



Huntley Survey & Design, PLLC

New Hampshire & Vermont - Land Surveying * Wetlands Delineation & Permitting * Septic System Design

December 19, 2023

Planning Board
Town of Temple
423 Route 45, PO Box 191
Temple, NH 03084

RE: Pickman Subdivision – Abutter Wetland Concern

Dear Planning Board Members,

I was copied on an email from Heather Hannon on December 11, 2023 expressing her concerns that the wetlands were incorrectly depicted on the Pickman subdivision. The Planning Board Chair asked if I could go look at the site and give an opinion to the board in my capacity as a NH Certified Wetland Scientist.

I performed a site visit on December 12, 2023 with a full-size copy of the subdivision plan to review the wetland line as shown on the plan compared to what is on the ground. My focus was the wetland lines shown on lot 2B-37-1 surrounding the designated buildable area. I found all the wetland flags marking the delineation still in place, and I was able to follow and inspect that line.

Jurisdictional wetlands in New Hampshire consist of all surface waters and any adjacent wetland areas. Surface waters include *“all areas where freshwater flows or stands... including the portion of any bank or shore which borders such waters, and any swamp or bog subject to periodic flooding by fresh water.”*¹

State jurisdiction of wetlands comes from RSA 482-A Fill and Dredge in Wetlands and is described and regulated under Chapter Env-Wt. of the New Hampshire Code of Administrative Rules, *which adheres to the ACOE 1987 Wetland delineation manual*. Jurisdictional wetlands also fall under the review of the Army Corps of Engineers (ACOE) when certain impact thresholds are met.

The ACOE and EPA define wetlands as *“Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.”*

ACOE provides very specific directives for the delineation of wetlands. Jurisdictional wetlands are delineated using the guidance and techniques described in Technical Manual Y-87-1, The Corps of Engineers 1987 Wetland Delineation Manual and supplemented by the January 2012, Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region U.S. Army Corps of Engineers, v.2.

¹ RSA 482-A:4

The manuals utilize a three-parameter approach for delineating wetlands: the presence or absence of (a) hydric soils, (b) the dominance of hydrophytic vegetation, and (c) evidence of wetland hydrology (inundation or saturation to the soil surface for 12.5% of the growing season; about 17 consecutive days occurring between about May 4th to about September 20th) to determine whether or not an area is a jurisdictional wetland. All three parameters must be met for an area to be considered jurisdictional. Seasonal flooding and heavy precipitation events that appear to inundate an area for a shorter time do not meet the hydrology wetland criteria.

I reviewed the delineation that Jason Bolduc, NH CWS #320 & NH Soil Scientist #96 performed. I will not say that the line is correct, as it's not my place to challenge his work. Jason is a licensed professional under the jurisdiction of the NH Joint Board of Licensure and has stamped and signed the subdivision plan.

I will say that I would delineate the jurisdictional wetland line in the exact same place. I also agree with the location shown on the subdivision plan, in my capacity as a Wetland Scientist, a Licensed NH Land Surveyor and an Alternate Member of the Temple Planning Board. In my professional opinion, the lines shown on the plan correctly represent the actual wetlands as found on the ground.

Sincerely



Russell J. Huntley,
NHLLS 877
NH CWS 156

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