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**SAWTOOTH  
ENVIRONMENTAL  
CONSULTING, LLC**

# Memo

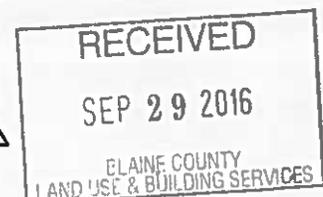
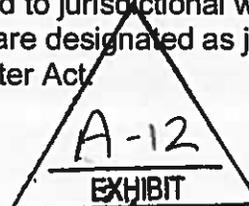
**To:** Kathy Grotto – Blaine County Land Use and Building Services  
**Cc:** Preston Ziegler – Three Creeks Subdivision  
Kimberlee Johnson – Galena Engineering, Inc.  
**From:** Trent Stumph – Sawtooth Environmental Consulting, LLC  
**Date:** September 29, 2016  
**Re:** Three Creeks Subdivision Mary Lane Roadway- Jurisdictional  
Determination Wetland Evaluation

September 28, 2016 Sawtooth Environmental Consulting, LLC (SEC), conducted a jurisdictional determination wetland evaluation for the subject project area, centered on the section line between the NE ¼, NE ¼, Section 35 and the NW ¼, NW 1/4, Section 36, Township 2 North, Range 17 East. B.M., Blaine County, Idaho. Proposed project application within the identified project area includes the Mary Lane access roadway associated with the Three Creeks Crossing Subdivision.

Total area for the identified project area is approximately 0.50 +/- ac., (22,500 sq. ft.) and is specific to an area where the proposed roadway crosses a low-land swale, which was identified as wetlands per 2004 survey by American Water Resources. Blaine County Land Use and Building Services as part of the preliminary plat application for the proposed Three Creeks Crossing Subdivision are reviewing the Mary Lane access roadway project application.

The purpose of the jurisdictional determination wetland evaluation was to evaluate the identified project area and verify the presence or absence of potential jurisdictional wetlands, which are given federal protection under Section 404 of the federal Clean Water Act (CWA). Section 404 of the CWA, provides the regulatory authority of the U.S. Army Corps of Engineers (USACE) over activities that involve the discharge of dredge/fill material into waters of the U.S. The USACE has the authority to approve all jurisdictional determinations and issue relevant permits for activities that involve the discharge of dredge/fill material into waters of the United States. Other Federal, State and local regulations may also have bearing on such activities.

Waters of the United States includes most perennial and intermittent streams, wetlands, natural and man-made lakes and ponds, as well as irrigation and drainage canals and ditches which flow year-round or have continuous flow at least seasonally (e.g. typically three months) and are connected to jurisdictional waters. The Big Wood River, its tributaries and associated wetlands are designated as jurisdictional resources under Section 404 of the Clean Water Act.



Wetlands are "those areas that are inundated or saturated with surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3[b]). Jurisdictional wetlands are "wetlands which are within the extent of the Corps of Engineers regulatory overview" (33 CFR 328.1 and 2). To be determined as a jurisdictional wetland, an area must exhibit positive indicators of wetland hydrology, wetland vegetation and hydric soils. Those areas that do not meet the three-wetland parameters are either uplands or non-jurisdictional wetlands (Environmental Laboratory 1987).

The scope and intent of this jurisdictional determination wetland evaluation is to describe the findings of the investigation and identify any potential jurisdictional wetlands located within the defined project area. The jurisdictional determination may be used to assist in the planning and design of the proposed Mary Lane access roadway within the defined project area and help ensure that impacts to jurisdictional resources are avoided and/or minimized.

September 28, 2016, a reconnaissance level field investigation was performed to characterize the site and to confirm the presence or absence of wetlands within the defined project area. The investigation involved an on the ground survey throughout the project area to determine the range of conditions present.

