

FINAL
OVERSIGHT AND EVALUATION
REPORT

Iowa Onsite Review

December 9, 2013

Confidential



NATURAL RESOURCES CONSERVATION SERVICE
Oversight and Evaluation Team
Office of the Regional Conservationists

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Purpose

This report is a result of a request for additional Conservation Technical Assistance (CTA) funding in a proposal entitled “North Central Wetlands Conservation Initiative in the Prairie Pothole Region.” The Oversight and Evaluation is being conducted in a two-phased approach.

- Phase I - has been completed and consisted of a quick response review which was conducted to analyze wetland determination procedures in the Prairie Pothole region (final report was completed March 3, 2011).
- Phase II - is being implemented and will include a series of reports such as this one that outlines progress being made in the prairie pothole four-state region. The four states are IA, MN, ND and SD.

Background

Phase II includes the review of approximately 80 certified wetland determinations. Eight reviews will be conducted (two in each state/fiscal year) each consisting of 10 sites (samples) that will be reviewed using both onsite and offsite procedures. Upon completion of each state review, a report is written and an exit conference conducted with the State Conservationist, the State point of contact (POC) and any additional staff the STC designates to attend.

Objectives

The objective is to achieve consistent application of national policy in rendering technical determination (certified wetland determinations) procedures within the initiative.

Scope

The scope of this project concentrates on the Prairie Pothole region and includes the states of: Iowa, Minnesota, North Dakota, and South Dakota.

Methodology

Each state review will consist of 10 sites and include both offsite and onsite processes. At the end of the fiscal year a combined report will be generated for the states within the NCWCI region that were reviewed. A conference call will be held with the State Conservationists and POCs to review the overall report. A total of eight reviews and reports will be generated.

Upon completion of all 8 reviews (total of 80 sites) a final report will be generated for the initiative. This report will include two years’ worth of combined reviews on the four state area and will be titled Phase II – Consistency.

The long range plan is to have the states annually review (include writing a report with the Findings & Recommendations) each other with a team headed up by the Wetland Compliance Specialist. Following this, the Wetland Compliance Specialist should review a percentage of those wetland certifications previously reviewed by the states and write a report with Findings and Recommendations.

Results of the Study

Two teams conducted this review and included a combination of the following: Jason Outlaw, Jim Gertsma, Lee Davis and Paul Flynn. This second round of reviews for Iowa included the counties of Kossuth, Pocahontas, Buena Vista, Osceola, Hardin, Humboldt, Hamilton and Story.

Data was collected during the period of July 22-26, 2013. The samples were randomly selected from a list of determinations (which appeared to be viable determination requests) completed by each designated conservationist or Wetland Specialist. The results of the review are as follows:

Commendable Items:

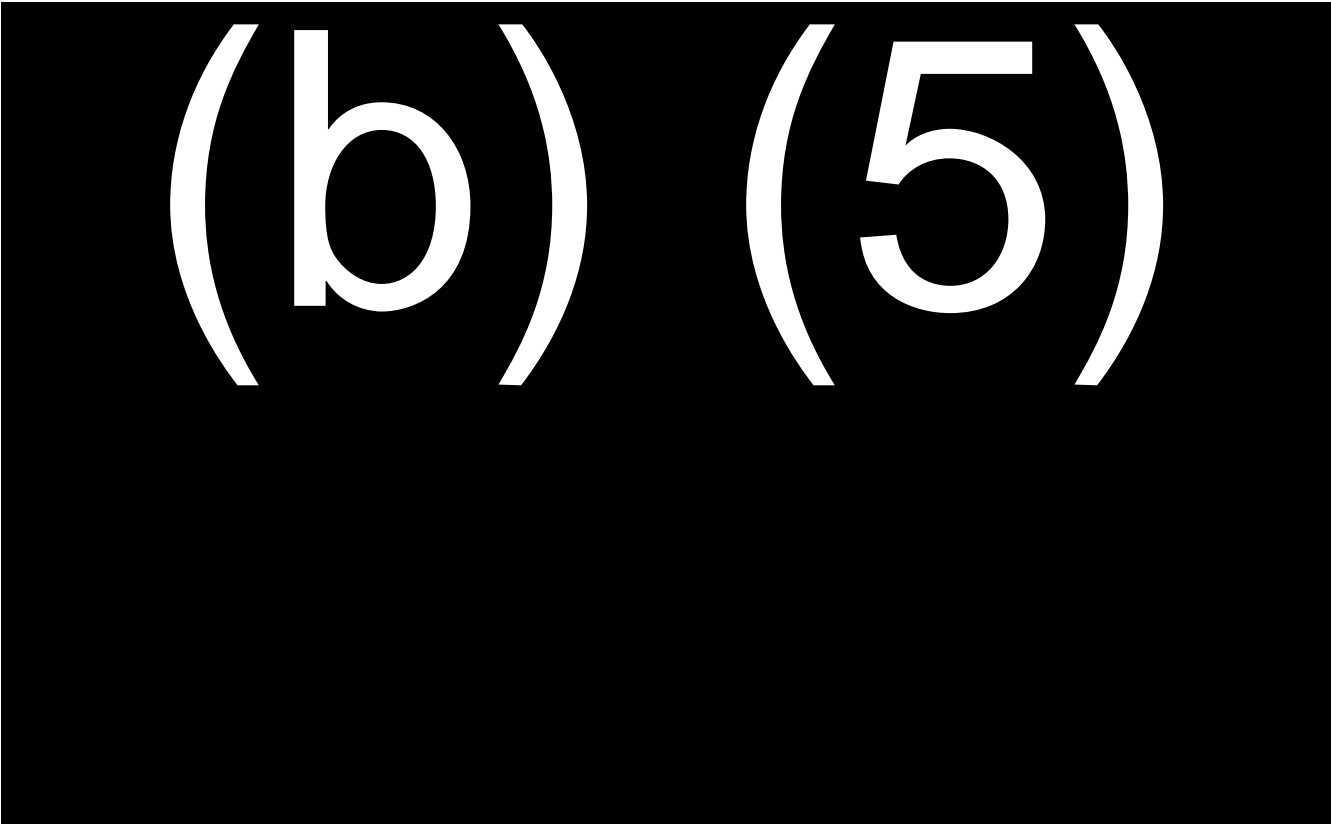
The Iowa staff was polite, helpful and professional. Any request made by the review team was serviced promptly.

Staff demonstrated a desire to follow agency policy and procedures and was willing and eager to learn the correct way to complete wetland determinations.

Finding 1 – Job Approval Authority and Training

Some designated conservationists had not received adequate training while others did not have the appropriate job approval authority (JAA). The agency is at risk of being in an indefensible position in wetland certification disputes and appeals.

In 2010, NRCS revised the national wetland ID process with the adoption of the Corps Regional Supplements and the FSA Wetland ID Procedures (NFSAM Part 527, released via Circulars 4, 5 and 6). The policy mandate (NFSAM Part 514.1 (B)(1)(i)) is that staff attend “updated” courses. In anticipation and response to these procedural changes and the policy requirement of updated courses, NRCS developed and offers two NECD wetland identification courses and a CNTSC advanced wetland determination course.



