

## proposed changes to wetland regulations

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To: aconroy@salisburyct.us <aconroy@salisburyct.us>

Hi Abby

I have reviewed the proposed changes to the Inland Wetland & Watercourses Regulations. I have worked in many towns in my 36 years of professional experience, including Salisbury where I have been involved in several projects. In my opinion, it would be unwise for the Town to include "highly erodible soils" in their regulated areas. There are several reasons for this:

1. The highly erodible soils, originally defined by the USDA and now by NRCS, was intended to be used when evaluating agricultural fields, and typically for large areas. It was not intended to be used at the small scale that the Town is contemplating.
2. Since there is no quantitative threshold, you could be faced with regulating projects as small as a few square feet if they happen to fall within one of the soils classified as highly erodible.
3. There will be many residents who simply won't know they are regulated because they are proposing a small project well outside off any wetland area. This could result in uneven application of the regulations.
4. No other town that I am aware of uses this criteria. For this reason, it is likely that the typical resident will not realize they should be evaluating their project using this metric.
5. I think the regulation is unnecessary. The Town already regulates erosion control plans which are required for projects that exceed ½ acre within any soil type. The Town also regulates activities close to the major lakes and in the upland review areas associated with wetlands.

Thank you for considering my input in your deliberations regarding your regulations.

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