The Routine On-site Method, as referenced in the 1987 Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory 1987), including protocol methods outlined in the Army Corps Interim Regional Supplement for Western Mountains, Valleys, and Coast Region, were used to investigate the occurrence and distribution of 'Waters of the United States' within the parcel. All relevant environmental information was utilized to further the jurisdictional determination wetland analysis. Information included topographical maps and aerial images from the United States Geological Services (USGS), Blaine County GIS Map Services, the National Wetland Inventory Map (NWI) and the Three Creeks Crossing Subdivision Preliminary Plat Map (Galena Engineering, August 2016).

The subject parcel is located approximately 5.0 miles west of Hailey Idaho and is positioned in the foot hill transition zone of the Croy Creek drainage. A majority of the parcel has been significantly altered by past land-use applications, primarily agricultural practices that have altered site topography and removed pre-existing vegetation communities. At present the property is managed for irrigated and non-irrigated alfalfa hay production.

The subject project area is comprised mostly of irrigated alfalfa cropland and includes a small drainage swale. On-site observations suggest the identified drainage swale does convey surface waters, west to east, for limited time periods during snowmelt runoff periods and probably during significant storm events. At its terminus the swale connects with the Croy Creek channel located immediately to the east.



Vegetation associated with the project area is sparse throughout the site and predominantly consists of Alfalfa (*Medicago sativa*). Vegetation within and adjacent to the swale is dominated by facultative (FAC) and facultative upland (FACU) plant species, dominant species include: Mules Ear (*Wyethia amplexicaulis*), Timothy grass (*Phleum pratense*), Fowl bluegrass (*Poa palustris*), Smooth brome (*Bromus inermis*), Sheep fescue (*Festuca ovina*), Prickly lettuce (*Lactuca scariola*) and common yarrow (*Achillea millefolium*). Observations did not record any plant species with obligate or facultative wetland indicator status, something you would expect to find if the area supported wetland characteristics.

Characteristics for the soils associated with the project area are consistent with the soil types and characteristics defined by the USDA Soil Map Unit for Blaine County Idaho (USDA 1991). One primary mapped soil unit is identified for the subject project area, the identified map unit and soil type description is listed below:

72 Marshdale-Bruneel loams, ( 0 to 2 percent slopes): Marshdale-Bruneel loams consist of poorly drained soils that occur within floodplains and along drainageways. The soils are generally very deep with moderate permeability. Contrasting inclusions include Little Wood gravelly loam on stream terraces (10 percent); Bruneel gravelly loam (5 percent); Riverwash (5 percent).

On-site soil observations made during the investigation confirmed the mapped soil types and revealed similar soil characteristics as described in the soil survey. Soil characteristics associated with the swale consisted of a gravelly loam from the soil surface to a depth greater than 16 inches and match the soil profile for Little Wood Gravelly loam soils. The Little Wood gravelly loam soils are listed as a contrasting inclusion for Marshdale Bruneel loams, which occur on stream terraces.

Soils associated with the subject drainage swale within the project area were designated as non-hydric soils do to characteristics associated with well drained soils and the lack of hydric soil characteristics within the first 14" of the soil profile.

Positive indicators for wetland hydrology were not observed within the identified project area. Though it is apparent the drainage swale does convey surface water runoff occasionally throughout the year, observed hydrology indicators suggest the timing, duration and frequency of wet conditions are not sufficient enough to support wetland characteristics.

The lack of physical characteristic associated with the swale; bed/bank/scour elements and a defined ordinary high water mark, along with the lack of wetland vegetation and hydric soil indicators provided the evidence that episodes of inundation or soil saturation are not sufficient enough to support wetlands.

Data recorded for the site is presented in Appendix A of this report. The data form summarizes the existing characteristics of the site and outlines the decision-making process used to conclude the non-wetland status for the site.

As represented by the applicant's preliminary plat map (Figure 1), and based on the information gathered during the site evaluation regarding position on landscape, vegetation, soils and hydrology, and best professional assessment of the investigator support the findings that there are **no jurisdictional wetlands**, within the identified project area.