(b) (5)

(b) (5)

Finding 2 – General Wetland Determination Methods (including labels)

The methods utilized for wetland determinations (i.e. maps, numbering sites/sampling points, appropriate precipitation data sources, evidence and documentation of pre-1985 drainage, slide review data sheet, and the three level approach) failed to meet NRCS policy. Utilizing the correct methods described in policy will separate the three steps of the FSA wetland determination process (Step 1- Wetland ID; Step 2 - Assigning a WC Label; Step 3 - Determination of Size). In addition, State Offsite Methods or State Wetland Mapping Conventions will require the assessment of each of the three wetland diagnostic factors (vegetation, soils and hydrology). By not using policy prescribed methods, the agency is at risk of being in an indefensible position in wetland appeals and lawsuits.

(b) (5)

(b) (5)

Finding 3 – Offsite Wetland Identification Methods

The State Offsite Mapping (SOSM) or State Mapping Conventions (SMC) currently being used do not meet NRCS policy as they fail to require the independent consideration of all three factors. The mapping conventions fail to include and consider “recent year” aerial imagery and allows the use of “abnormal” years including both “wet and dry” aerial images when “normal” year imagery could be made available. A revised version of the SOSM has been drafted by SD for consideration by other states within the NCWCI but has been withheld from distribution through an agreement with NRCS Chief Weller. Unless SMC meeting policies are adapted, the agency is at risk of being in an indefensible position in wetland certification disputes and appeals.

The IA SMC’s limit the consideration to those years between 1980 and 1992. Many of the slides during this period are of such poor quality that they provide false negative results for wetland signatures. This results in decisions of NW or PC as a rate much higher than in ND and SD. The site visits associated with the review found that a large percentage of sites identified as PC are in fact FW. Because IA staff does not look at any imagery after 1992, violations that have occurred after 1992 are not being considered.

(b) (5)

(b) (5)

Finding 4 – Onsite Methods (Level 2&3 Determinations)

The IA staff very rarely utilizes onsite methods. Based on the field verification effort in the QAR, offsite methods are being over utilized resulting in erroneous decisions. When used, IA staff are misapplying national onsite methods. The agency is at risk of being in an indefensible position in wetland certification disputes and appeals.

(b) (5)

(b) (5)

Finding 6 – Data & Final Determination

This review indicated that the correct wetland identification decisions (vegetation, soils and hydrology) and the assignment of proper wetland conservation labels are not always being conducted according to national policy. In addition, the current approach being applied in IA results in NW and PC decisions when the site actually failed to meet the regulatory requirements for these full exemptions. The inconsistencies found by the reviewers are an indication that the agency may be at risk of being in an indefensible position in wetland certification disputes and appeals.

(b) (5)

(b) (5)

Finding 7 - Scope and Effect

Field staff in the central portion of the state (Area 2) acknowledged that a significant backlog exists for conducting “scope and effect” determinations used to determine normal circumstances. The Scope and Effect method being utilized by IA has resulted in a large backlog of wetland determinations.

(b) (5)

ADDITIONAL FINDINGS: (Significant Findings based on observations separate from the review questionnaire)

Additional Finding 1: Inadequate Current State Mapping Conventions and/or Identification/Evaluation of Sampling Units in the Base Map Development Process

The number of sampling units (potential wetlands) identified by IA staff for tracking and evaluation in the off-site slide review procedure (State Mapping Conventions) fails to meet policy resulting in a gross failure of NRCS IA in the delineation of Wetlands, Farmed Wetlands and potentially Converted Wetlands.

(b) (5)

(b) (5)

(b) (5)

For additional information and concerns see: Appendix #4 – Employee Suggestions/Concerns and Considerations based on review information

Appendix 1: Summary of Recommendations

(b) (5)

(b) (5)

(b) (5)

APPENDIX 2

NCWCI LEVEL 2 & 3 – MEASURE SUMMARY

NCWCI - MEASURE SUMMARY		
SECOND REVIEW		
Success Rate = 100% 99% -90% 89% -80% 79% -70% 69% -0%		
Measures (Expected Performance)	Iowa	Comments
JAA and Training	81%	
Wetland Determination Request	98%	
Wetland Determination Methods	36%	
Offsite Methods- all Level 1 Determinations and Level 1 portion of Level 3 Determinations	61%	
Onsite Methods (inspection necessary) - Level 2-3 and Onsite Determination Required	59%	
Appeals	60%	
Reviewer Agreed with Determinations	69%	

NCWCI - MEASURE SUMMARY		
SECOND REVIEW		
Success Rate = 100% 99% -90% 89% -80% 79% -70% 69% -0% Not Applicable		
Measures (Expected Performance)	Iowa	Comments
JAA and Training	81%	
1 The Designated Conservationist attended the Phase 2 Wetland Delineation Training.	67%	
2 The individual completing the offsite determination work had the appropriate Job Approval Authority.	83%	
3 The individual completing the onsite determination work had the appropriate Job Approval Authority.	50%	

4	The individual completing the Certified Wetland Determination had the appropriate Job Approval Authority.	83%	
5	There was a State job-approval list.	100%	
12	The person assigning the label had job approval authority.		
29	The 2nd tier staff had job approval authority on the state roster.	100%	
Wetland Determination Request (Admin)		98%	
6	If the request was on the AD-1026, box 10A, 10B or 10C was checked "yes".	94%	
7	There was a county log of AD-1026 request or an access database.	100%	
8	The request was entered on the county log or an access database.	100%	
Wetland Determination Methods (including labels)			
32	A modification/justification of the standard wetland ID methods was made, per paragraph 23 of the Corps Manual and Section A – Introduction; Corps Manual as provided by NRCS policy the FSA Procedures (5-5).	100%	
33	If yes, the purpose of the modification was explained as required in paragraph 23.	20%	Not explained as required
34	A base map was developed for the determination.	0%	The base map is not used for wetland ID; a work map is used for label assignment. No base map/acres not listed.
35	The base map was by Tract per regulations (either field per national policy or resulting from request for determination on 569).		
36	The numbering of sites and sampling points was appropriate. i.e. FSA Field Number/Sampling Unit Number (e.g. 1,S1,A)	36%	No base map.
37	The acres of the project area (entire project size) were placed on the base map per policy.	0%	No acreage on base map.
38	The FSA Variance (5-9) was followed (identify drainage prior to 1985 or post 1985 drainage).	0%	No pre-1985 drainage documented.
39	An appropriate precipitation data source was used for the pre-1985 remote data source.		
40	The precipitation data source was noted and appropriate for the "current" remote data source.	0%	None used current precipitation.
41	FSA Normal Circumstances, related to disturbance, were considered and documented as required in (5-5).	0%	Either not considered and/or not documented.
43	If 'yes', the drained conditions (considered the new normal circumstances) were considered in the wetland identification decision for each factor.	100%	
44	If drainage was noted after 1985, it was documented.		
45	The data sources considered were consistent with what is provided in the Corps Manual (items a - j in paragraph 54) and if so were the items considered noted on the COE forms.	100%	
46	A remote source (slide review) data-sheet was included and complete.	100%	
47	The facts support the decision on data sources used.	0%	Mapping conventions ignore valid date.
48	The FSA Variance (5-11) was followed.	100%	
49	The three-level approach was considered by the agency expert (Designated Conservationist).	39%	Three level approach not considered.
50	If 'yes' for Level 1 determination, each of the three wetland diagnostic factors were assessed independently and remote data sources for each factor were cited.	0%	Three wetland diagnostic factors not assessed independently and/or remote data sources not cited.
51	If 'yes' for Level 1 determination, State Offsite Methods or State Mapping Conventions were used for one or more of the factors and they were applied appropriately.	0%	SOM/SMC were either not used for one or more of the factors and/or were not applied correctly.

