erosion and Sediment Control on Extractive for 2015 Progress
Reviewed by WTWG on 07152015**

Introduction: The WTWG was asked to consider three options for how best to simulate nutrient and sediment loads and reductions to those loads from the extractive land use for 2015 Progress. The options were:

Option 1 (No Change): This option would allow each state to continue submitting Abandoned Mine Reclamation in the way they have always submitted the BMP. Abandoned Mine Reclamation converts extractive areas to forest. There would be no addition of Erosion and Sediment Control on Extractive lands. The BMP would remain interim, and would only be available for planning scenarios. This option would not violate the calibration of the Phase 5.3.2 Watershed Model, but would make it difficult to compare extractive loads from 2015 Progress to 2015 Milestones for states who used Erosion and Sediment Control on Extractive in 2015 Milestones.

Option 2 (AMR on All Extractive Lands): This option would allow each state to submit Abandoned Mine Reclamation on all extractive lands in an attempt to simulate permit effluent limits on extractive lands. Abandoned Mine Reclamation converts extractive areas to forest. There would be no addition of Erosion and Sediment Control 1 on extractive lands. The BMP would remain interim, and would only be available for planning scenarios. This option would violate calibration of the Phase 5.3.2 Watershed Model, and would likely over-estimate reductions to sediment and nutrients that are occurring on these lands due to permit effluent limits. This option would still make it difficult to compare extractive loads from 2015 Progress to 2015 Milestones for states who used Erosion and Sediment Control on Extractive in 2015 Milestones.

Option 3 (ESC on Disturbed Land and AMR on Undisturbed): This option would allow each state to submit Abandoned Mine Reclamation on only the undisturbed portion of each state's extractive lands to reflect forest cover or plantings on undisturbed areas. This option would also allow each state to submit Erosion and Sediment Control on Extractive on the disturbed portion of extractive lands to reflect permit effluent limits. This BMP reduces nutrients 25% of N, and 40% of P and TSS from extractive lands. The BMP would no longer remain interim. This option would violate calibration of the Phase 5.3.2 Watershed Model, and may over-estimate reductions to sediment and nutrients that are occurring on these lands due to permit effluent limits. This option would make it less difficult to compare extractive loads from 2015 Progress to 2015 Milestones for those states who used Erosion and Sediment Control on Extractive in 2015 Milestones.

Recommendation: After considering all options, the WTWG was unable to come to consensus. By default, a lack of consensus results in the states continuing submitting BMPs on extractive lands in the way described in Option 1 above, with no change to current submittal process. However, the WTWG acknowledges that this creates inequity when assessing 2015 Milestones due to (1) historic differences in how states submitted BMPs on this land use and (2) because some states planned to use the interim BMP, Erosion and Sediment Control on Extractive to reduce loads by 2015, and this will no longer be possible since the BMP receives no credit in the Partnership's modeling tools for annual progress runs. Because of this, the WTWG recommends that EPA and the Partnership:

- 1) Does not evaluate programmatic progress towards the interim BMP, Erosion and Sediment Control on Extractive OR other interim BMPs; and
- 2) Removes all reference to the interim BMP, Erosion and Sediment Control on Extractive AND all other interim BMPs from public documents and Web sites as these BMPs should not be assessed for milestone purposes given their interim status.