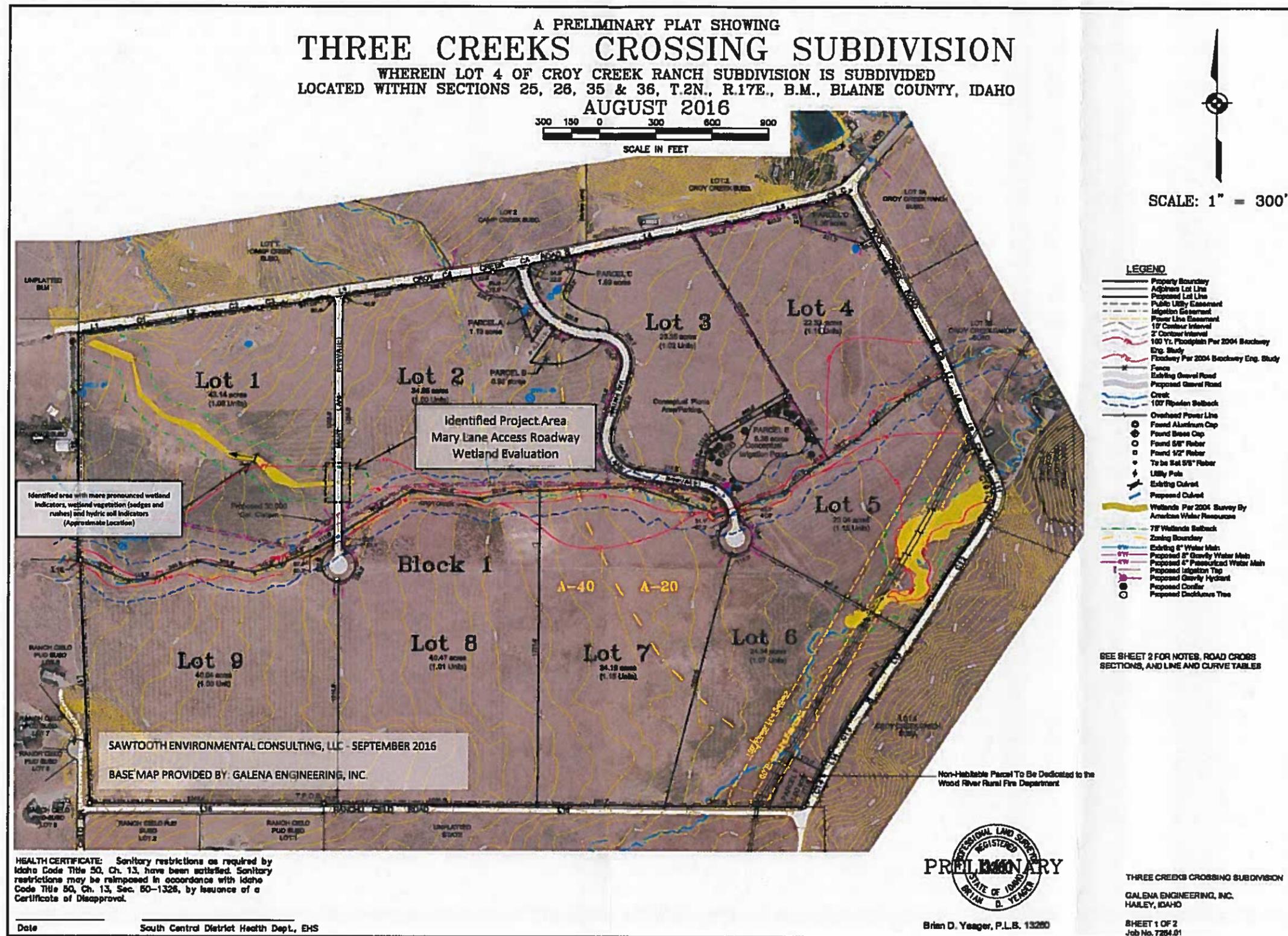
Proposed site development applications should incorporate all applicable Best Management Practices (BMP's) to protect resource values and to ensure compliance with state and federal Water Quality Standards as they may relate to the identified drainage swale. Proposed development applications should work to minimize impacts to the greatest extent practicable.