42	Evidence of pre-1985 drainage was documented.	22%	No pre-1985 drainage documented.
Offsite Methods- all Level 1 Determinations and Level 1 portion of Level 3 Determinations		61%	
52	The agency expert did document that he/she considered the unique definition of hydrophytic vegetation provided in the Food Security Act.	0%	The area was not observed during NEC. Not documented/not considered.
53	If variance (5-18) related to the veg. reference site was used, it was cited on the data sheet.		
55	The agency expert documented that he/she considered the unique definition of hydric soils provided in the FSA.	0%	Unique definition of hydric soils not considered.
56	If the process provided for in 7 CFR 12.31 and repeated in the FSA Variance (5-18) was used, it was used correctly and cited.	20%	Not cited.
58	The agency expert documented that he/she considered the unique definition of wetland hydrology provided in the FSA Procedures (no set days of inundation or saturation).	0%	Wetland hydrology not considered and/or documented.
60	The decisions were based on the data sources providing in the Corps Manual (Steps 4-8 of Section B – Preliminary Data Gathering and Synthesis) or SMC/SOSM.		
61	NRCS followed the 7-step procedures in paragraph 64, pg 46 of the COE Manual.		
62	This 7-step procedure was cited or supported by documentation.		
63	The field review did (quality assurance) support the decision for each of the three factors.		
64	The agency expert properly followed the three steps.	83%	No base map.
65	If the sampling unit was over 5-acres, this variance was used and cited.	50%	5 acre variance was used but not cited.
67	The decision was made at the diagnostic factor scale (using the 3-factor approach).	100%	
69	If an atypical situation was determined to occur for vegetation the methods were (par. 73; pages 74-77) applied appropriately and documented in the remarks section of COE form.	100%	
70	Chapter 5 was used appropriately (can only be used for one of the three factors).	67%	Not used appropriately.
71	The Normal Environmental Conditions (NEC) decision was made at the diagnostic factor scale.	80%	
73	If problem area methods (Section G of the Corps Manual) were used, they were applied appropriately.		
74	Chapter 5 of the supplements were also used appropriately.	67%	Not used appropriately.
75	Were the representative observation point(s) identified on the base map.	29%	No base map representative observation point(s).
77	This variance was possible and applied correctly.		
78	The sampling methods (Basal areas, height, percent cover...) from the Corps Manual (standard method) were used, and if so, applied properly.	100%	
79	The plot size and shape from Chapter 2 of the appropriate supplement (pg 16) was used (alternative method) and the reason documented in the notes.	100%	
80	The plot size and shape was modified per the flexibility provisions in par. 23.		
81	The 50/20 rule was applied correctly.	67%	No name on dominant species.
82	The indicator was applied correctly from Chapter 2.	67%	Indicator(s) incorrectly applied.

83	The possibility of a false positive or false negative was considered in context with the unique FSA definition of hydrophytic vegetation and normal circumstances PRIOR to rendering a decision on this factor and documented.	80%	
85	This variance was used and applied correctly.		
86	The location of the hydrology indicator observed was different than the representative observation point & the location of the hydrology indicator identified on the base map.	0%	No base map.
87	The Corps indicators were applied correctly from Regional Supplements Chapter 4.	100%	
88	The flexibility provisions (par. 23) were utilized and documented as required.		
89	Prior to decision making for this factor, the possibility of a false positive or false negative was considered in context with the unique FSA definition of wetland hydrology and normal circumstances and documented in notes.	71%	Not Considered
91	The hydric soils factor was considered and followed according to policy.	100%	
92	If atypical, methods were in the atypical situation for soil (par. 74 COE Manual; pg. 77 – 79) and/or Chapter 5 was used appropriately and cited.		
93	If a soil probe was used, par. 23 COE Manual was cited and the reason explained.	50%	Not cited.
94	If field indicators were used, they were applied correctly.	100%	
96	The wetland identification decision was based on recent/current normal circumstances and not 1985 conditions?	100%	
97	The adjacent wetland sampling units within the project were joined into a single wetland identification map based on the boundaries of the original sampling units identified on the base map.	0%	No base map
Onsite Methods (inspection necessary) - Level 2-3 and Onsite Determination Required		59%	
9	The target date of 1985 was considered in the selection of the remote data sources.	0%	IA uses 1980 - 1984 but fail to consider the scope and effect of the pre-1985 as built conditions (step 1, wet ID).
10	The SOSM separated the wetland ID process (based on normal circumstances) from the determination of exemption (based on specific dates within 7CFR12.5(b)).	0%	Mapping Conventions do not address this issue.
11	The remote data sources used targeted the time period in question.	0%	Remote data sources used do not target time period in question.
13	The SOSM/SOM were used in the assignment of the proper Wetland Conservation (WC) label.	100%	
15	The 026(e) was completed correctly and completely.	94%	Issued two preliminaries instead of correcting first one.
16	The CPA-026(e) was signed by the Designated Conservationist.	100%	
17	A copy of 026(e) was provided to the producer/landowner.	100%	
18	A copy of the 026(e) was provided to Farm Service Agency.	100%	
19	The size and location of each area was identified.	100%	
20	The identification on the project map was carried over to the certified wetland determination map.	0%	Not carried over to certified wetland determination map.

Appeals		60%	
21	The "NFSAM FSA Wetland ID Procedures" was cited regarding wetland identification (step 1).	0%	Not cited.
22	The 7 CFR 12.2 & 12.5(b) was cited regarding labels (step 2).	0%	Not cited.
23	The Clean Water Act (CWA) paragraph was included.	94%	
24	The appeal process followed 7 CFR 614.	0%	No written request from producer for reconsideration.
25	The reconsideration visit was conducted in the field.	100%	
26	The reconsideration was conducted by the original decision-maker (designated conservationist that issued the original 026).	50%	Conducted by DC not the Designated Conservationist.
27	The adverse decision was elevated to the STC within 15 days of the site visit.	100%	
28	The 2nd tier process (STC level) provided for an independent review (different NRCS staff decision maker).	100%	
30	Appeal rights to NAD or FSA were provided with the final determination.	100%	
31	If appealed to FSA, another site visit was conducted per 7CFR 614.		
Reviewer Agreed with Determinations		69%	
14	The reviewer agreed with the assigned Wetland Conservation (WC) label based on CFR 12.5(b) and the NFSAM.	50%	PC used too broadly; obvious wetland missed. IA needs to make use of PC/NW label.
54	Data collected during the review was consistent with the original data sheets.	100%	
57	The facts supported the decision for hydric soils.	67%	Soils not considered.
59	The facts supported the decision for wetland hydrology.	71%	IA SMC regarding using dry years; found water at three feet; documentation sheet shows only 1 yr of wetlands signatures.
66	The site visit associated with the QAR supports the numbers & locations of the sampling units used in the determination.	63%	No base map for the plotting of sampling units.
68	The facts support the decision to use or not use Atypical Situations.	100%	
72	The facts support the decision to use or not use Problem Area methods.	86%	Climate based problems but problem area methods not used.
76	The facts support the number and location of representative observation point(s) used in the determination.	14%	Location of representative observation point(s) not identified on base map.
84	The reviewer agreed with the hydrophytic vegetation decision (reviewer must consider NC and the FSA definition of hydrophytic vegetation).	71%	Called it hydrophytic but stated that the state does not support wetland hydrology.
90	The hydrophytic soils factor was considered and followed according to policy.	86%	Decided that site was not a wetland but said the site supported wetland hydrology based on false positives
95	The facts support the decision on hydric soil decision based on the FSA unique mandate of (1) a predominance and (2) the FSA definition of a hydric soil.	50%	No consideration made regarding the definition of soils. Rather the decision was made only based on indicators.

APPENDIX 3

NCWCI Level 2 & 3 – CHECK LIST

Review Number:	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	
State (Use two letter symbol):	IA	IA	IA	IA	IA	IA	IA	IA	IA	IA	IA	IA	IA	IA	IA	IA	IA	IA	
County:	Hardin	Hardin	Humboldt	Humboldt	Hamilton	Hamilton	Story	Story	Kossuth Co	Kossuth Co	Pocahontas	Pocahontas	Pocahontas	Buena Vista	Buena Vista	Buena Vista	Osceola	Osceola	
Tract Number:	7592	1803	402	8915	333	10973	10847	9413	3603	13548	672	11483	10433	5980	3149	3870	1518	1339	
Date of Review:	07/22/13	07/22/13	07/23/13	07/23/13	07/24/13	07/24/13	07/25/13	07/25/13	07/22/13	07/22/13	07/23/13	07/23/13	07/23/13	07/24/13	07/24/13	07/24/13	07/25/13	07/25/13	
Participant Name:	Mitch Summit Farms	McDowell Family	Gibert Sandven	Gilbert Sandven	Paul Sealine	Kevin Larson	Evergreen Lane Inc	Ag Leader Farm	Eva Gantenbrink	Clarence Boorman	Kyle Horner	Charles Levene	Farm LLC Dahlberg	The White Fam Rev	J. Raveling	Larry Anderson	Joel Van Gelder	Van Diepen Farms	
Certified Determination made by:	A. Steel	Matt Frana	Sam Adams	Sam Adams	Connie Roys	Connie Roys	Jeremy Johanse	Patrick Chase	Brian Tumeay	Brian Tumeay	Derrick Klimesh	Derrick Klimesh	Bob Moser	Derrick Klimesh	Derrick Klimesh	Derrick Klimesh	Ryan Ransom	Ryan Ransom	
Certification Date:	10/17/12	10/09/12	10/26/12	11/07/12	01/29/13	06/11/13	02/04/13	11/30/12	11/08/12	11/13/12	12/05/12	01/03/13	10/24/12	10/10/12	01/25/13	01/28/13	01/23/13	01/31/13	
Reviewed by:	Davis	Davis	Davis	Davis	Davis	Davis	Davis	Davis	Gertsma	Gertsma	Gertsma	Gertsma	Gertsma	Gertsma	Gertsma	Gertsma	Gertsma	Gertsma	
Type:	On-Site	Off-Site	Off-Site	Off-Site	Off-Site	Off-Site	Off-Site	Off-Site	On-Site	Off-Site	Off-Site	On-Site	On-Site	Off-Site	On-Site	On-Site	Off-Site	On-Site	Off-Site

NCWCI Oversight and Evaluation

FOR OFFSITE REVIEW (LEVEL 1) ANSWER ONLY THE QUESTIONS IN GREEN

I.	ADMINISTRATIVE REVIEW	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
1	Did the Designated Conservationist attend the Phase 2 Wetland Delineation Training?	Y	Y	Y	Y	n	n	n	n	N	N	Y	Y	Y	Y	Y	Y	Y	Y
2	Did the individual completing the offsite determination work have the appropriate Job Approval Authority?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N	N	Y	Y	Y	Y	Y
3	Did the individual completing the onsite determination work have the appropriate Job Approval Authority?	Y	x	x	x	x	x	x	x	X	X	N	N	X	N	N	Y	Y	Y
4	Did the individual completing the Certified Wetland Determination have the appropriate Job Approval Authority?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N	N	Y	Y	Y	Y	Y
5	Was there a State job-approval roster?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
6	If the request was on the AD-1026, were any of the boxes (10A, 10B or 10C) checked "yes"?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
7	Was there a county log of AD-1026 request or access database?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
8	Was the request entered on county log or access database?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
9	Was the target date of 1985 considered in the selection of the remote data sources reflective of conditions prior to 1985?	N	N	N	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n
10	Did the SOSM (or offsite methods used) separate the wetland ID process (based on normal circumstances) from the determination of exemption (based on specific dates within 7CFR12.5(b)).	N	N	n	n	n	n	n	n	N	N	N	N	N	N	N	N	N	N
Labels																			
11	Did the remote data sources used target the time period in question (for Normal Circumstances and a different data set for label assignments)?	N	N	N	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n
12	Did the person assigning the label have job approval authority?	x	x	x	x	x	x	x	x	X	X	X	X	X	X	X	X	X	X
13	Were state off-site methods (or state mapping conventions) used in the assignment of the proper Wetland Conservation (WC) label?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
14	Does the reviewer agree with the assigned WC label based on CFR 12.5(b) and the NFSAM?	n	n	Y	Y	n	n	n	n	n	Y	n	n	Y	Y	Y	Y	Y	Y
CPA-026 & Transmittal Letter																			
15	Was the 026(e) completed correctly and completely?	Y	Y	Y	n	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y

16	Was the CPA-026(e) signed by Designated Conservatorist?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
17	Was a copy of 026(e) provided to the producer /landowner?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
18	Was a copy of the 026(e) provided to FSA?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
19	Was the size and location of each area identified?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
20	Was the identification on the base map carried over to the certified wetland determination map?	N	N	n	n	n	n	n	n	n	n	n	n	n	n	N	n	N	N
21	Was the "NFSAM FSA Wetland ID Procedures" cited in transmittal letter regarding wetland identification (step 1)?	N	N	n	n	n	n	n	N	N	N	N	N	N	N	N	N	N	N
22	Was 7 CFR 12.2 & 12.5(b) cited regarding labels (step 2)?	N	N	n	n	n	n	n	N	N	N	N	N	N	N	N	N	N	N
23	Was the Clean Water Act paragraph included?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y
Appeals																			
24	Did the appeal process follow 7 CFR 614?	x	X	x	n	x	x	x	x	X	X	n	X	X	X	X	X	X	X
25	Was the reconsideration visit conducted in the field?	x	x	x	y	x	x	x	x	X	X	Y	X	X	X	X	X	X	X
26	Was the reconsideration conducted by the original decision-maker (designated conservatorist that issued the original 026)?	x	x	x	n	x	x	x	x	X	X	Y	X	X	X	X	X	X	X
27	Was the adverse decision elevated to the STC within 15 days of the site visit.	x	x	x	y	x	x	x	x	X	X	Y	X	X	X	X	X	X	X
28	Did the 2 nd tier process (STC level) provide for an independent review (different than the original NRCS staff decision maker)?	x	x	x	y	x	x	x	x	X	X	Y	X	X	X	X	X	X	X
29	Did the 2 nd tier staff have job approval authority on the state roster?	x	x	x	y	x	x	x	x	X	X	Y	X	X	X	X	X	X	X
30	Were appeal rights to NAD or FSA provided with the final determination letter?	x	x	x	y	x	x	x	x	X	X	Y	X	X	X	X	X	X	X
31	If appealed to FSA, was another site visit conducted per 7CFR 614?	x	x	x	x	x	x	x	x	X	X	X	X	X	X	X	X	X	X
WETLAND DETERMINATION METHODS																			
Section A - Introduction																			
32	Was a modification /justification of the standard wetland ID methods made, per paragraph 23 of the Corps Manual and Section A – Introduction; Corps Manual as is provided by NRCS policy the FSA Procedures (5-5)?	X	x	x	x	x	x	x	x	X	X	Y	X	x	X	X	x	X	X
33	If yes, was the purpose of the modification explained as required in paragraph 23?	n	n	n	n	x	x	x	x	X	X	Y	X	x	X	X	x	X	X
Section B - Preliminary Data Gathering and Synthesis																			
34	Was a base map developed for the determination?	N	n	n	n	n	n	n	n	n	n	n	N	n	n	N	N	n	n
35	Was the base map by the Tract per regulations either Field per national policy or resulting from request for determination on 569)?	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
36	Was the numbering of sites and sampling points appropriate? i.e. FSA Field Number/Sampling Unit Number (e.g. 1,S1A)	x	x	x	x	x	x	x	y	Y	Y	N	N	N	N	N	N	Y	N
37	Were the acres of the project area (entire project size) placed on the base map per policy?	n	n	n	n	n	n	n	n	N	N	N	N	N	N	N	N	N	N
38	Was the FSA Variance (5-9) followed? (Identify drainage prior to 1985 or post 1985 drainage)	n	n	n	n	n	n	n	n	n	N	n	n	N	n	N	n	n	n
39	Was an appropriate precipitation data source used for the pre-1985 remote data source?	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
40	Was the precipitation data source noted and appropriate for the "current" remote data source?	n	n	n	n	n	n	n	n	N	N	N	N	N	N	N	N	N	N

