

Merrill, Hannah

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Sent: Thursday, June 14, 2012 11:14 AM
To: zSMP; Miller, Sheila Roark; Steve Gray; McEntire, Jim; Chapman, Mike
Cc: connie beauvias; Karl Spees; Lois Perry; Keith Olson; Frank M Penwell;
[REDACTED] robert crittendend; Sandy Rains; harry bell; Jay Petersen; mary pierce pfaff; Sue Forde; pat tenhulzen; randy simmins; **Judy Miller**; Vi; Don; marv chastain
Subject: DOE SMP Local Wetland SETBACKS?

TO WHOM IT MAY CONCERN

This is my DOE SMP comment on wetlands
Pearl Rains Hewett
Member DOE SMP Advisory Committee

Clallam County **private property owners** are promised a **FUTURE wetland inventory** by WA State DOE?

Wetlands are not mapped on the Clallam County DOE SMP Update.

Grays Harbor Commissioners just settled a 2010 legal battle with **FUTUREWISE, the commissioners just caved in, rolled over on their backs and set 150 foot wetland setbacks on ALL private property.**

Clallam County has been in a **legal battle with FUTUREWISE** for seven years (plus or minus) about Carlsborg.

How will Clallam County elected officials respond, if? when? **FUTUREWISE challenges our county CAO wetland setbacks?**

How badly would Clallam County private property owners be affected with 150 foot WETLAND setbacks?

If all wetlands 0.1 acre (66 by 66 feet) or greater were field mapped? (See below)

On line I found an example of

Lowell OREGON Local Wetland Inventory Report DRAFT

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January 2011

Wetland determinations were made for all wetlands based on either on-site or off-site investigations, depending on access permission.

Where property access was granted, all wetlands 0.1 acre (66 by 66 feet) or greater were field mapped.

Off-site determinations were made for parcels

***without access permission** and were typically accomplished by observing site characteristics from adjacent rights-of-way (e.g. public streets or sidewalks). In some cases,*

this was done with the aid of binoculars. Field observations of hydrology and vegetation were assessed in combination with existing data such as **published soil survey data,** NWI maps and/or known DSL delineations, landscape setting, and staff experience. Field observations for off-site **determinations are presented on DSL data sheets even though no sample plot was established on the parcel.**

For parcels that were not visible from rights-of-way,

determinations were made by analysis of current aerial photographs and other existing data compiled for the LWI as well as the biologist's experience with similar conditions.

3.3 Wetland Determinations

Wetlands are those areas that are inundated or saturated by surface water or groundwater at a frequency or duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Both on-site and off-site methods of the LWI are geared towards determining if a site contains wetland soils, hydrology, and vegetation. Wetlands determinations used were classified according to the classification of wetlands as defined by plants, soils and the frequency of flooding know as the "Cowardin system" (see Appendix G). **Wetland determinations were made for all wetlands based on either on-site or off-site investigations, depending on access permission.**

3.3.1 On-site Determinations

For parcels with access permission, on-site determinations were made according to the US Army Corps of Engineers (Corps) 1987 Manual (Environmental Laboratory, 1987), and the Western Mountains, Valleys, and Coast Regional Supplement to the manual (Corps, 2010).

Determinations were made on parcels that were judged to have wetlands or probable wetlands based on preliminary mapping and research efforts. Wetlands were determined to be present by documenting hydrophytic vegetation, hydric soils, and wetland hydrology. **Where property access was granted, all wetlands 0.1 acre (66 by 66 feet) or greater were field mapped.** (This differs from the LWI rule, which states all wetlands greater than or equal to 0.5 acre must be mapped.). Sample plots were established to document typical vegetation, soil, and hydrology characteristics and to help determine the approximate location of the wetland boundary.

3.3.2 Off-site Determinations

Off-site determinations were made for parcels without access permission and were typically accomplished by observing site characteristics from adjacent rights-of-way (e.g. public streets or sidewalks). In some cases, this was done with the aid of binoculars. Field observations of hydrology and vegetation were assessed in combination with existing data such as published soil survey data, NWI maps and/or known DSL delineations, landscape setting, and staff experience. Field observations for off-site determinations are presented on DSL data sheets even though no sample plot was established on the parcel. For parcels that were not visible from rights-of-way, determinations were made by analysis of current aerial photographs and other existing data compiled for the LWI as well as the biologist's experience with similar conditions.

3.4 Field Mapping and Data Collection

All field data were collected and recorded using Trimble Yuma, Global Positioning System/Geographic Information System (GPS/GIS) data recorders. Aerial imagery and shapefiles of the study area were loaded onto the units for reference in the field. The GPS/GIS

units enabled field crews to digitize wetland boundaries in ArcPad; edit existing wetland boundaries as necessary; map probable wetlands, artificial wetlands, and locations of sample plots; and map streams. Other information recorded on the GPS/GIS units includes field notes

and wetland delineation/determination data on digital data sheets. After the field work, data were uploaded onto a desktop computer for viewing and final editing.

3.4.1 Wetland Mapping

Wetland boundaries were mapped per Oregon Administrative Rules (OAR) with **an accuracy target of 16.4 feet on sites with access permission** (OAR 141-086-0210). Wetlands were coded sequentially with unique numbers, generally from north to south in the study area. Newly coded wetlands that extend beyond the study area boundary were digitized to reflect only the area within the study limits.

Wetlands on file with DSL became part of the LWI and are identified with their existing delineation/determination number such as WD 2008-0485. In many cases, multiple wetlands were delineated at one time and have the same DSL file number. To create unique codes for each wetland for the OFWAM assessment, the delineation number was used in combination with a unique number such as WD 2008-0485-1, -2. These unique numbers allowed each wetland to be assessed separately, if necessary, for the OFWAM assessment.

Each DSL wetland delineation within the study area was field verified and edited if the current size was different from the recorded size. Previously delineated or determined DSL wetland polygons extending beyond the study area with no size change were left as is. If a DSL wetland no longer existed, it was deleted from the wetland polygon layer.

If a wetland was bisected by a road or other feature but had a hydrologic connection with other sections of wetland, the wetland numeric code was given a letter, such as 8a, 8b to indicate that both polygons were part of the same assessment unit for OFWAM. **If a wetland contained more than one Cowardin class of 0.25 acre or more, another polygon was drawn to represent this on a**

map. .

3.4.2 Sample Plots and Wetland Points

Sample plots, "SP #," were established for each wetland and for areas with wetland characteristics. A minimum of one sample plot was established per wetland. Sample plots were not established for wetlands on file with DSL. Refer to Appendix E for sample plot data.

Wetlands with an estimated total area of 1/10 acre or less within the study area were digitized as a point and recorded as a "PW" or probable wetland. In some cases, a PW represents a small portion of a larger wetland that is located outside of the study area.