Please don't hesitate to call me if you have any questions or if I can be of any further assistance.

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FIGURE 1  
 Three Creeks Subdivision - Mary Lane Roadway  
 Jurisdictional Determination Wetland Evaluation



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Three Creeks Subdivision - Mary Lane Roadway  
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PHOTO EXHIBIT



Photo 1: Three Creeks Crossing Mary Lane project site, site characteristics associated with sample point (09/28/16).

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Three Creeks Subdivision - Mary Lane Roadway  
Jurisdictional Determination Wetland Evaluation

PHOTO EXHIBIT

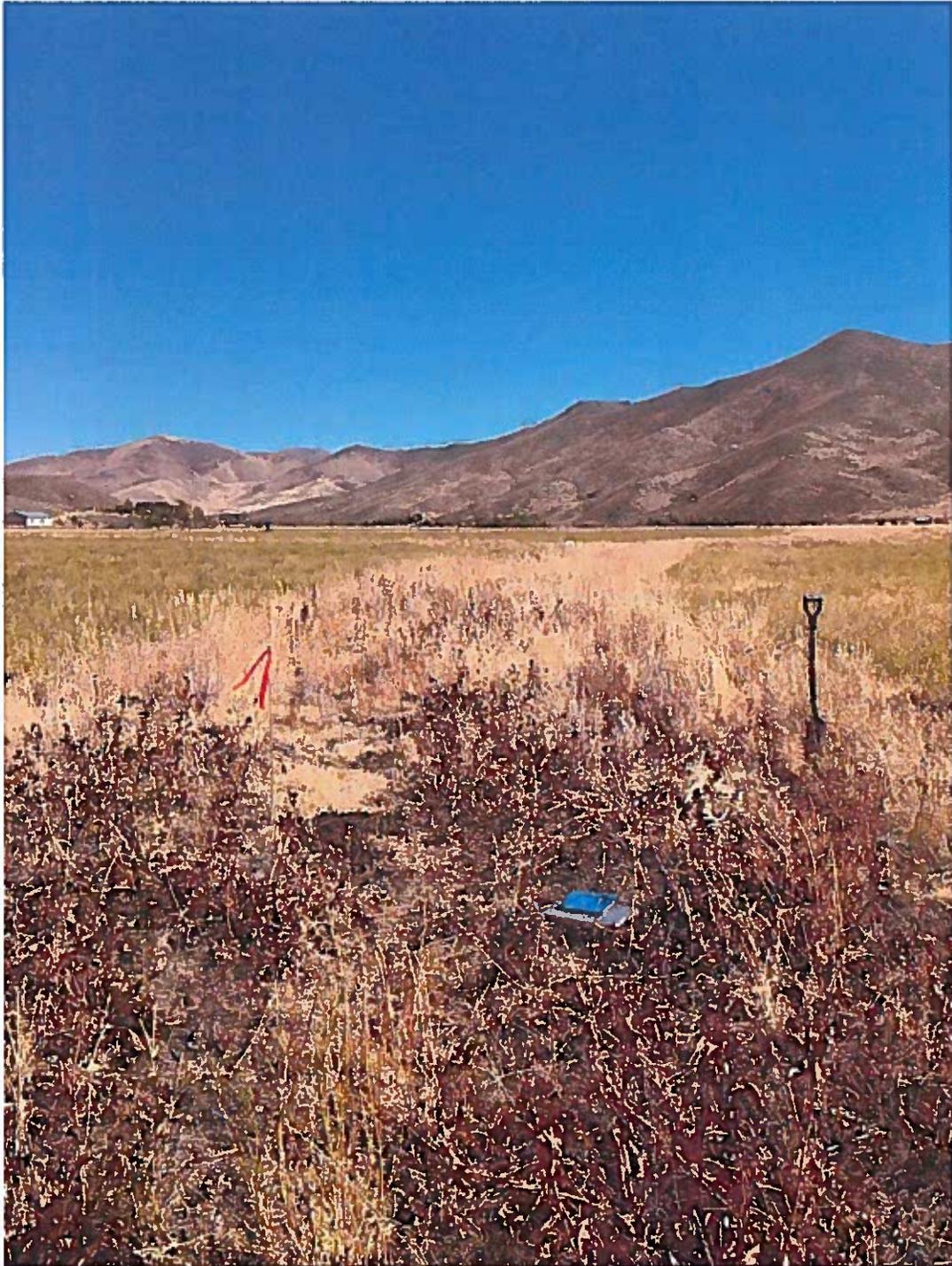


Photo 2: Three Creeks Crossing Mary Lane project site, looking east (09/28/16).

Three Creeks Subdivision - Mary Lane Roadway  
Jurisdictional Determination Wetland Evaluation

