

TTL considers the wetlands (WA and WB) to represent jurisdictional features.

4.3 Streams Identification and Methodology

When observed, TTL utilizes the *North Carolina Division of Water Quality (NC DWQ)– Methodology for Identification of Intermittent and Perennial Streams and Their Origins v. 4.11, September 1, 2010 (NC Method)* technical guideline to determine the most appropriate classification of each subject stream. This technical guideline for stream identification is the preferred methodology for distinguishing between intermittent and perennial streams in the southeast United States and requires evaluation of 26 attributes of the stream and assigning a numeric score to each on the *NC DWQ Stream Identification Form Version 4.11*. A four-tiered, weighted scale is utilized for evaluating and scoring the features categorized in sets of geomorphic, hydrologic, and biological attributes. Additionally, TTL utilized the *Regulatory Guidance Letter No. 05-05: Ordinary High Water Mark Identification* (USACE, 2005) as the basis for the delineation, mapping, and linear footage/areal estimations of on-site streams.

4.4 Streams Findings

TTL did not identify streams within the review area. TTL identified one (1) man-made ditch consisting of approximately 1,409 linear feet as follows:

Table 4: Stream Summary

ID	Description	Area (Acres)	Length (linear feet)
D-1	Man-made Ditch	0.095	1,409

TTL’s opinion that D-1 is a man-made ditch which represents a relatively permanent water feature that flows directly into (a)(1) waters: Mud Swamp. Based on review of historical aerial photography, D-1 was constructed between 1974 and 1979, during the development of the SAFT facility to the northeast. However, TTL opines that D-1 represents a USACE jurisdictional feature. Intermediate portions of D-1 exhibit geomorphic stream features and wretched vegetation consistent with State Water requiring a buffer, while portions of D-1 support wetland vegetation and function primarily as a wetland. Selected site photographs and historical aerial photographs are included in Appendix B.

4.5 Open Waters

TTL evaluated the delineation area for open waters based on the below definition. The 1986/1988 regulatory definition of WOTUS [40 CFR 230.3(s)] included inland open waters under the following: