

Stabilization Photos Under EPA's CGP

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Agenda

- CGP photo requirements
- EPA photo evaluation
- Sample photos
- Questions



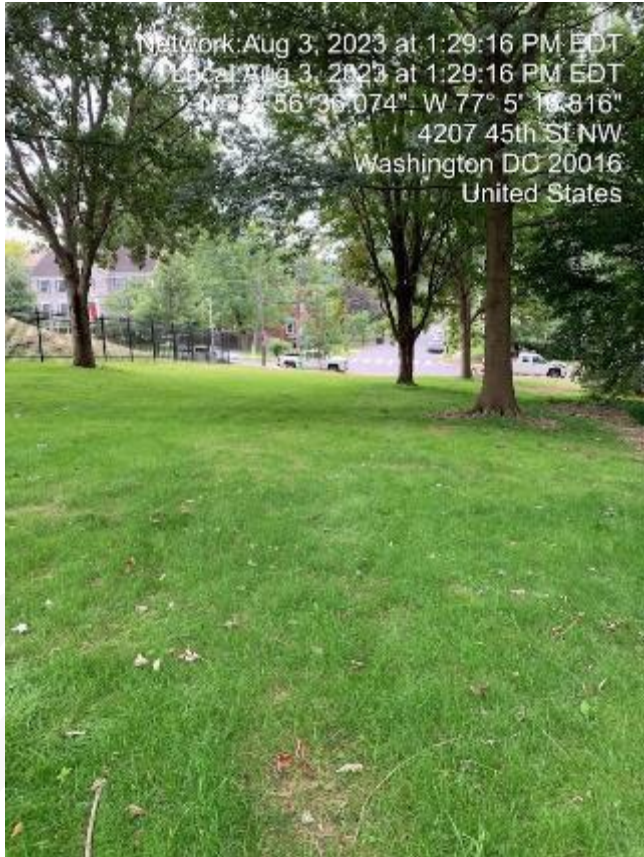
CGP Photo Requirements

To document that you have met these stabilization requirements, you must take either ground or aerial photographs that show your site's compliance with the Part 2.2.14 stabilization requirements and submit them with your NOT.

You must also comply with the following related to these photographs:

- Take photographs both before and after the site has met the final stabilization criteria in Part 2.2.14c;
- All photographs must be clear and in focus, and in the original format and resolution; and
- Include the date each photograph was taken, and a brief description of the area of the site captured by the photograph (e.g., photo shows application of seed and erosion control mats to remaining exposed surfaces on northeast corner of site).

Photo Evaluation



- Purpose: (1) Evaluate compliance with the new photo requirements, and (2) Assess whether changes may be needed to improve compliance and/or the quality of information we receive
- Random selection of 54 site photos that are geographically representative
- Evaluate each site's photo submittal for compliance with regulatory criteria
 - Were stabilization photos submitted?
 - Were both before and after photos included?
 - Were photos clear and in focus?
 - Were the dates and a description included?
 - Could we tell if site met the stabilization requirements?

Photo Evaluation

- Developed a review checklist to use for each photo
- Also catalogued what type of stabilization controls the site appeared to be using (seeding, sod, plantings, or non-vegetative)
- Noted whether site is stabilized through:
 - 70% vegetative cover;
 - Permanent non-vegetative cover; or
 - The site looks unstabilized
- Guessed also whether one of the exceptions for stabilization may have applied
- Included notes about any concerns