41	Were FSA Normal Circumstances, related to disturbance, considered and documented as required in (3-1 thru 3-5)?	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	X	n
42	Was the evidence of pre-1985 drainage documented?	n	n	n	n	n	n	n	n	Y	N	Y	N	N	n	N	n	Y	Y	
43	If 'yes', were the drained conditions (considered the new normal circumstances) considered in the wetland identification decision for each factor?	x	x	x	x	x	x	x	x	Y	X	Y	X	X	x	X	X	Y	Y	
44	If drainage was noted after 1985, was it documented?	x	x	x	x	x	x	x	x	x	X	X	x	X	X	X	X	X	X	
45	Were the data sources considered consistent with what is provided in the Corps Manual (Items a - j in paragraph 54) and if so were the items considered noted on the COE forms?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	
46	Was a remote source (slide review) data-sheet included and completed?	Y	Y	Y	Y	Y	Y	Y	x	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	
47	Do the facts support the decision on data sources used?	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	
	Section C: Selection of Method																			
48	Was the FSA Variance (5-11) followed?	x	x	x	x	x	x	x	x	x	Y	Y	x	Y	Y	x	Y	Y		
49	Was the three-level approach considered by the agency expert (Designated Conservationist)?	Y	n	n	n	n	n	Y	n	n	n	Y	Y	n	Y	Y	n	Y	n	
	Section D - Routine Determinations																			
50	If this is a Level 1 determination, were each of the three wetland diagnostic factors assessed independently and remote data sources for each factor cited?	X	n	n	n	n	n	n	x	N	N	x	x	n	x	x	N	x	N	
51	If this is a Level 1 or Level 3 determination, were State Offsite Methods or State Mapping Conventions used for one or more of the factors and if so were they applied appropriately?	X	n	n	n	n	n	n	x	x	x	n	n	x	n	n	x	n	x	
	For ALL Level 1 & Level 3 determinations and the Level 1 (offsite) portion of the Level 3 determinations:																			
	Vegetation																			
52	Did the agency expert document that he/she considered the unique definition of hydrophytic vegetation provided in the Food Security Act?	x	N	n	n	n	n	n	x	x	x	N	N	x	N	N	x	N	x	
53	If variance (5-41) related to the veg. reference site was used, was it cited on the data sheet?	x	X	x	x	x	x	x	X	X	X	X	X	X	X	X	X	X	X	
54	Are data that was collected during the review consistent with the original data sheets?	Y	x	x	x	x	x	x	Y	X	X	x	x	X	x	x	x	x	x	
	Soils																			
55	Did the agency expert document that he/she considered the unique definition of hydric soils provided in the FSA?	x	N	n	n	n	n	n	n	N	N	N	N	N	N	N	N	N	N	
56	If the process provided for in 7 CFR 12.31 and repeated in the FSA Variance (5-18) was used, was it correctly and cited?	x	N	n	n	n	n	n	n	X	X	Y	X	Y	X	X	X	X	n	
57	Do the facts support the decision for hydric soils?	x	n	Y	Y	Y	n	Y	x	X	X	Y	x	Y	X	x	X	x	n	
	Hydrology																			
58	Did the agency expert document that he/she considered the unique definition of wetland hydrology provided in the FSA Procedures (no set days of inundation or saturation)?	x	N	n	n	n	n	n	n	N	N	N	N	N	N	N	N	N	N	
59	Do the facts support the decision for wetland hydrology?	x	n	Y	Y	n	Y	n	Y	n	n	Y	Y	Y	Y	Y	Y	Y	Y	
	If the Corps off-site methods were used for one or more of the factors, rather than NRCS state off-site methods:																			
60	Were the decisions based on the data sources providing in the Corps Manual (Steps 4-8 of Section B - Preliminary Data Gathering and Synthesis)?	x	X	x	x	x	x	x	x	X	X	X	X	X	X	X	X	X	X	

