



**LARSON**

**AND ASSOCIATES**

*Land Surveyors & Engineers, Inc.*

**4401 South 66<sup>th</sup> Street  
Tacoma, Washington 98409  
(253) 474-3404 • Fax: (253) 472-7358**

RECEIVED

MAY 10 2012

HABITAT PROGRAM

May 2, 2012

Bob Zeigler  
SEPA Responsible Official  
Habitat Program  
Washington Department of Fish and Wildlife  
600 Capitol Way North  
Olympia, WA 98501-1091

Subject: Wilcox Farms NWS-2010-1151 SEPA

Mr. Zeigler:

Attached is the **SEPA** checklist that should have originally accompanied the JARPA application for the Wilcox Farms "Ditch cleaning and maintenance project". Also attached is the narrative letter to Gina Piazza, Washington Dept. of Fish & Wildlife that updates the JARPA. I have also included the wetland analysis and stream assessment information related to the project.

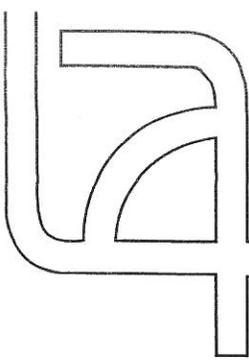
This project's sole purpose is to remove grass, sediment and woody debris that has diminished the ditches ability to carry water during rainy and storm events. This causes flooding to the adjacent agricultural fields and thus an extreme hardship by the damage the flooding creates. Not only is the goal to successfully remove the material and then maintain the ditch annually, it is to do it in such a way not to impact the environment.

This will be done by careful excavation of the material with a shovel excavator that will place the removed material in a truck. It will then be taken to an onsite covered facility where it is mixed with organic chicken manure and bagged for compost. No material is placed along the site and care will be taken along the bank not to disturb it.

No material will be removed or taken from wetlands. The stream assessment notes that there were reports of presumed Coho Salmon in the upper portion but due to a raised culvert blockage, high stream temperatures and lack of protective cover, habitat is extremely poor.

Sincerely,

Bill Diamond  
Larson & Associates, Inc



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May 7, 2012

Gina Piazza  
Area Habitat Biologist  
Washington Dept. Fish and Wildlife  
450 Port Orchard Blvd, Suite 290  
Port Orchard, WA 98366

Subject: Narrative for Wilcox Farms JARPA NWS-2010-1151

Dear Ms. Piazza:

This letter serves as an updated response for the JARPA application previously submitted on 7/8/2010 and also in response to a letter sent by you to the applicant on May 31, 2011. I have also included the SEPA checklist that was just submitted to Mr. Bob Zeigler as well as the Wetland analysis and stream assessment.

The applicant plans to use an excavator with a shovel bucket that is able to remove the material cleanly and dump it into a waiting truck. The excavator will position itself where it will work 50' of length each way before moving. The truck will then take the material to a covered area where it will be added to organic chicken manure for compost purposes.

Although the excavator will be positioned within Wetland "A" to work in the ditch, extreme care will be taken so as not to damage the wetland and just become a visitor to it. Wilcox Farms is very environmentally conscious and continues to adopt the attitude of "doing it right." Since no material is being placed on the wetlands and only minor intrusion will take place, no wetland mitigation is planned.

The attached "Stream Assessment" lists this ditch as one containing poor criteria for the habitat of either resident fish or anadromous fish. The report states:

*"Fish habitat assessment was based the presence of stream morphology and hydrology suitable to support the production and maintenance of resident or anadromous fish species."*

*The stream channel expressed poor substrate, poor vegetation, and perennial flow.*

*Based on these criteria, the site contains poor habitat for resident fishes, and poor habitat for anadromous species.*

Because of existing conditions such as the water temperature, the perennial flow, the barriers that impede upstream migration, the lack of vegetation and lack of existing earthy material in the bottom of the ditch/stream to provide marine habitat, it is unlikely that any work in this ditch can be considered a "loss" to that habitat and therefore "no net loss" should not be considered.

Proposed maintenance will occur yearly between June 15<sup>th</sup> and Sept. 15<sup>th</sup>.

Wilcox Farms has agreed to install stainless steel 2mm opening intake grates at the irrigation inlets as suggested by you for mitigation.

