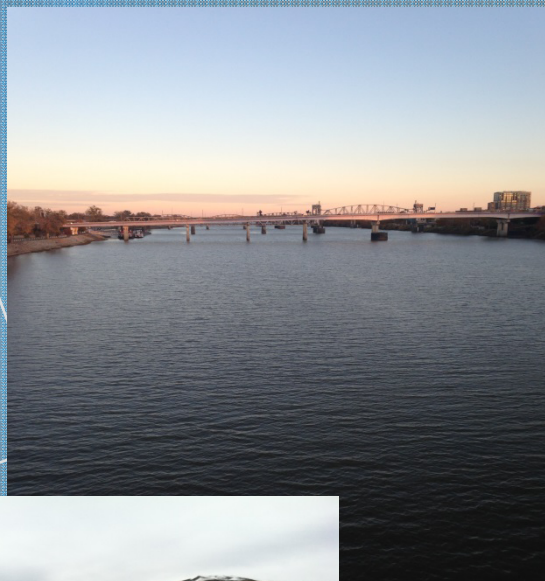


Waters of the US EPA Docket Survey Random Perspective

Kelly Collins

October 29, 2014



**CDM
Smith**

WOTUS EPA Docket

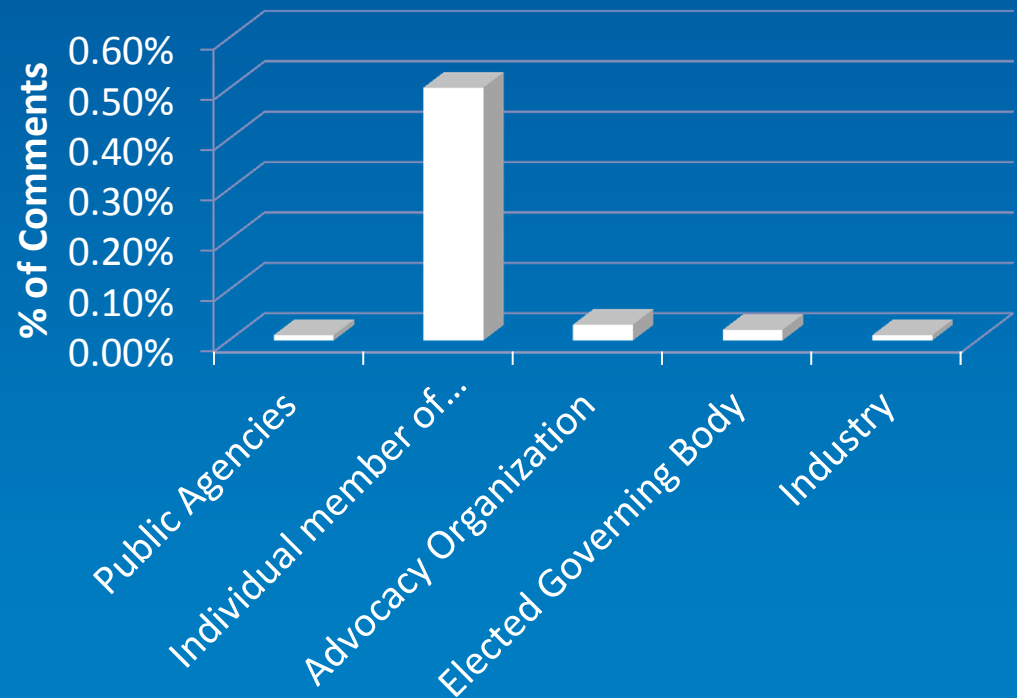
- **Docket ID: EPA-HQ-OW-2011-0880**
 - <http://www.regulations.gov/#!docketDetail;D=EPA-HQ-OW-2011-0880>
 - Impacts and Effects: None
 - CFR Citation: Not Yet Determined
 - Priority: Other Significant
- **As of October 29: 5,971 comments received**

Random Sampling

- **Goal: to see the comments as EPA will see them, without reading 9000+ comments**
- **How: random number generator to pick comments on each page**
- **Problem: regulations.gov website does not respond well – limited number reviewed**

Commenters

- The largest percentage of commenters are from private citizens
- Nearly all comments from citizens are from a script



Public Issues

Reasons for Opposition

Lack of Definition	0.084%
Ditches	0.084%
USACE timelines for review	0.042%
Oppose rules as written	0.554%
Rules unnecessary	0.063%
Expand jurisdiction	0.439%
Inclusion of groundwater	0.021%
Insufficient collaboration	0.052%
Storm water infrastructure not exempt	0.021%
Infringement on property rights	0.272%
Use common sense	0.021%
Timing with Connectivity report	0.021%
Cost-benefit analysis flawed	0.021%
Maintenance activities regulated	0.010%
Does not apply to 50 states	0.010%
EPA incapable of protecting water	0.021%
show maps of before and after	0.010%

Reasons to Support

EPA should protect all waters	0.104%
Implement the rule immediately	0.167%
Support rule as written	0.094%

WESTCAS Issues

- Oppose rules as written
- Definitions unclear or not appropriate
- Groundwater connectivity
- Storm water infrastructure not exempted
- Ditches
- Isolated impoundments and upland tributaries not exempted
- USACE determinations recognized and timeliness

Comments with Respect to WESTCAS Issues