61	Did NRCS follow the 7-step procedures in paragraph 64, pg 46 of the COE Manual?	x	x	x	x	x	x	x	x	X	X	X	X	X	X	X	X	X	X
62	Was this 7-step procedure cited or supported by documentation?	x	x	x	x	x	x	x	x	X	X	X	X	X	X	X	X	X	X
63	Do the facts support the decision for each of the three factors?	x	x	x	x	x	x	x	x	X	X	X	X	X	X	X	X	X	X
Subsection 2 – Onsite Inspection Necessary (Level 2 and Level 3 determinations) (Either all or part onsite)																			
64	Did the agency expert properly follow the three steps?	N	x	x	x	x	x	x	x	x	x	Y	Y	x	Y	Y	x	Y	x
65	If the sampling unit is over 5-acres, was this variance used and cited?	X	x	x	x	x	x	x	x	x	x	Y	X	x	X	Y	x	n	n
66	Did the site visit associated with the QAR support the numbers & locations of the sampling units?	n	x	x	x	x	x	x	n	x	x	Y	Y	x	Y	n	x	Y	Y
67	Was the decision made at the diagnostic factor scale?	y	x	x	x	x	x	x	y	x	x	Y	Y	x	Y	Y	x	Y	Y
68	Do the facts support the decision to use or not use Atypical Situations?	Y	x	x	x	x	x	x	y	x	x	Y	Y	x	Y	Y	x	Y	x
Vegetation																			
69	If an atypical situation was determined to occur for vegetation were the methods (par. 73; pages 74-77) applied appropriately and documented in the remarks section of COE form? pages 74-77) applied appropriately and documented in the remarks section of COE form - Step 1 (Page 42 Wetland Delineation Manual)?	Y	x	x	x	x	x	x	x	x	x	Y	X	x	X	X	x	X	X
70	Was Chapter 5 used appropriately (can only be used for one of the three factors).	Y	x	x	x	x	x	x	n	x	x	Y	X	x	X	X	x	X	X
71	Was the Normal Environmental Conditions (NEC) decision made at the diagnostic factor scale?	N	x	x	x	x	x	x	x	x	x	Y	x	Y	Y	x	Y	x	
72	Do the facts support the decision to use or not use Problem Area methods?	Y	x	x	x	x	x	x	n	x	x	Y	Y	x	Y	Y	x	Y	x
73	If problem area methods (Section G of the Corps Manual) were used, were they applied appropriately?	X	x	x	x	x	x	x	x	x	X	X	x	X	X	x	X	X	
74	Was Chapter 5 of the supplements also used appropriately?	Y	x	x	x	x	x	x	n	x	x	y	X	x	X	X	x	X	X
75	Were the representative observation point(s) identified on the base map?	N	x	x	x	x	x	x	y	x	x	X	N	x	Y	N	x	N	N
76	Do the facts support the number and location of representative observation point(s)?	N	x	x	x	x	x	x	n	x	x	X	n	n	Y	x	n	x	n
77	If variance (5-48) was used, was it applied correctly?	X	x	x	x	x	x	x	x	x	x	X	X	x	X	X	x	X	X
78	Was the sampling methods for vegetation (Basal areas, height, percent cover...) from the Corps Manual (routine method) used, and if so, was it applied properly?	Y	x	x	x	x	x	x	x	x	x	X	x	x	Y	Y	x	Y	x
79	Was the plot size and shape from Chapter 2 of the appropriate supplement used (alternative method) and was the reason documented in the notes?	x	x	x	x	x	x	x	x	x	x	X	Y	x	X	X	x	X	X
80	Was the plot size and shape modified per the flexibility provisions in par. 23?	x	x	x	x	x	x	x	x	x	x	X	X	x	X	X	x	X	X
81	Was the 50/20 rule applied correctly?	Y	x	x	x	x	x	x	n	x	x	X	N	x	Y	Y	x	Y	x
82	Were the indicators applied correctly from Chapter 2?	N	x	x	x	x	x	x	y	x	x	X	n	x	Y	Y	x	Y	x
83	Was the possibility of a false positive or false negative considered in context with the unique FSA definition of hydrophytic vegetation and normal circumstances PRIOR to rendering a decision on this factor and was it documented?	X	x	x	x	x	x	x	n	x	x	X	Y	x	Y	Y	x	Y	x
84	Did the reviewer agree with the hydrophytic vegetation decision (reviewer must consider NC and the FSA definition of hydrophytic vegetation)?	N	x	x	x	x	x	x	n	x	x	Y	Y	x	Y	Y	x	Y	x

		Wetland Hydrology																		
85	Was this variance (5-62) used and applied correctly?	X	x	x	x	x	x	x	x	x	x	X	X	x	X	X	x	X	X	
86	If the location of the hydrology indicator observed is different than the representative observation point was the location of the hydrology indicator identified on the base map?	N	x	x	x	x	x	x	x	x	x	X	X	x	X	X	x	X	X	
87	Were the Corps indicators applied correctly from Regional Supplements Chapter 4?	Y	x	x	x	x	x	x	y	x	x	y	Y	x	Y	Y	x	Y	x	
88	Were the flexibility provisions (par. 23) utilized and if so was documentation provided as required?	X	x	x	x	x	x	x	x	x	x	X	X	x	X	X	x	X	X	
89	Prior to decision making for the hydrology factor, was the possibility of a false positive or false negative considered in context with the unique FSA definition of wetland hydrology and normal circumstances documented in notes?	N	x	x	x	x	x	n	x	x	y	Y	x	Y	Y	x	Y	x		
90	Do the facts support the decision on wetland hydrology (reviewer must consider NC and the FSA definition of wetland hydrology of hydrophytic vegetation)?	N	x	x	x	x	x	y	x	x	Y	Y	x	Y	Y	x	Y	x		
		Hydric Soils																		
91	Was the hydric soils factor considered and followed according to policy?	Y	x	x	x	x	x	x	y	x	x	Y	x	x	Y	X	x	X	x	
92	If atypical, were the methods in the atypical situation for soils (par. 74 COE Manual; pg. 77 – 79) and/or was Chapter 5 used appropriately and cited?	X	x	x	x	x	x	x	x	x	x	X	X	x	X	X	x	X	X	
93	If a soil probe was used, was par. 23 COE Manual cited and the reason explained?	Y	x	x	x	x	x	n	x	x	X	X	x	X	X	x	X	X		
94	If field indicators were used, were they applied correctly?	y	x	x	x	x	x	y	x	x	X	X	x	X	X	x	Y	x		
95	Do the facts support the decision on hydric soil decision based on the FSA unique mandate of (1) a predominance and (2) the FSA definition of a hydric soil?	n	x	x	x	x	x	n	x	x	Y	X	x	X	X	x	Y	x		
96	Was the wetland identification decision based on normal circumstances and not 1985 conditions?	X	x	x	x	x	x	y	x	x	Y	X	x	Y	Y	x	Y	x		
97	Were the adjacent wetland sampling units within the project joined into a single wetland identification map based on the boundaries of the original sampling units identified on the base map?	N	x	x	x	x	x	n	x	x	X	X	x	X	X	x	X	X		

APPENDIX 4 – EMPLOYEES INTERVIEWED AND INTERVIEW SUMMARY

IA EMPLOYEES INTERVIEWED

EMPLOYEE & TITLE	Teleconference Date
Sam Adams (DC)	August 12
Don Carrington (RC in SO)	August 12
Ryan Ransom	August 12
Matthew Frana	August 12
Derrick Klemish	August 12
Kevin McCall (AC)	August 12
Connie Roys (DC)	August 12
Patrick Chase (Soil Scientist)	August 13
Allison Orr (DC)	August 13
Jeremy Overstreet	August 13
Damaris Mortenson (AC)	August 13
Marty Adkins	August 14
Jennifer Anderson – Curz (ARC)	August 14
Sue Snyder – Thomas	August 15

Full time Wetland Specialist

State Office or Area Office

Co-lateral duty

INTERVIEW SUMMARY

General Information

All Iowa staff cooperated and appeared to be honest with their answers. Half of the employees completing wetland determinations were co-lateral and half were full time Specialists. Experience in making certified wetland determinations among the employees interviewed, ranged from relatively new (with NCWCI funds) to several years.

Wetlands Training

When asked about wetlands training received, most employees felt good about the quality of training they had received from NHQ Staff but there was a wide range in the amount of training each employee had received. The following training had been taken by the employees interviewed (those that complete wetland determinations, numbering eight in total):

- two employees (both co-lateral duty employees) had not had either Phase II or the Advanced Course
- two employees had taken the Advanced Course but not Phase II
- one employee had Phase II Training but not the Advance Course
- three Specialist had taken both Phase II and the Advanced Course

Information asked and received

This group of questions pertained to who the employees called for information and how they felt about the answers they received:

- Who do you call when you have wetland questions? The answers to this question varied from ARCs to other Area or State Office staff.
- Do you get a timely answer? Most answered “yes” (a few said most of the time).
- Do you feel like the answers are based on laws, regulations and policy? These answers were split between yes, no, and not sure; with most employees saying yes, one said based on their experience but not policy, a few said the best they know how & one said politics can cause the answer to veer away from policy.
- Do you feel answers given are consistent within the area/state? These answers were all over the board with answers like: yes, no, sometimes, Area & State Offices differ, inconsistent between ARC’s, & consistent for that day.

Quality Assurance

When asked questions pertaining to quality assurance, the answers were all over the board with the following:

- Most answered no QAR’s were taking place from the State or area offices within last 5 years. But if they had questions they would ask someone.
- A few employees stated that when they were new (Specialists) they were reviewed regularly until they were put on the “list”.
- Co-lateral employees said there were peer reviews (they would prepare the paperwork & send it to adjoining county to review & sign CPA-026).
- One of the area offices said they review 1/3 of all offices within the area every year.
- State Office said starting in 2013 they reviewed one area & one office within that area.