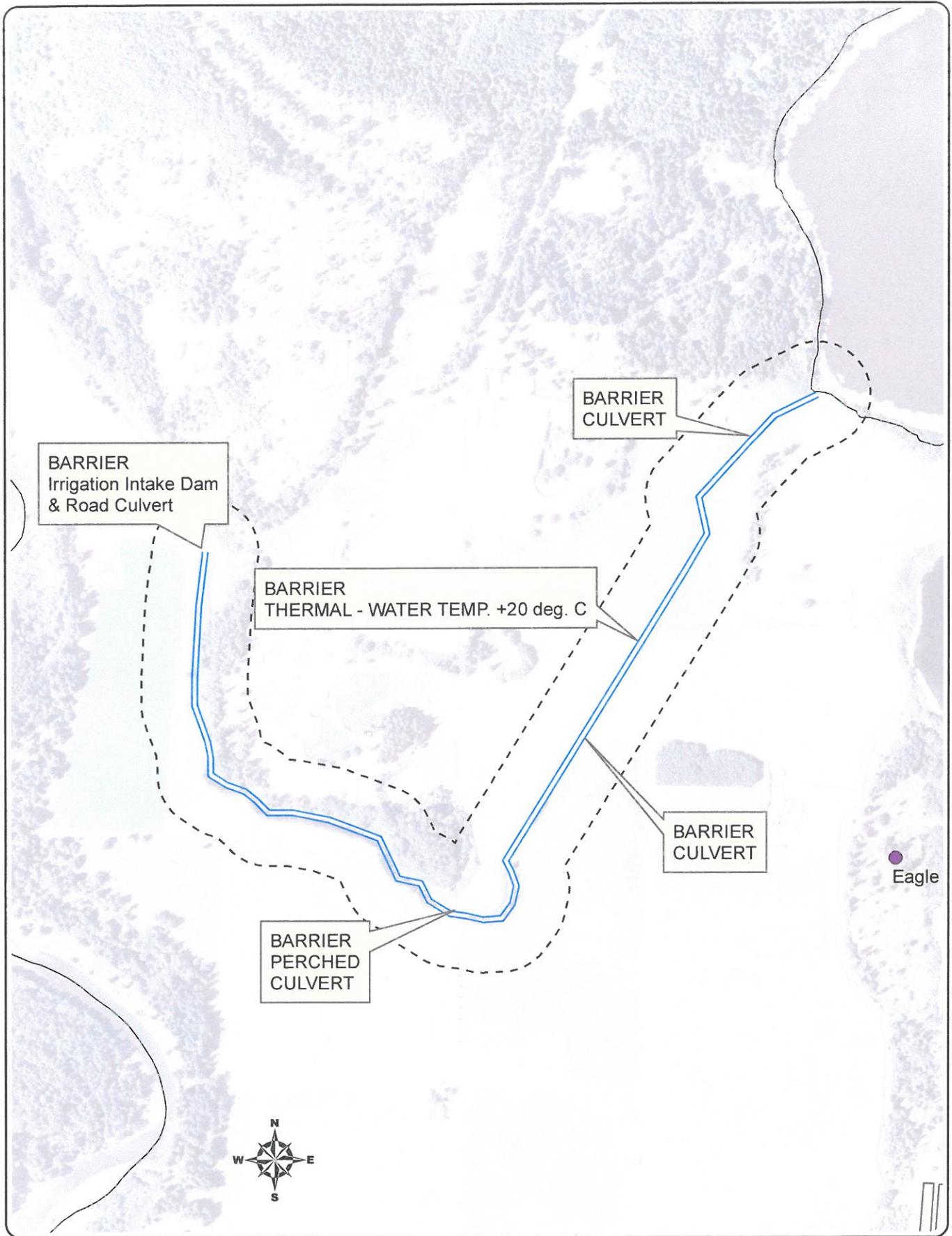
Should you have any questions or need additional information please contact me by mail, email at [bdiamond@rrlarsen.com](mailto:bdiamond@rrlarsen.com) or by telephone at 253-377-6493.

