Task 10 FY 90
Final Work Product

Habitat Management Division - Spec
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Permit Compliance and Inspection Program: Findings and Guidance Document

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INTRODUCTION

The Virginia Marine Resources Commission ("the Commission" or "VMRC"), in conformance with Section 62.1-3 of the Code of Virginia, is the State agency responsible for issuing permits for encroachments in, on, or over State-owned submerged lands throughout the Commonwealth. The Commission has possessed this regulatory authority since 1962. We currently process over 2,000 applications and issue nearly 500 permits annually. Virginia is a "low water state" and assumes jurisdiction of submerged lands channelward of the mean low water mark in tidal waters, and has regulatory authority channelward of the ordinary high water mark on most naturally occurring nontidal perennial streams.

In addition to managing the Commonwealth's submerged lands, the Commission also regulates certain activities in tidal wetlands and coastal primary sand dunes pursuant to Chapters 2.1 and 2.2 of Title 62.1 of the Code of Virginia. Local governments have the option to adopt and administer the ordinance. VMRC asserts original jurisdiction in those Tidewater localities which have not assumed local regulation through the adoption of the model wetlands and dunes ordinances. Even where locally adopted and implemented, the Commission retains oversight responsibilities for all decisions made by those local wetlands boards.

The regulatory activities conducted by the Commission and the 34 local wetlands boards are integral core components of Virginia's approved Coastal Zone Management Program. The permit review processes used by the Commission and these local wetlands boards ensures that necessary economic development is permitted in a manner which minimizes adverse impacts to the valuable natural resources within our coastal zone.

Permit compliance is a mandatory component of any effective regulatory program. As such, it is essential that the terms and conditions contained in those permit documents be followed if we are to realize the full benefits of the regulatory program. Without such permit compliance, the regulatory process breaks down and serves only to increase bureaucracy.

In July 1990, Senate Bill 183 became law (Ch. 881 Acts of Assembly 1990). This legislation provided the Commission and local wetlands boards with the authority to issue restoration orders and assess civil charges for violations of the applicable subaqueous, wetlands and sand dune statutes. An ability to accurately determine and monitor compliance with permit requirements is essential if the agency and wetlands boards are to effectively carry out the intent of this legislation.

Unfortunately, Commission staff does not currently have a standardized procedure for monitoring permit compliance. Instead, the staff engineer assigned responsibility for a particular locality will attempt to inspect projects which are under construction or have been recently completed. Quite often such compliance inspections are in response to the receipt of an inquiry or complaint. Additionally, the Commission's marine law enforcement personnel are often aware of permitted projects in their localities and occasionally make site inspections during the performance of their daily duties. In either case, however, only a small percentage of the projects permitted by VMRC are routinely inspected for compliance.

Permits issued by wetlands boards are also not always carefully reviewed for compliance upon project completion. Independent studies conducted by Bradshaw (1990), Hershner et al. (1985) and a survey conducted in conjunction with this project indicate that the extent of permit compliance monitoring by local wetlands boards varies between localities. That effort

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ranges from rigid compliance monitoring programs to virtually nonexistent monitoring. The level of monitoring is quite often dictated by both the amount of permit activity and available staff time. Therefore, although permit compliance monitoring is an essential element of the regulatory process and a valuable tool for gauging the effectiveness of the permitting system, there is not a standard procedure for such monitoring, and only a few wetlands boards actually utilize a comprehensive compliance program.

This study, funded in part by the National Oceanic and Atmospheric Administration through a grant received under the Coastal Zone Management Act of 1972 as amended, was conducted to study permit compliance, develop a permit compliance and monitoring program for use by the Marine Resources Commission, and to make recommendations to the local wetlands boards, where appropriate, in an effort to help improve their permit compliance efforts.

COMPLIANCE SURVEY

The compliance survey was designed to investigate and gauge the effectiveness of the various compliance monitoring programs currently utilized by VMRC and local wetlands boards. The survey was intended both to identify existing compliance shortcomings and to ascertain effective compliance monitoring techniques in order to develop concise recommendations to enhance compliance monitoring programs.