Appeals

Most employees seemed to understand the appeals process. The majority of the answers consisted of - if a producer requests a reconsideration they would meet them in the field for a review & give the producer an opportunity to provide any additional drainage documentation. If the determination remained adverse they developed a 6 part folder and forward this to the area office. Once the area office reviewed this, the folder was then forwarded to the State Office.

If a producer wants a Scope & Effect evaluation, it is forwarded to the Area Engineer which slows the process significantly. Some have been backlogged for over a year.

Pressure to NOT render an adverse decision or expansion of wetland acreage

- All employees said they felt no pressure to NOT render an adverse decision from the agency with five saying they did feel some pressure from the producers/contractors but would still make the correct call.
- Most employees said they did not feel pressure to expand wetland acreage, with one stating not unless producer wanted to get into some type of program that they needed additional acreage for.

Wetland Determination Request Timeframes

When asked how long it takes to complete a wetland request on an AD-1026, including both the backlog and without a backlog, most employees stated they did not have a backlog with a few stating 40-60 requests. When asked how long it takes to complete a determination most said 4-8 hours all the way up to 1-2 months.

Most stated the Scope & Effect backlog could be a year plus.

State Office and Area Office reviews:

- No Quality Assurance Plan was provided from either the State Office or the area offices. There is currently no policy pertaining to this issue, however it is still a 'good idea' to have one for both the State Office and area offices (i.e. who will be reviewed, when they will be reviewed, who will review them, etc.).
- Currently no QAR's are being completed by the State Office. Both area offices appear to work closely with new employees (Specialists). Neither area office has a consistent QAR plan.

(b) (5)

APPENDIX 5

Exhibit - Certified Wetland Determination Story County, IA 389-Acre Tract

The determination used as an example in this exhibit was randomly selected for review as part of the National Quality Assurance Review conducted for the North Central Wetland Conservation Initiative (NCWCI). It is typical of determinations in IA. The IA offsite procedures utilize “normal years” of photography (slides) between 1982 and 1992 and identify potential wetlands (sampling units). Many of the slides from this period are of poor quality and were taken very late in the growing season. The poor-quality, late-season slides commonly mask wetland signatures or fail to show wetland signatures. Potential wetlands are not being assessed, resulting in certified determinations that fail to identify various Wetlands (W), Farmed Wetlands (FW) and Converted Wetlands (CW+year). In addition, Wetland Conservation Compliance (WCC) labels are biased towards conditions dryer than what would occur under normal circumstances (conditions during the normal wet portion of the growing season under normal climatic conditions).

Within this exhibit, various products are provided to convey the issues discovered during the review.

- **Exhibit 1A:** A recent NAP imagery is provided of the 389-acre tract with the CLU boundaries. Many obvious and subtle wetland signatures can be observed. The IA staff identified 5 potential wetlands (“sampling units”).
- **Exhibit 1B:** The certified wetland determination map showing two basins as FW and the remainder of the tract as PC/NW. Thus, out of the 5 sampling units, 2 were determined to be FW and the other 3 were determined to be PC.
- **Exhibit 1C:** A proper base map developed by the Fort Worth Remote Sensing Lab using national protocols. The Lab identified 59 potential wetlands (sampling units) in contrast to the IA staff’s five. Using the same data set (1982-1992), coupled with a more recent NAP imagery, the RSL determined that the tract had 12 areas meeting wetland criteria, 27 areas that might meet wetland criteria (needs further consideration) and 20 areas did not meet wetland criteria.
- **Exhibit 1D:** A preliminary wetland determination map, developed by the Fort Worth Remote Sensing Lab using the same remote data set (1982-1992) and protocols from North Dakota. This preliminary determination found 12 W’s and 9 FW’s in contrast to the IA certified determination of 0 W’s and 2 FW’s.

The disparity between decisions being made in IA and similar decisions being made in ND and SD fail to meet legal mandates that NRCS render fair and equitable decisions (decisions that are not capricious). In addition, the wetland determination process being used in IA is arbitrary, as IA staff are rendering decisions without sufficient consideration of the facts.

Exhibit 1A: NAP Imagery (2012) of the 389-acre tract in Story County IA is provided. Using old aerial slides, rather than quality imagery for the base map, IA staff identified only 5 potential wetlands (sampling units) on this tract. The Fort Worth Remote Sensing Lab identified 59 potential wetlands.



Exhibit 1B: The certified wetland determination for a 389-acre tract in Story County, IA. IA staff identified 5 potential wetlands (sampling units). Of those five, three were determined to be PC and two were determined to be FW. No evidence of pre-1985 drainage manipulations (surface or subsurface) were observed during the QAR site visit for the two FW sites. The deep basin located just north of the 0.4 acre FW was as deep and wet as others and had no drainage. IA staff determined it to be PC.



Exhibit 1C: A base map of the 389-acre tract, produced by the Remote Sensing Lab, using the same years of photography as used by IA staff. The Lab identified 59 sampling units (potential wetlands) in need of consideration and a determination. A “Y” (n=12) designates the area as a wetland (would be a FW or W). An “M” (n=27) designates the area as maybe a wetland, needing further consideration (onsite). An “N” (n=20) denotes that the area is not a wetland and would be a PC.

