

From: Richard Street
To: [CWAwotus](#)
Cc: [Hanson, Andrew](#)
Subject: Definition of WOTUS
Date: Thursday, April 27, 2017 5:57:36 AM
Attachments: [image002.png](#)

CWA/Andrew

First my background:

I am (as you can tell with my signature) the environmental engineer for a locality in Virginia. I am also a former VDOT district Drainage engineer (River Mechanic) which means I addressed large culverts, bridges shore repair and stream restorations.

My volunteer jobs are

Currently I am the Director of the Virginia Environmental Professionals Organization (VAEPO) which is a group in Virginia that represents local government environmental folks to make certain their voices are heard.

I am also appointed by the governor on the State Water Commission in charge of groundwater recharge for our coastal plain aquifers.

I am also appointed by the governor and currently hold the role of Vice Chairman for the State Soil and Water Conservation Board which is in charge of floodplain management, dam safety and all farming water quality and quantity.

I've been performing site civil engineering related practices for 39 years and have produced new construction sites that produce no pollution discharge using innovative stormwater management that allows no discharge. This was long before EPA even started requesting it of VA. I also kept arguing with EPA and became the first and I believe the only locality that has been officially delisted from the MS4 program. We still however hold our developers to a higher standard for onsite water quality and quantity discharges and they all respect it.

To the meat of my email:

My opinion for WOUS I reference slide's 9 & 10 and suggest;

1. "Relatively Permanent Waters" – Perennial streams only
My reasoning is that in VA we have a boatload of streams that are seasonal or even wet weather. Many of the seasonal are impacted by droughts that last for only a few days before they dry up because they recharge the groundwater quickly. This also follows our understanding for our Chesapeake bay portion of the state that follows the Chesapeake Bay Act as where our limits end for resource protection area limits.
2. "Continuous Surface Connection" – Wetlands must directly touch jurisdictional waters
This is currently what we use for our CBA-RPA designation and makes sense. The only clarification we need in the field are the old farm road (some from the 1700's) that were clearly placed for access farm fields. They at some point placed these roads with hollowed out trees as culverts that later were upgraded to metal or concrete. The 1800's civil war maps even show the major wetland as being cut off from the true perennial flow river or stream however it should be identified and defined to help us and others determine their

status and permitting impacts.

I will forward the link I was provided to the members of my VAEPO and suggest they provide you with their thoughts too. If you need or would like to discuss my thoughts in more detail I am available and have helped with some of the EPA stormwater/groundwater groups in the past.

Thank you for your time.

Richard A. Street

Sr. Environmental Engineer

Dual Combined Administrator (DCA0122)

Chesapeake Bay Division

Zoning Department

Spotsylvania County

9019 Old battlefield BLVD. Suite 300

Spotsylvania VA 22553

(540) 507-7426

rstreet@spotsylvania.va.us