Methods

One hundred and forty (140) projects were randomly selected from a pool of 778 applications submitted in 1989 for permits to use or develop tidal wetlands or to encroach in, on, or over State-owned submerged land. Applications for subaqueous permits outside of the Tidewater region were excluded from the selection pool, as were applications which did not require a permit from either the local wetlands board or VMRC. Also excluded were applications which only requested authorization for private boathouses. Although more recently issued permits could have been used, 1989 permits were selected because it was believed that the majority of these projects would likely have been constructed by the time of the survey.

The 140 selected applications were screened and those applications which were submitted after-the-fact, involved only subaqueous dredging, or had not yet received a permit due to delays or denial were discarded. After screening, 120 projects remained in the sample group. Prior to conducting the survey we consulted with Mr. Lyle Varnell and other members of the Wetlands Department at the Virginia Institute of Marine Science and determined that a sample size equal to or greater than 120 should provide statistically significant results.

Table 1.
Number and jurisdictional type of project selected for the compliance survey in each locality.

Locality	Rural/Urban	# of Projects	Type of Project
Accomack	Rural	15	3S, 7W, 5B
Chesapeake	Urban	4	4W
Essex	Rural	1	1B
Fairfax	Urban	1	1W
Gloucester	Rural	3	1S, 1W, 1B
Hampton	Urban	5	32, 2W
James City	Urban	3	3W
King George	Rural	1	1W
King and Queen	Rural	1	1W
King William	Rural	1	1B
Lancaster	Rural	9	1S, 5W, 3B
Mathews	Rural	3	3W
Middlesex	Rural	8	1S, 5W, 2B
Norfolk	Urban	8	1S, 6W, 1B
Northhampton	Rural	1	1S
Northumberland	Rural	19	18W, 1B
Poquoson	Urban	1	1W
Prince William	Urban	1	1B
Stafford	Urban	3	2S, 1W
Suffolk	Rural	1	1W
Virginia Beach	Urban	20	14W, 6B
Westmoreland	Rural	7	4W, 3B
York	Urban	4	3W, 1B
Totals			
23 Localities	13 Rural	120 Projects	13 Subaqueous
	10 Urban	Reviewed	81 Wetlands
			26 Both

Permit activity per locality is highly variable. For example in 1989 there were no applications received in some localities while in others over 200 were reviewed. Since permit activity varies widely between localities and because the study hoped to draw conclusions on the

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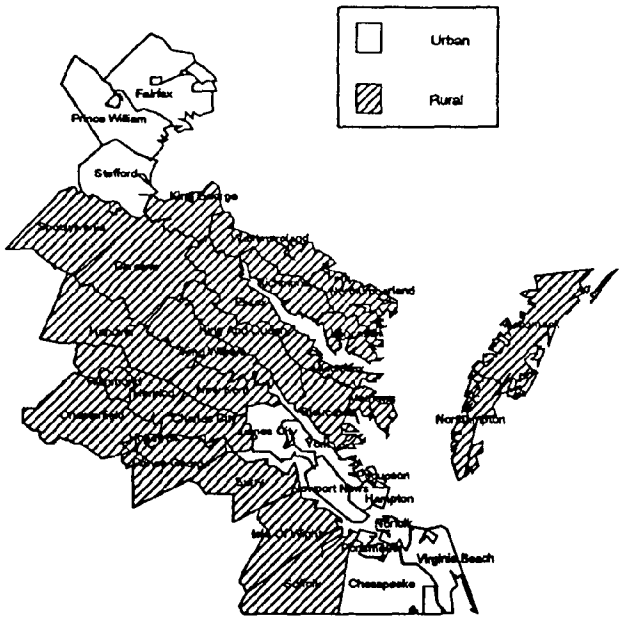
Figure 1. Tidewater Virginia



overall effectiveness of permit compliance within the coastal zone, no effort was made to ensure that all localities were represented in the survey. Instead, it was anticipated that the random sample would result in a sample group which more accurately reflected the average permit activity per locality. Therefore, the number of projects reviewed in each locality varies according to the observed permit activity in 1989.

Twenty-three (23) of the 49 Tidewater localities were represented in the sample group. Figure 1 and Table 1 illustrate the Tidewater region and indicate the number of projects reviewed in each locality. Eighty-one (81) of the selected projects required only a wetlands permit, 13 required only a subaqueous permit and 26 impacted both jurisdictions and required subaqueous as well as wetlands permits.