PHOTO EXHIBIT

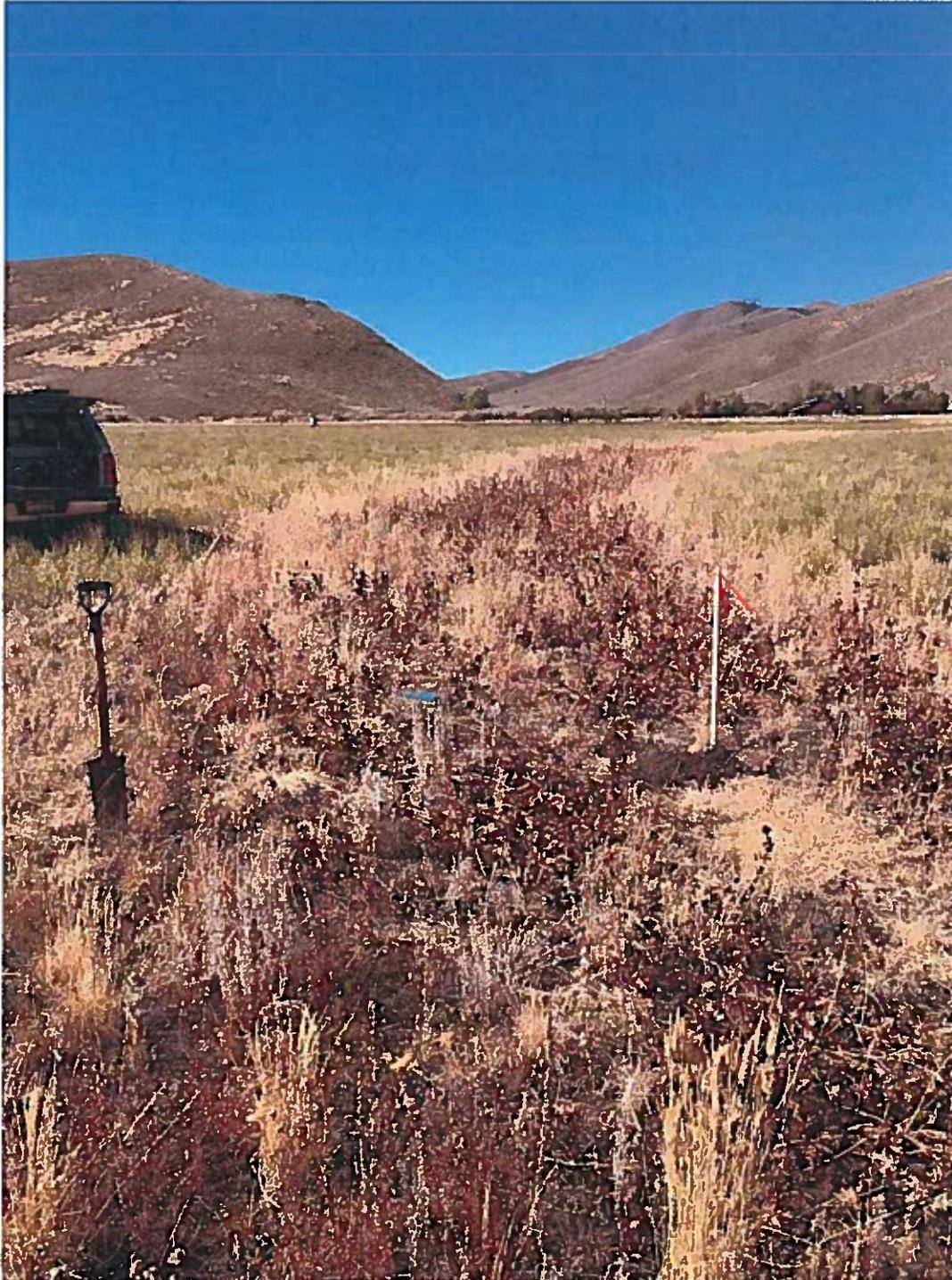


Photo 3: Three Creeks Crossing Mary Lane project site, looking west (09/28/16).

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**APPENDIX A**

**WETLAND DATA FORMS**

**WETLAND DETERMINATION DATA FORM - Arid West Region**

Project/Site: Three Creeks Crossing - Mary Lane Access Road City/County: Blaine County Sampling Date: 09/28/2016  
 Applicant/Owner: Three Creeks Crossing Subdivision State: ID Sampling Point: SP-1  
 Investigator(s): SEC - T. Stumph Section, Township, Range: Section 35 36, T.2N., R.17E.  
 Landform (hillslope, terrace, etc.): Floodplain Terrace Local relief (concave, convex, none): none Slope (%): < 1.0%  
 Subregion (LRR): B - Columbia/Snake River Plateau Lat: 43° 28' 4.20"N Long: 114° 23' 12.45"W Datum: NAD83  
 Soil Map Unit Name: MU#72 Marshdale - Bruneel loam NWI classification: Non-Wetland

Are climatic / hydrologic conditions on the site typical for this time of year? Yes  No  (If no, explain in Remarks.)  
 Are Vegetation  Soil  or Hydrology  significantly disturbed? Are "Normal Circumstances" present? Yes  No   
 Are Vegetation  Soil  or Hydrology  naturally problematic? (If needed, explain any answers in Remarks.)

**SUMMARY OF FINDINGS - Attach site map showing sampling point locations, transects, important features, etc.**

Hydrophytic Vegetation Present?	Yes <input checked="" type="radio"/>	No <input type="radio"/>	Is the Sampled Area within a Wetland? Yes <input type="radio"/> No <input checked="" type="radio"/>
Hydric Soil Present?	Yes <input checked="" type="radio"/>	No <input type="radio"/>	
Wetland Hydrology Present?	Yes <input checked="" type="radio"/>	No <input type="radio"/>	
Remarks: Designated non-wetland plot: Position on landscape and lack of positive wetland indicators (vegetation, soils and hydrology) present at time of field investigation.			