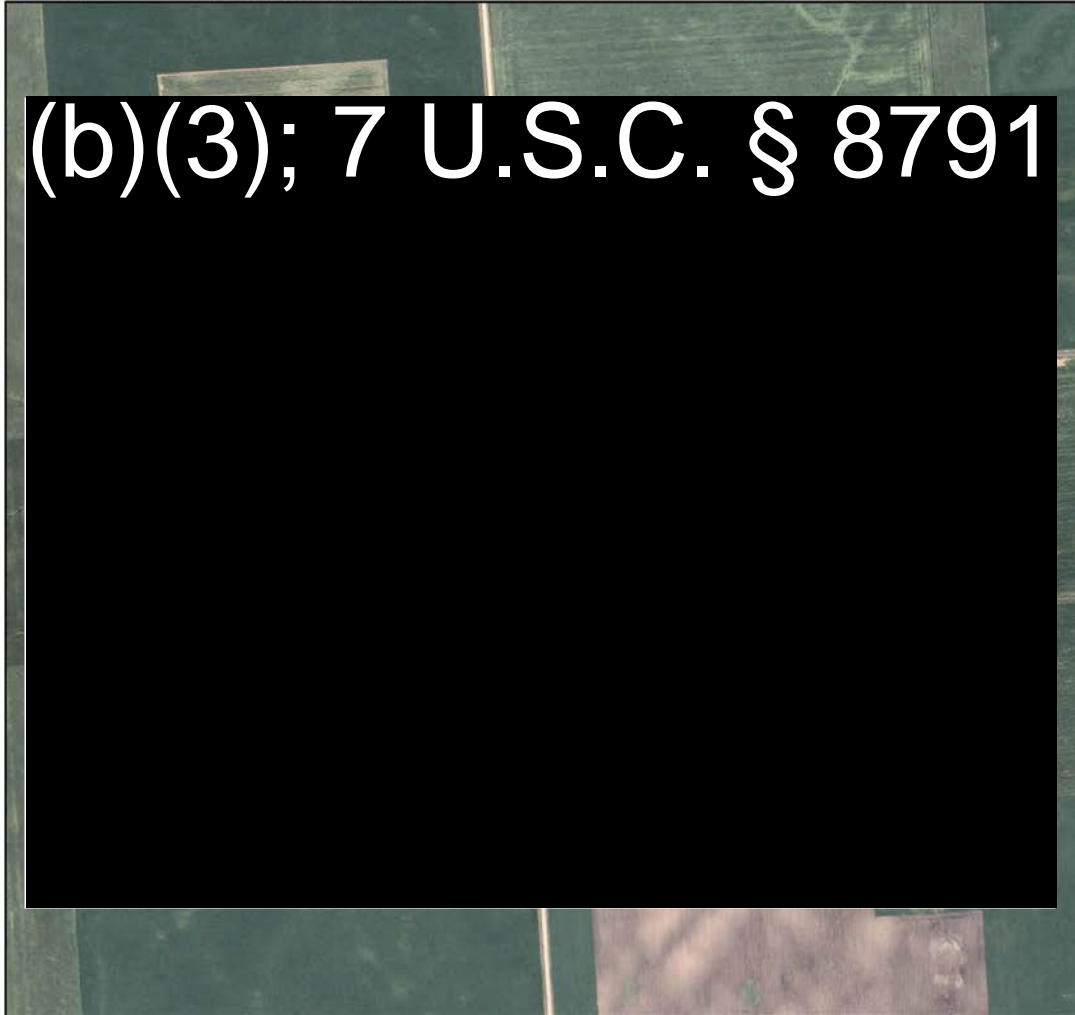
Offsite Wetland Base Map

Field Office: Boone

Agency: USDA-NRCS

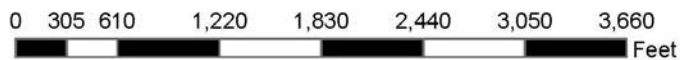
Legal Desc: Sec 20, 28, 29 Richland Twp

Tract: 10847



Legend

-  Certified Wetland Determination Boundary
-  Wetlands
-  Ditch
-  Field Review Needed



- W Wetland
- FW Farmed Wetland Drained or modified & cropped prior to 12-23-1985, but still meets wetland criteria
- PC Prior Converted
- NW Non Wetland
- NI Not Inventoried Potential Waters of the US

See NRCS CPA-O26E for definitions and additional info.



Exhibit 1D: A preliminary wetland determination map produced by the RSL for the same 389-acre tract. The Lab found 22 W's and 11 FW's. This compares to the results found by Iowa NRCS including no W's and two FW's. The Lab's results are similar to the decisions being made by NRCS staff in ND and SD.

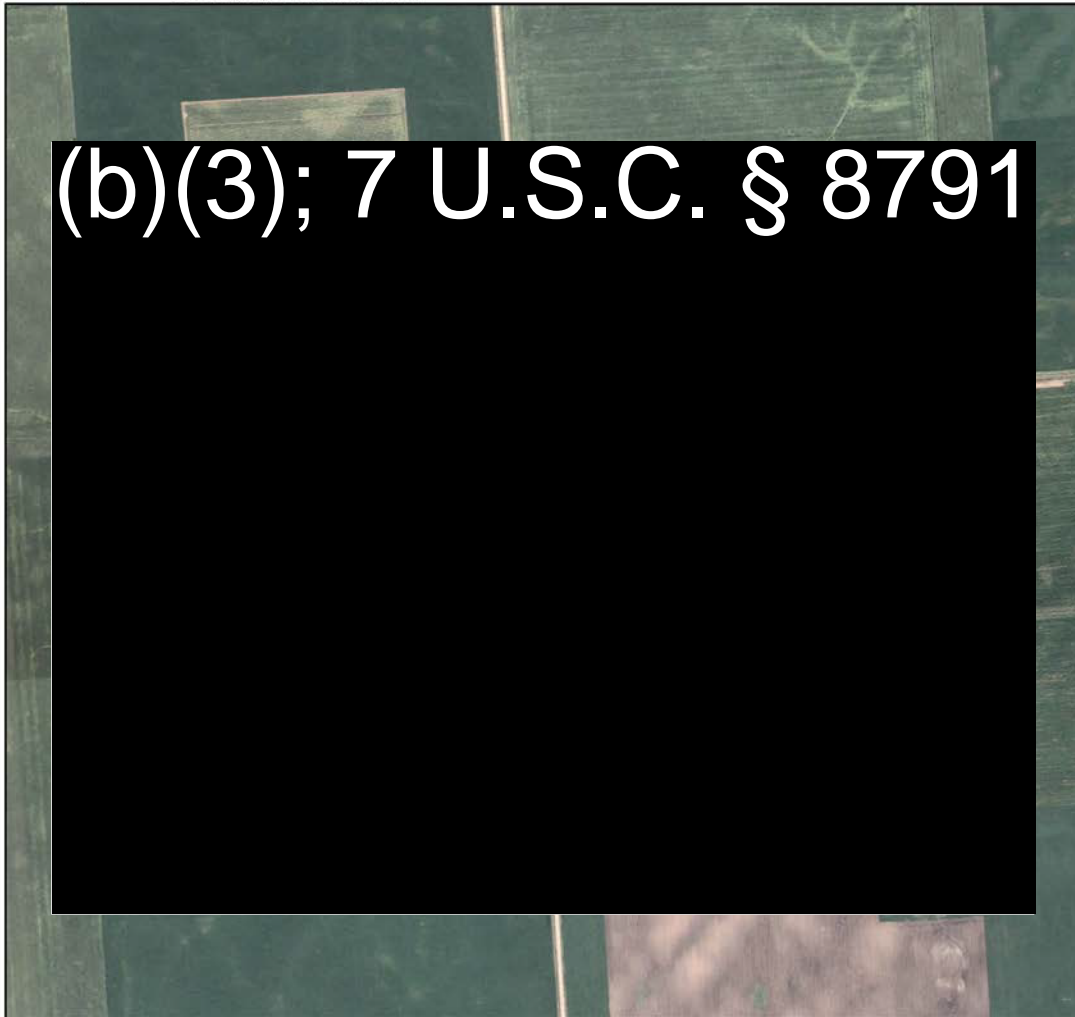
Offsite Wetland Working Map

Field Office: Boone

Agency: USDA-NRCS

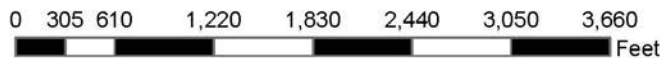
Legal Desc: Sec 20, 28, 29 Richland Twp

Tract: 10847



Legend

-  Certified Wetland Determination Boundary
-  Wetlands
-  Ditch
-  Field Review Needed



W	Wetland
FW	Farmed Wetland Drained or modified & cropped prior to 12-23-1985, but still meets wetland criteria
PC	Prior Converted
NW	Non Wetland
NI	Not Inventoried Potential Waters of the US
See NRCS CPA-O26E for definitions and additional info.	



APPENDIX 6 – Briefing of Draft

A briefing of the draft version of this report was completed on December 17, 2013.

Those present included:

Jay Mar, State Conservationist

Jon Hubbert, ASTC/Operations

Don Carrington, Resource Conservationist

Rick Bednarek, State Soil Scientist

Lee Davis, CNTC Biologist

Paul Flynn, Prairie Pothole Wetland Project Manager

Jim Gertsma, Area Resource Soil Scientist, Iowa

Jason Outlaw, National Wetland Compliance Specialist

Teresa Stewart, O&E Staff