Site inspections were made of all the 120 selected projects to determine the degree of compliance. Results of the compliance inspections were grouped into five categories:

1. Project not constructed
2. Unable to determine compliance
3. In compliance with the permit document
4. Moderately in compliance with the permit document.
5. Out of compliance with the permit document

Categories 1, 2 and 3 were fairly straightforward and easy to assess. The distinction between those projects considered to be in moderate compliance or out of compliance was more difficult to make and became somewhat subjective. As a rule, however, those projects considered to be moderately in compliance possessed an average additional encroachment which did not exceed 6 inches greater than the permitted alignment, and had length and square foot measurements which were no more than 10% greater than that authorized. Those projects exceeding either of the above thresholds were considered to be out of compliance.

As previously mentioned dredging projects were not included in the survey. These projects were excluded because we believed that it would be difficult to distinguish between man-made and natural post-dredging deviations in depth contours. However, recommendations to monitor compliance for dredging projects are included in the Recommendations section of this document.

Results

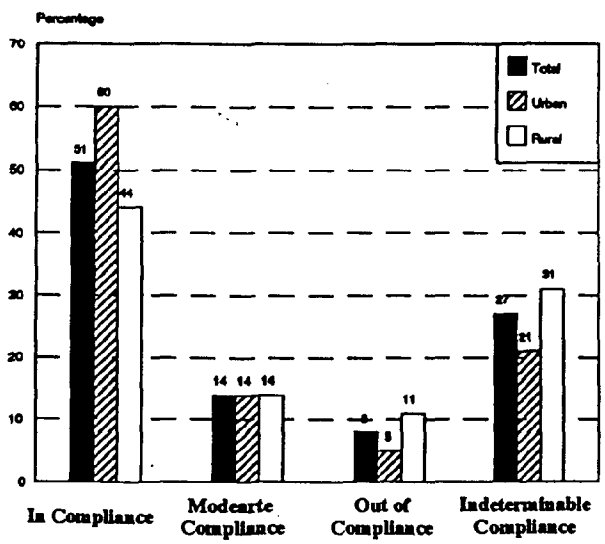
The results of the survey are summarized in Table 2. You will note that the survey results were subdivided into rural and urban categories. This was done in an effort to ascertain if there were any demographic differences in compliance levels. For the purpose of this study, rural localities were defined as those having population densities of less than 140 per square mile; urban localities were defined as having population densities greater than 140 per square mile. The figures for population density were obtained from the 1980 census by the U. S. Department of Commerce (Univ. of Virginia, 1987). This breakdown was also patterned after that used by Bradshaw (1990) in her compliance monitoring study.

In addition to providing the raw numbers for the projects determined to be in a particular category, Table 2 also provides the percentage of constructed projects which were categorized by their level of compliance. These percentages are particularly interesting when evaluating the results. Especially noteworthy are the percentages of projects in which compliance could not be determined. Figure 2 further illustrates this information.

Table 2.
Compiled results of compliance survey conducted for projects permitted in Tidewater during 1989.

	Total	Urban	Rural
# of Projects Reviewed	120	50	70
% of Projects Reviewed	n/a	42%	58%
# of Projects Constructed	98	43	55
% of Projects Reviewed	82%	86%	79%
# in Compliance,	50	26	24
% of Constructed Projects	51%	60%	44%
# Moderate Compliance	14	6	8
% of Constructed Projects	14%	14%	14%
# Out of Compliance	8	2	6
% of Constructed Projects,	8%	5%	11%
# Compliance Interminable	26	9	17
% of Constructed Projects	27%	21%	31%

Figure 2.
Projects categorized by level of compliance.