**VEGETATION**

Tree Stratum (Use scientific names.)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet:	
1. _____				Number of Dominant Species That Are OBL, FACW, or FAC: <u>3</u> (A)	
2. _____				Total Number of Dominant Species Across All Strata: <u>9</u> (B)	
3. _____				Percent of Dominant Species That Are OBL, FACW, or FAC: <u>33.3 %</u> (A/B)	
4. _____					
Total Cover: _____ %					
Sapling/Shrub Stratum				Prevalence Index worksheet:	
1. <u>ARCA - Silver sage</u>	<u>5</u>	<u>Yes</u>	<u>FACU</u>	Total % Cover of: _____ Multiply by:	
2. _____				OBL species	x 1 = <u>0</u>
3. _____				FACW species	x 2 = <u>0</u>
4. _____				FAC species	<u>45</u> x 3 = <u>135</u>
5. _____				FACU species	<u>25</u> x 4 = <u>100</u>
Total Cover: <u>5 %</u>				UPL species	<u>5</u> x 5 = <u>25</u>
				Column Totals:	<u>75</u> (A) <u>260</u> (B)
				Prevalence Index = B/A = <u>3.47</u>	
Herb Stratum				Hydrophytic Vegetation Indicators:	
1. <u>WYAM - Mules ear</u>	<u>20</u>	<u>Yes</u>	<u>FAC</u>	<input checked="" type="checkbox"/> Dominance Test is >50%	
2. <u>POPA - Fowl bluegrass</u>	<u>15</u>	<u>Yes</u>	<u>FAC</u>	<input checked="" type="checkbox"/> Prevalence Index is ≤3.0'	
3. <u>PHAR - Timothy grass</u>	<u>10</u>	<u>Yes</u>	<u>FAC*</u>	<input type="checkbox"/> Morphological Adaptations <sup>1</sup> (Provide supporting data in Remarks or on a separate sheet)	
4. <u>BRIN - Smooth brome</u>	<u>5</u>	<u>Yes</u>	<u>FACU</u>	<input type="checkbox"/> Problematic Hydrophytic Vegetation <sup>1</sup> (Explain)	
5. <u>FEOV - Sheep fescue</u>	<u>5</u>	<u>Yes</u>	<u>FACU</u>		
6. <u>LASE - Prickly lettuce</u>	<u>5</u>	<u>Yes</u>	<u>FACU</u>		
7. <u>ACMI - common yarrow</u>	<u>5</u>	<u>Yes</u>	<u>FACU</u>		
8. <u>MESA - Alfalfa</u>	<u>5</u>	<u>Yes</u>	<u>UPL</u>		
Total Cover: <u>70 %</u>				<sup>1</sup> Indicators of hydric soil and wetland hydrology must be present.	
Woody Vine Stratum				Hydrophytic Vegetation Present?	
1. _____				Yes <input type="radio"/> No <input checked="" type="radio"/>	
2. _____					
Total Cover: _____ %					
% Bare Ground in Herb Stratum <u>30 %</u>		% Cover of Biotic Crust _____ %			

Remarks: Non-wetland plant community present. Drainage swale bisecting agricultural cropland (alfalfa hay).

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**SOIL**

Sampling Point: SP-1

**Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)**

Depth (inches)	Matrix		Redox Features				Texture <sup>3</sup>	Remarks
	Color (moist)	%	Color (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>		
0 - 4"	10YR3/2						gravelly loam	10 - 15% gravel/pebble
4 - 16"	10YR3/2						gravelly loam	+25% gravel/pebble compos.

<sup>1</sup>Type: C=Concentration, D=Depletion, RM=Reduced Matrix. <sup>2</sup>Location: PL=Pore Lining, RC=Root Channel, M=Matrix.  
<sup>3</sup>Soil Textures: Clay, Silty Clay, Sandy Clay, Loam, Sandy Clay Loam, Sandy Loam, Clay Loam, Silty Clay Loam, Silt Loam, Silt, Loamy Sand, Sand.

