

Comments on the Draft 2019 SWMMWW		
Draft 2019 SWMMWW Section (select from drop down)	Comment	Comment Made By
BMP C120: Temporary and Permanent Seeding	Page 324: "Between October 1 and March 30 seeding requires a cover of mulch or an erosion control blanket until 75 percent grass cover is established." Hydraulically-applied Erosion Control Product suggested instead of 'mulch' for winter stabilization	Damon Sump - Profile Products
BMP C120: Temporary and Permanent Seeding	Page 325: "Or, enhance vegetation by: -Installing the mulch, seed, fertilizer, and tackifier in one lift. -Spread or blow straw over the top of the hydromulch at a rate of 800-1000 lb/ac -Hold straw in place with a standard tackifier" the addition of straw and a tackifier may be redundant depending on the intial mulch used	Damon Sump - Profile Products
BMP C120: Temporary and Permanent Seeding	Page 330: BFM Category - Incorporate performance (C factor from third party lab, Water Holding Capacity, Vegetative Establishment, Functional Longevity, wood fiber content, minimum 10% tackifier pre mixed by manufacturer) requirements of BFM and application rate guide based on slope conditions	Damon Sump - Profile Products
BMP C121: Mulching	Page 331: "Tackifier shall be plant-based, such as guar or alpha plantago..." alpha plantago vs plantago? Plantago is not commonly used in this region due to its poor performance when compared to guar based tackifiers.	Damon Sump - Profile Products
BMP C121: Mulching	Page 331: "Always use a 2-inch minimum mulch" For hydraulically applied mulch? Clarify	Damon Sump - Profile Products
BMP C121: Mulching	Page 333: Mulch Material: Hydromulch; incorporate performance requirements similar to BFM (BMP C120)	Damon Sump - Profile Products
BMP C121: Mulching	Page 333: Mulch Material: Hydromulch; incorporate application rate guidelines dependent on slope conditions. Rates currently listed as 1,000-1,300 lb/ac but minimum application rate was listed as 1,500lb/ac in section C120	Damon Sump - Profile Products
BMP C121: Mulching	Page 333: Mulch Standards and Guideline Table; add BFM standards, rates, and remarks to table	Damon Sump - Profile Products
BMP C121: Mulching	Page 334: Mulch Material; Wood-Based Mulch or Wood Straw; what is Wood Straw? Is it a proprietary product?	Damon Sump - Profile Products
BMP C125: Topsoiling / Composting	Page 344: Conditions of Use; In areas where topsoil availability is limited or where topsoil applications are difficult (slope, limited access, frozen/wet ground, etc) application of Biotic Soil Technology shall be incorporated.	Damon Sump - Profile Products
BMP C125: Topsoiling / Composting	Page 345: Design and Installation Specifications; When using the option of Biotic Soil Technology hydraulically apply BST at rate determined from organic matter content in existing substrate.	Damon Sump - Profile Products
BMP C126: Polyacrylamide (PAM) for Soil Erosion Protection	Page 351: "Some tackifier product instructions say to use at a rate of 3 – 5 lbs per acre, which can be too much." Application rate, not to be confused with the mixing rate.	Damon Sump - Profile Products
BMP C130: Surface Roughening	Page 352: Design and Installation Specifications; graded areas not applicable for erosion control blanket BMP as smooth grading is required. Surface roughening is compatible with Hydraulically applied erosion control products and reduces erosion potential of bare soil.	Damon Sump - Profile Products