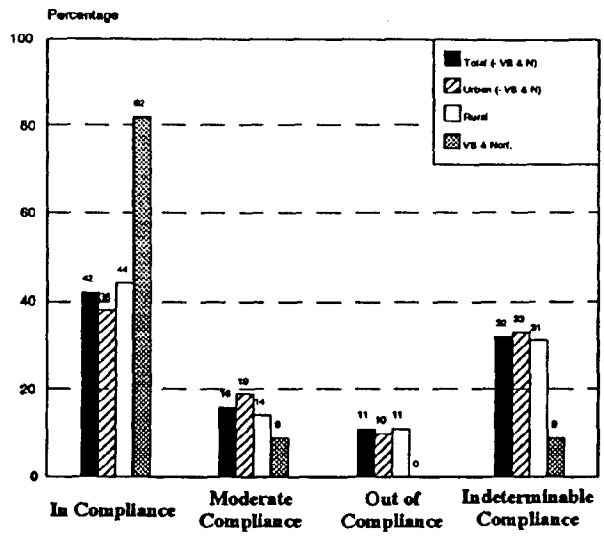
Due to the somewhat subjective nature of the data and the low number of samples in some of the subgroups, no statistical tests for significance were attempted. Nevertheless, there appears to be a discernible difference between rural and urban localities in all the categories other than "Moderate Compliance." A clearer disparity exists, however, when the cities of Virginia Beach and Norfolk are factored independently and then compared to all other localities. This is presented in Table 3 and illustrated in Figure 3.

Table 3.
Compiled results of compliance survey conducted for projects permitted in Tidewater during 1989. Va. Beach and Norfolk factored independently.

	Total	Urban	Rural	Va. Beach & Norfolk
# Projects Reviewed	93	22	70	28
% Projects Reviewed	77%	18%	58%	23%
# Projects Constructed	76	21	55	22
% Projects Reviewed,	82%	95%	77%	79%
# in Compliance	32	8	24	18
% Constructed Projects	42%	38%	44%	82%
# Moderate Compliance,	12	4	8	2
% Constructed Projects	16%	19%	14%	9%
# Out of Compliance	8	2	6	0
% Constructed Projects	10%	10%	11%	0%
# Compliance Indeterminable	24	7	17	2
% Constructed Projects	32%	33%	31%	9%

Figure 3 clearly illustrates a disparity between the cities of Virginia Beach and Norfolk when compared to all-other Tidewater localities. Eighty-two (82) percent of the completed projects reviewed in Virginia Beach and Norfolk were determined to be in compliance, whereas only 42% of all other projects reviewed were categorized as "In Compliance". Also noteworthy is how similar the percentages of the urban and rural localities become once Virginia Beach and Norfolk are factored out.

Figure 3.
Projects categorized by level of compliance. Va. Beach and Norfolk factored indenpendently.



Discussion

A cursory review of the survey results is at first very discouraging. Of all the constructed projects reviewed, only 51% were determined to be in compliance. It is important to note, however, that compliance could not be determined for one reason or another at 27% of the sites visited. The fact that compliance could not be determined does not automatically mean that the projects were not built in conformance with the intent of the permit document.

In fact, it is more encouraging to note that the vast majority of the sites visited even where compliance could not be determined, appeared to have been constructed along reasonable alignments and were often the proper length or width or both. This seems to indicate a general intent to comply with permit requirements. This opinion is further supported by the fact that, of all those projects where compliance could be determined, 89% were determined to be in either total or moderate compliance.

The primary problem identified during the survey was the inability to precisely determine compliance at 27% of the sites visited. Many of the permits did not have adequate drawings or benchmarks to ensure compliance. Additionally, many permits contained ambiguous conditions such as, "approximately" or "as close to the bank as possible", which are by their nature virtually unenforceable. Compliance determinations are made more difficult when the person inspecting the constructed project was not present during the initial site visit and is therefore unfamiliar with preconstruction conditions. Without the aid of precise benchmarks or other means to pinpoint the alignment of a project, compliance determinations are difficult at best and frequently impossible.

As expected, the projects in localities that require more detailed application drawings and information exhibited a higher percentage of determinable compliance. This is illustrated in Figure 3. Compliance could be determined at 91% of the sites inspected in Virginia Beach and Norfolk. Both of these localities require detailed permit drawings with identifiable benchmarks. Both also regularly conduct post-construction compliance inspections. Additionally, Virginia Beach requires professionally engineered project drawings and further requires the permittees to post performance bonds. Those bonds are not released until post-construction inspections have determined that projects are indeed in compliance with the permit granted by the Board.

Not only was compliance usually determinable at the Virginia Beach and Norfolk projects, but the level of compliance was generally higher as well. This is most likely attributed to the regular post-construction inspections. Ninety (90) percent of the projects where compliance could be determined in Virginia Beach and Norfolk were determined to be in compliance and 10% were in moderate compliance. None of the inspected sites were determined to be out of compliance. By comparison, 15% of the sites visited in other localities, were categorized as out of compliance, where compliance could be determined.