A																									
1	Chosen Permits																								
2	1. Were before and after photos submitted?	No	Yes	No	No	Yes	Yes	Yes	No	No	Yes	Yes	No	No	No	No	No	Yes	No	No	No	Yes	Yes	Yes	No
3	If No, which photos were submitted	After		After	After				After	After			Unclear	After	After	After	After	Unclear		After	Unclear	After			Unclear
4	2. Are all photos clear and in focus? (Photos were not manipulated. No filters were added.) If No or Uncertain, add photo to the Bad examples folder (Name the picture file ID #)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
5	3. Were the following included in the text field																								
6	Date of Each Photo	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	Yes	No	Yes	Yes	Yes
7	Description of area captured by each photo	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
8	4. What type of stabilization measures are shown?																								
9	Seeding	Unused	Seeding	Seeding	Unused	Seeding	Seeding	Seeding	Unused	Unused	Unused	Seeding	Unused	Unused	Unused	Seeding	Unused	Seeding	Unused	Unused	Unused	Unused	Unused	Unused	Unused
10	Sod	Sod	Unused	Unused	Unused	Unused	Unused	Unused	Sod	Unused	Unused	Unused	Sod	Sod	Unused	Unused	Unused	Unused	Unused	Unused	Unused	Unused	Unused	Unused	Unused
11	Plantings - Trees, shrubs, low lying plants	Plantings	Unused	Unused	Unused	Unused	Unused	Unused	Plantings	Unused	Unused	Unused	Plantings	Unused	Unused	Plantings	Plantings	Plantings	Plantings	Unused	Plantings	Plantings	Unused	Unused	Unused
12	Any of the above vegetative measures combined with geotextile mats, turf mats, non-wool fiber fabric	Unused	Unused	VegMat/Combo	Unused	VegMat/Combo	VegMat/Combo	Unused	Unused	Unused	Unused	Unused	Unused	Unused	Unused	Unused	Unused	Unused	Unused	Unused	Unused	Unused	Unused	Unused	Unused
13	Other: List them out	N/A	N/A	N/A	seeds?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
14	Permanent non-vegetative measures - pavement, concrete, structures, tarp explanation provided to qualify for exception (see H5)	Impervious	Unused	Impervious	Unused	Impervious	Unused	Unused	Impervious	Impervious	Impervious	Unused	Impervious	Unused	Impervious	Impervious	Unused	Impervious	Impervious	Impervious	Impervious	Impervious	Unused	Impervious	Impervious
15	No evidence of stabilization	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Exemption applies	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
16	5. The areas in the photos meet the following stabilization requirements																								
17	Fully Stabilized:																								
18	Uniform, evenly distributed, perennial vegetation (70% of vegetative cover)	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes	Yes	No	No	No	No	No	No	Yes	No	No	No
19	Permanent non-vegetative measures	Yes	No	Yes	No	Yes	No	Yes	Yes	Yes	Yes	No	Yes	No	No	Yes	No	No	Yes	Yes	Yes	Yes	No	Yes	Yes
20	Exceptions (Areas don't need to be stabilized)																								
21	Arid, semi-arid, and drought-stricken area was seeded or planned to establish 70% of vegetative cover within 3 years and, to the extent necessary to prevent erosion on the seeded or planted area, non-vegetative erosion controls have been applied to provide cover for at least 3 years without active maintenance	No	No	No	No	No	No	No	No	No	No	Yes	No	No	No	No	No	No	No	No	No	No	No	No	No
22	Agricultural land restored to pre-construction agricultural use. (This will be difficult to conclude from a photo.) Areas to remain disturbed. When the intended function of a specific area necessitates that it remain disturbed, and	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No

Study Results

Study Input

Example

Study Data

Randomizer



Site in Washington State (Federal)