Sincerely,



Bill Diamond  
Larsen & Associates. Inc

cc: Bob Zeigler, SEPA Official, Washington State Dept. Fish & Wildlife  
Wilcox Farms

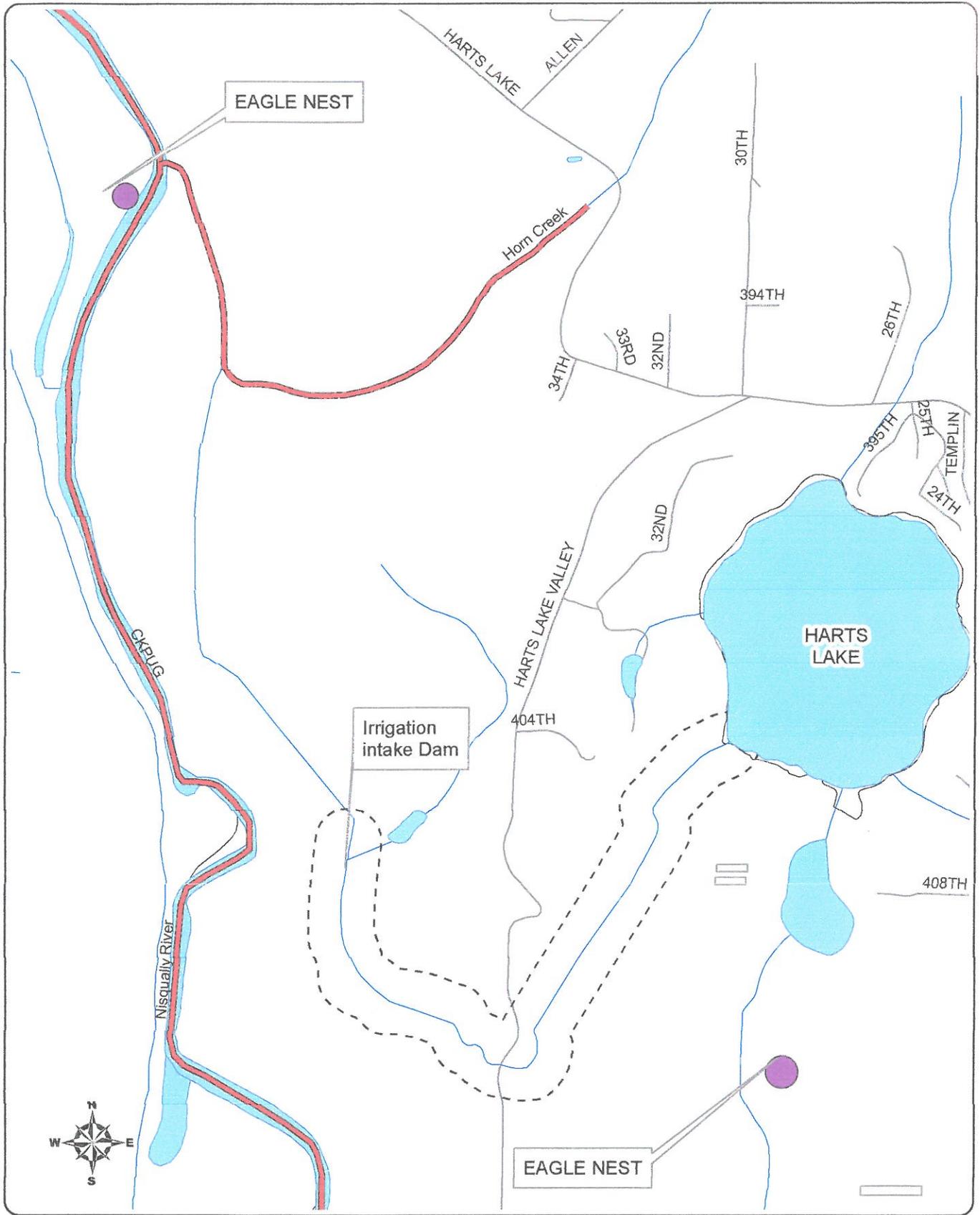


**Legend**  
 — Project Boundary  
 - - - - - 300 ft. perimeter

0 375 750 1,500 Feet  
 1 inch = 750 feet

Wilcox Ditch Maintenance  
 Project Boundaries & Fish Barriers





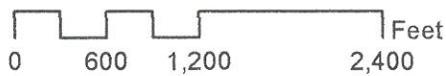
**Legend**

— Harts Cr. Ditch

- - - - - 300 ft. perimeter

— Chinook ESA Critical Habitat

● Bald Eagle Nest



1 inch = 1,250 feet

Fig. 8  
Wilcox  
Ditch Maintenance  
ESA Species Locations