Prior to conducting the study, it was anticipated that there would be a marked difference in compliance levels between urban and rural localities. Initially this appeared to be the case. Once Virginia Beach and Norfolk were factored independently from the other urban localities, however, the data revealed very little difference in compliance levels between urban and rural localities.

It appears that the programs being implemented by Virginia Beach and Norfolk are effective in ensuring permit compliance. As a result, the recommendations for improving compliance draw heavily on the examples provided by these localities.

SUMMARY AND RECOMMENDATIONS

The increasing importance of effective compliance monitoring cannot be overstated. Recent legislative changes which authorize VMRC and wetland boards to issue restoration orders and assess civil charges for violations of wetlands, dunes, and subaqueous statutes necessitate compliance programs which can accurately

ascertain whether projects were conducted in conformance with the applicable permit documents. According to the 1988 report by the Year 2020 Panel entitled, "Population Growth and Development in the Chesapeake Bay Watershed to the year 2020", Tidewater will experience continued and rapid population growth over the next two decades. As a result, conflicts between the various competing user groups within the coastal region can only be expected to increase and the issues become more complex. Effective regulation and compliance monitoring will be essential if we are to accommodate and manage this growth while limiting adverse impacts to our finite coastal resources.

When developing compliance monitoring policies it will be important for the wetland boards and VMRC to strike an appropriate balance between an effective program and unnecessary bureaucratic red tape. If the policies and procedures are overly complex, time consuming, or expensive, public outcry and resistance is sure to occur. Therefore, the following recommendations are intended to provide the minimum mechanisms necessary to guarantee increased compliance without imposing undue or unrealistic hardships upon the applicant.

Recommendations to Wetlands Boards to Enhance Compliance Efforts

Wetlands board compliance monitoring efforts vary widely between localities. As a result, some of the following recommendations will not be applicable to all boards. In fact, many of the recommendations were developed from existing wetlands board policies which have proven to be effective. The majority of the recommendations are designed to assist boards in developing an acceptable compliance monitoring program if they don't currently have one. They may also provide suggestions for improvement in those boards with existing compliance procedures.

We acknowledge that numerous localities are already financially constrained and as such may not have the additional funds or personnel necessary to dedicate to an expansion of their wetlands programs. These recommendations were developed with that in mind. Most can be effectively implemented without additional manpower. In fact, once underway, an active compliance monitoring program could actually streamline project reviews and reduce the number of time consuming violations and after-the-fact permit requests that a board now considers.

1. Require detailed drawings for all projects requiring a wetlands permit. At a minimum, all of the information contained in the Joint Permit Application drawing checklist should be included in the drawings. Some boards have taken this a step further and require professionally engineered drawings on all projects, while others require such P. E. stamped drawings only on commercial projects or large projects that surpass a certain threshold of impact. These requirements should be clearly established as wetland board policies. An application should <u>not</u> be considered complete until all the required information has been received.

2. Special attention should be given to requiring accurate benchmarks and reference points. Accurate distances from fixed reference points or benchmarks to each end and/or angle of the structure or impacted area should be required. A sample plan view drawing containing representative benchmarks is provided in Attachment 1. These distances should be carefully confirmed during the initial site visit since they will ultimately become the final indicators of permit compliance. If benchmarks prove impractical for a particular project, then a condition requiring that the alignment be staked and inspected prior to permit issuance should be imposed as conditions of approval. Some boards also require that the alignment of a bulkhead be inspected and approved after installation, but prior to backfilling, to reduce the environmental impacts and costs of restoration in the event it has been improperly constructed.

3. Take an adequate number of photographs or slides during the initial site visit to clearly document pre-construction site conditions. In addition to providing valuable reference material for public hearings, photographic documentation provides clear comparative evidence when determining permit compliance. If video equipment is available, it may prove to be another helpful tool. VCR tapes may even be less expensive and easier to archive in the long run. Photographic documentation is especially valuable if the project will require the grading of the adjacent upland.