Site in North Carolina Tribal Lands

Pre-Stabilization



Post-Stabilization



Site in New Hampshire

Pre-Stabilization



Post-Stabilization



Site in New Mexico



Site in Arizona Tribal Lands

Pre-Construction



Post-Stabilization



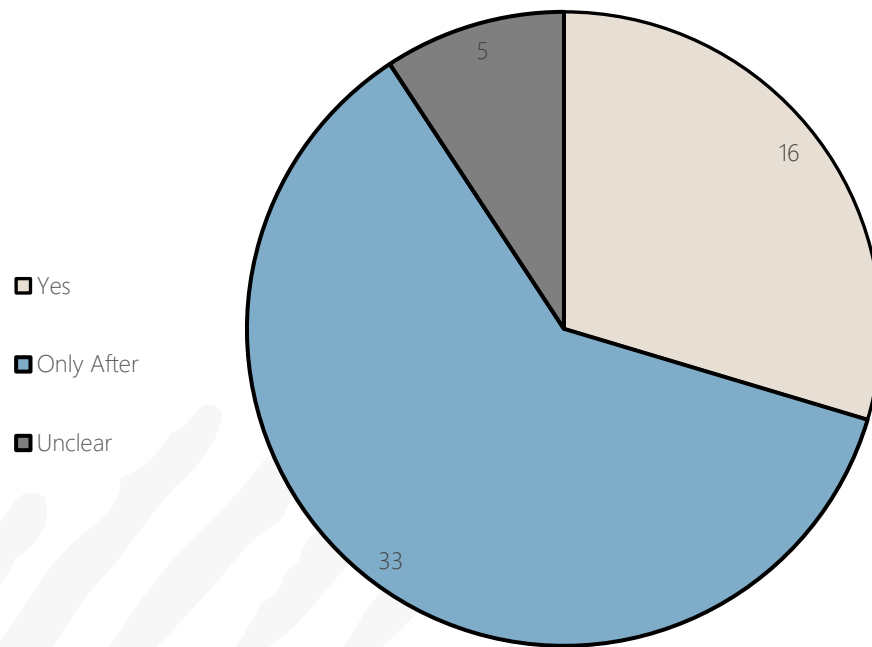


OVERVIEW OF FINDINGS

Navigating the future

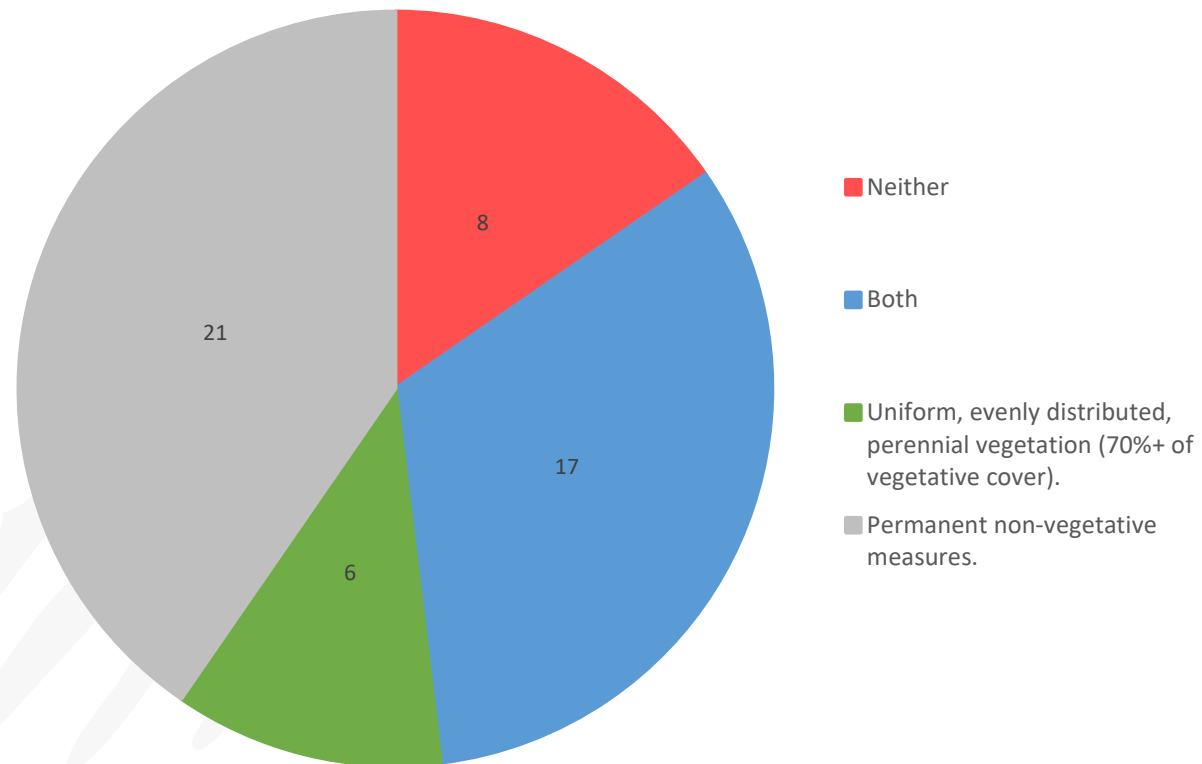
Were Before and After Photos Submitted?

Were before and after photos submitted?



Stabilization Methods Used to Comply

Stabilization Method Employed



QUESTIONS

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