



Tyler Craddock
Director of Public & Government Affairs

September 22, 2006

Ms. Nora Iseli
United States Army
Corps of Engineers
Central Virginia Field Office
444 Abby Lane
Howardsville, VA 24562

Dear Ms. Iseli,

Thank you for the opportunity to comment on the Corps of Engineers' proposed requirements regarding delineations of wetlands and waters and as-built surveys for work completed under a Corps permit.

This regulation as it is written is unnecessary and will only serve to add unneeded cost to the production of new homes for the citizens of the Greater Richmond area.

With regard to the requirement that delineations be surveyed, this is a decision that should be left to each developer. If there is a doubt about a delineation, or if the flagging is damaged or removed, then perhaps a survey would be in order. Being that as it may, it is certainly not necessary to require such surveys across the board.

With regard to the requirement for an as-built survey or ortho-rectified photograph for certain projects, this is again a regulation that is unnecessary and one that would only add unnecessary cost to the production of new homes. Such a requirement might be justified in those limited instances where there is reason to believe that a violation of the Corps permit has occurred. If the Corps were to proceed in that fashion, then the existing regulation should confine the requirement to those instances where there is reason to believe that a violation occurred, and it should require the Corps in requesting the survey or ortho-rectified photograph to state the specific violation that it believes has occurred.

As it stands, we oppose this proposed regulation. The Corps should go back to the drawing board and craft a proposal that addresses the concerns we have raised.

Again, thank you for the opportunity to comment on this proposal. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Tyler Craddock".

Tyler Craddock
Director of Public and Government Affairs