4. Conduct routine post-construction inspections. Although this may involve additional man-hours, it is the only mechanism available to ensure permit compliance. If the required permit drawings and benchmarks are clear and accurate, the compliance checks can usually be conducted quickly, even by individuals unfamiliar with the project. Some localities might wish to utilize their existing local building or code compliance inspectors to check wetland board permit compliance during their other regular duties. If a post-construction inspection policy is adopted by the board, the inspectors should utilize a compliance inspection worksheet similar

to the one developed by VMRC. This form may be found as Attachment 2. The worksheet will help to ensure that all the necessary information is gathered during the inspection and will provide a quick reference in the event questions regarding the project arise later. Additionally, the worksheet information should be provided to VMRC for incorporation into the compliance data base. The data base will provide a valuable source of information on compliance and the overall effectiveness of individual wetlands boards.

5. Utilize only enforceable permit conditions and avoid nebulous statements such as "approximately" and "as close to the bank as possible." Instead, the board should negotiate a specific maximum encroachment, length, or amount of impacts should modifications become necessary to satisfy any concerns. If modifications or revisions are agreed to during the public hearing, revised drawings which accurately reflect the modification, including revised benchmark distances, should be required prior to permit issuance.

6. Develop a wetland board placard to be posted by the permittee at all permitted project sites during construction. The placard can serve to aid inspectors and concerned citizens when a project is under construction and problems or questions arise. The placard would provide the name and permit number, making identification and inspection of the project easier. If the locality already requires building permits for all wetland projects, they may wish to avoid duplication and just add the wetland permit number to the placard for easy identification. A sample placard that was developed for VMRC is provided as Attachment 3.

7. Performance bonds can be utilized to provide a financial incentive to comply with wetlands permits. Some boards currently require all permittees to post a performance bond. That bond is not released until a post-construction inspection has determined that the project was constructed in conformance with the permit document. Some boards may determine that bonds are not appropriate for all projects due to low permit activity or the fact that additional man-hours are required to process the bonds.

Bonds are a compliance mechanism that are already provided for in the wetlands law. They are routinely used effectively by a few boards to ensure compliance. The bonds are typically set high enough to provide sufficient funds to undertake restoration in the event of noncompliance. Bonds also provide an additional mechanism for ascertaining when the permitted construction has been completed, since the permittee will typically call for a compliance inspection soon thereafter in order to have his bond released. Whether or not the board develops a performance bond policy for all projects, performance bonds should be considered as a valuable tool to ensure compliance on projects of special concern.

Recommendations VMRC Should Consider to Enhance Compliance Efforts

Virginia state agencies are also currently operating within strict fiscal constraints. In addition, all agencies continue to explore ways to streamline the permitting process. As a result, it is especially important that any new compliance enhancement policies not result in additional burdens on VMRC's financial resources nor result in unnecessary additional requirements imposed on the applicant. The following recommendations are made with this in mind and are typically policy and procedural type changes rather than an imposition of new requirements on the applicant. Many of the recommendations for VMRC are similar to those noted for wetlands boards.

1. Require detailed drawings for all projects requiring a VMRC permit. Staff engineers should utilize the drawings checklist found in the Joint Permit Application in their initial review of each application to determine completeness. Areas where insufficient data was provided should be conveyed to the applicant with the acknowledgement letter. Incomplete applications should not be processed. If adherence to this policy fails to provide the anticipated results, the Commission may wish to consider adopting a regulation that requires professionally engineered drawings be submitted on all commercial projects, or for projects exceeding a certain threshold of impact or value. In the event an engineer can clearly determine from the available information that a VMRC permit will not be required, additional information to satisfy this policy would not be necessary.

2. Accurate benchmarks or reference points should be required on the plan view drawing(s) of all projects requiring VMRC authorization. Accurate distances from the benchmark to each end, and angle of the structure or impacted area should be mandatory. These distances should be routinely checked during the initial site visit. If benchmarks are impractical for a certain project, it may be necessary to have the applicant stake the impacted area. If staking is utilized, the engineer should take an adequate number of slides to accurately document the proposed alignment. This may well be the case for dredging proposals.

3. Engineers should take an adequate number of slides during the initial site visit to clearly illustrate pre-construction site conditions. Photographs provide a valuable source of information when reviewing constructed projects for compliance. They are especially valuable when a great deal of time has elapsed since the initial site visit and in those cases where the engineer who originally reviewed the project is no longer available to assist.

