

From: [Short, Jaime \(ECY\)](#)
To: [Moore, David \(ECY\)](#); [Karen Scharer](#)
Subject: FW: Dayton SMP for publication
Date: Friday, April 17, 2015 9:20:26 AM
Attachments: [Draft Dayton SMP 2015-03-31 Published.docx](#)

Thank you for the thorough review, Dave!

Karen,

As you'll see below, Dave had a few comments/questions for the wetlands section of your draft SMP. Feel free to give us a call if you need additional clarification. You have my info and Dave's number is 509-329-3474. Have a nice weekend! - Jaime

From: Moore, David (ECY)
Sent: Thursday, April 16, 2015 2:29 PM
To: Short, Jaime (ECY)
Subject: RE: Dayton SMP for publication

Hi Jaime,

I have a few comments and changes in the attached file. I see that the CAO is incorporated by reference for wetlands and other sensitive areas. I think that's OK considering there likely are few associated wetlands in city limits but there should still be something about how wetlands are identified similar to what I saw in the Adams SMP provided below (starts after dashed line).

I pointed out a few instances where some terms used in the document, such as "qualified professional" and "creation" were not defined and I think they should be. On the definition of a qualified professional, I'm wondering if it's also possible to add in language similar to what the Spokane CAO has for a qualified biologist and a qualified wetland specialist:

Qualified Biologist: The holder of a B.S. or B.A. or equivalent degree in biology, environmental studies, fisheries, geomorphology, or related field, from an accredited university, and at least two years of field and/or laboratory experience in evaluation of land use impacts on fish and wildlife species and their habitats, with evidence of peer-reviewed publications or other related professional literature.

Qualified Wetland Specialist: A holder of a Society of Wetland Scientists (SWS) certification or has the equivalent in academic qualifications and field experience for making competent wetland delineation's, reports, and recommendations necessary to implement the provisions of this ordinance.

I also had a comment about defining unauthorized vegetation removal and procedures for replacement. If you have any questions, give me a shout over the wall.

Wetland Identification and Rating.

1. Identification of wetlands and delineation of their boundaries pursuant to this Section shall be done in accordance with the approved federal wetland delineation manual and applicable regional supplements. All areas within shoreline jurisdiction meeting the wetland designation criteria in that procedure are hereby designated critical areas and are subject to the provisions of this Section. Wetland delineations are valid for five years; after such date the City, in consultation with Ecology, shall determine whether a revision or additional

assessment is necessary.

2. Rating. Wetlands shall be rated according to the Washington Department of Ecology wetland rating system, as set forth in the *Washington State Wetland Rating System for Eastern Washington* (Ecology Publication #14-06-030, or as revised and approved by Ecology), which contains the definitions and methods for determining whether the criteria below are met.
 - a. Category I wetlands are those that 1) represent a unique or rare wetland type; or 2) are more sensitive to disturbance than most wetlands; or 3) are relatively undisturbed and contain ecological attributes that are impossible to replace within a human lifetime; or 4) provide a high level of functions. Risk of any degradation to these wetlands must be avoided because their functions and values are too difficult to replace. Generally, these wetlands are not common and make up a small percentage of the wetlands in the region.
 - b. Category II wetlands are difficult, though not impossible, to replace, and provide high levels of some functions. These wetlands occur more commonly than Category I wetlands, but still need a relatively high level of protection.
 - c. Category III wetlands are wetlands with a moderate level of functions and can often be adequately replaced with a well-planned mitigation project. These wetlands generally have been disturbed in some ways and are often less diverse or more isolated from other natural resources in the landscape than Category II wetlands.
 - d. Category IV wetlands have the lowest level of functions and are often heavily disturbed. These are wetlands that should be able to be replaced and, in some cases, improved. However, experience has shown that replacement cannot be guaranteed in any specific case. These wetlands may provide some important functions and also need to be protected.
3. Illegal modifications. Wetland rating categories shall not change due to illegal modifications made by the applicant or with the applicant's knowledge.