<p><b>Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)</b></p> <input type="checkbox"/> Histosol (A1) <input type="checkbox"/> Histic Epipedon (A2) <input type="checkbox"/> Black Histic (A3) <input type="checkbox"/> Hydrogen Sulfide (A4) <input type="checkbox"/> Stratified Layers (A5) (LRR C) <input type="checkbox"/> 1 cm Muck (A9) (LRR D) <input type="checkbox"/> Depleted Below Dark Surface (A11) <input type="checkbox"/> Thick Dark Surface (A12) <input type="checkbox"/> Sandy Mucky Mineral (S1) <input type="checkbox"/> Sandy Gleyed Matrix (S4)	<input type="checkbox"/> Sandy Redox (S5) <input type="checkbox"/> Stripped Matrix (S6) <input type="checkbox"/> Loamy Mucky Mineral (F1) <input type="checkbox"/> Loamy Gleyed Matrix (F2) <input type="checkbox"/> Depleted Matrix (F3) <input type="checkbox"/> Redox Dark Surface (F6) <input type="checkbox"/> Depleted Dark Surface (F7) <input type="checkbox"/> Redox Depressions (F8) <input type="checkbox"/> Vernal Pools (F9)	<p><b>Indicators for Problematic Hydric Soils:</b></p> <input type="checkbox"/> 1 cm Muck (A9) (LRR C) <input type="checkbox"/> 2 cm Muck (A10) (LRR B) <input type="checkbox"/> Reduced Vertic (F18) <input type="checkbox"/> Red Parent Material (TF2) <input type="checkbox"/> Other (Explain in Remarks)
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<sup>4</sup>Indicators of hydrophytic vegetation and wetland hydrology must be present.

**Restrictive Layer (if present):**  
 Type: \_\_\_\_\_  
 Depth (inches): \_\_\_\_\_

**Hydric Soil Present?** Yes  No

**Remarks:**  
 Confirmed soil type: MU72 - Marshdale - Brunel loam with Little Wood Gravelly loam inclusion. Designated as a non-hydric soil, due to the lack of hydric soil indicators within the soil observation pit and lack of significant hydrology inputs.

**HYDROLOGY**

<p><b>Wetland Hydrology Indicators:</b></p> <p>Primary Indicators (any one indicator is sufficient)</p> <input type="checkbox"/> Surface Water (A1) <input type="checkbox"/> High Water Table (A2) <input type="checkbox"/> Saturation (A3) <input type="checkbox"/> Water Marks (B1) (Nonriverine) <input type="checkbox"/> Sediment Deposits (B2) (Nonriverine) <input type="checkbox"/> Drift Deposits (B3) (Nonriverine) <input type="checkbox"/> Surface Soil Cracks (B6) <input type="checkbox"/> Inundation Visible on Aerial Imagery (B7) <input type="checkbox"/> Water-Stained Leaves (B9)	<input type="checkbox"/> Salt Crust (B11) <input type="checkbox"/> Biotic Crust (B12) <input type="checkbox"/> Aquatic Invertebrates (B13) <input type="checkbox"/> Hydrogen Sulfide Odor (C1) <input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3) <input type="checkbox"/> Presence of Reduced Iron (C4) <input type="checkbox"/> Recent Iron Reduction in Plowed Soils (C6) <input type="checkbox"/> Other (Explain in Remarks)	<p><b>Secondary Indicators (2 or more required)</b></p> <input type="checkbox"/> Water Marks (B1) (Riverine) <input type="checkbox"/> Sediment Deposits (B2) (Riverine) <input type="checkbox"/> Drift Deposits (B3) (Riverine) <input checked="" type="checkbox"/> Drainage Patterns (B10) <input type="checkbox"/> Dry-Season Water Table (C2) <input type="checkbox"/> Thin Muck Surface (C7) <input type="checkbox"/> Crayfish Burrows (C8) <input type="checkbox"/> Saturation Visible on Aerial Imagery (C9) <input type="checkbox"/> Shallow Aquitard (D3) <input type="checkbox"/> FAC-Neutral Test (D5)
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**Field Observations:**

Surface Water Present?	Yes <input type="radio"/> No <input checked="" type="radio"/>	Depth (inches): _____
Water Table Present?	Yes <input type="radio"/> No <input checked="" type="radio"/>	Depth (inches): _____
Saturation Present? (Includes capillary fringe)	Yes <input type="radio"/> No <input checked="" type="radio"/>	Depth (inches): _____

**Wetland Hydrology Present?** Yes  No

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

**Remarks:**  
 No positive wetland hydrology indicators present at time of field investigation. Lack of physical characteristic associated with the swale; bed/bank/scour and ordinary high water mark, along with the lack of wetland vegetation and hydric soil indicators.