Although slides have been used almost exclusively in the past for photographic documentation, it may be useful to utilize video tape for certain types of projects. If video taping is used more frequently, it may be necessary to develop a method to archive the tapes for easy access and retrieval.

4. Engineers should conduct post-construction inspections at all sites permitted by VMRC. The post-construction inspection form found in Attachment 2 should be utilized to ensure that all necessary information is gathered during the visit.

The Commission should consider expanding their existing Memorandum of Agreement with the Department of Game and Inland Fisheries to include the use of VDGIF personnel to conduct the post-construction inspections in the western portion of the State.

Dredging projects should be evaluated by boat. Soundings should be taken to ascertain compliance. Dredging inspections should be conducted as soon after completion as practical to minimize the likelihood that additional impacts from non-dredging related factors could obscure or cloud the dredged dimensions of the area. If available, a chart recorder or a precise recording fathometer would be especially valuable to document the inspection.

In order to receive notification of the completion of permitted activities, VMRC should consider re-instituting the former postcard notification procedure. Should the permittees fail to regularly return the postcards upon completion, which was often the case in the past, the Commission might have to resort to bonding or some other form of deposit. This bond would not be released until after a post-construction inspection had confirmed permit compliance. It might be necessary to seek legislative authorization if the Commission is to require bonds for permits issued under Section 62.1-3.

5. Data collected from the post-construction inspections should be incorporated into the Habitat Management Division's existing computer tracking system. This would provide an easy method to identify projects which have yet to be inspected, as well as, provide the next logical step in permit tracking. Used in conjunction with the existing project description tracking data, the new data would allow examination of compliance by such attributes as, project type, locality, contractor and agent involved. It would also provide important data on the number of projects which actually get completed. This information would provide an additional valuable tool for monitoring compliance and identifying potential shortcomings in the regulatory program.

VMRC should strongly encourage local wetlands boards to conduct routine post-construction inspections utilizing the compliance worksheet and provide the results of the inspections to VMRC for incorporation into the compliance tracking data base. Projects in localities which opt not to conduct routine post-construction inspections should be inspected by VMRC personnel, if necessary, to obtain the compliance data.

Literature Cited

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Hershner, Carl, Thomas A. Barnard, Jr., and N. Bartlett Theberge. 1985. Analysis of Virginia's local wetlands boards. Pgs. 537-543 in Magoon, Orville T., Hugh Converse, Dallas Minor, Delores Clark and L. Thomas Tobin, eds. Coastal Zone '85. Proceedings of the Fourth Symposium on Coastal and Ocean Management. American Society of Civil Engineers. New York. 2672p.

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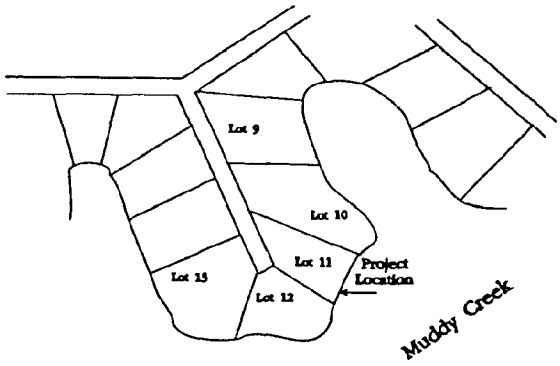
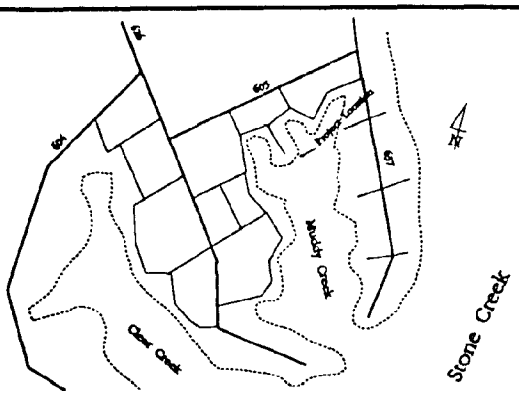
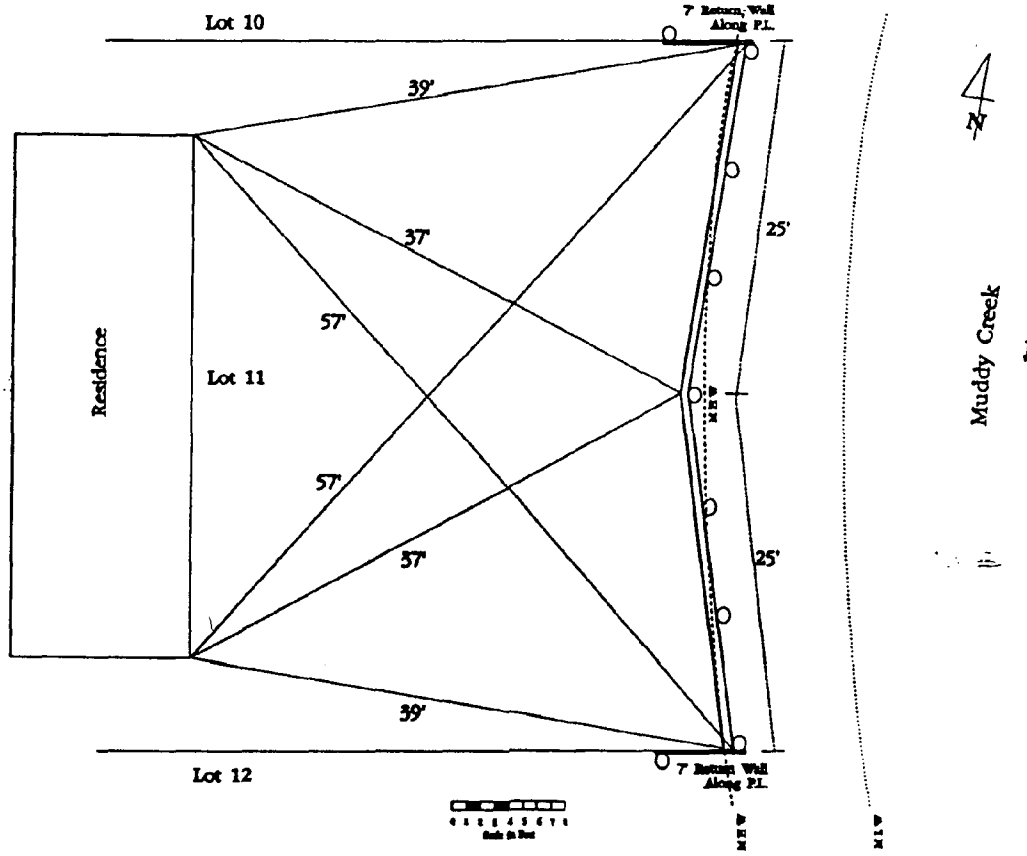
Attachment 1



Site Map



Vicinity Map



Datum: MLW Adjacent Property Owners 1. Lot 10, C.B. Parks 2. Lot 12, M.E. Lank	**Plan View** John G. Doe P.O. Box 123 Tidewater, Va 22222	County of: Northumberland Sheet 1 of 1 Date: August 3, 1991

Attachment 2

PROJECT COMPLIANCE ASSESSMENT

VMRC # _____
ENGINEER _____
SITE VISIT _____
DATE/TIME _____
OTHERS PRESENT _____

1. Permitee _____

2. Location (Waterway) _____
   (City/County) _____

3. Project Description _____

4. Project Completed? Yes____ No____

5. Date of Permit Expiration (VMRC) _____
   (LWB) _____

6. Project Dimensions as Permitted _____
   _____
   _____

7. Project Dimensions as Constructed _____
   _____
   _____

8. Can Permit Compliance be Determined? _____ If no, explain.
   _____
   _____

9. Degree of Compliance: In Compliance Moderate Out of Compliance

10. Additional Comments _____
    _____
    _____

Attachment 3

Permit # _____

Commonwealth of Virginia
Marine Resources Commission
Authorization

A Permit has been issued to: _____
(Name)

_____
(Address)

_____

The Permit Authorizes : _____

_____

_____

_____.

Issuance Date _____, Expiration Date _____.

_____
(Commissioner or Designee)

_____
(Notary Public)

_____
(Commission Expires)

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