



June 4, 2021

Inland Wetlands & Watercourses Agency
Town of Coventry
1712 Main Street
Coventry, CT 06238

Dear Inland Wetlands & Watercourses Agency:

A Preliminary Technical Determination for wetlands on a portion of Hytone Farm was issued on May 26, 2021 in accordance with 7 Code of Federal Regulations, Part 12. That certified wetland determination/delineation was conducted for the purpose of implementing the wetland conservation provisions of the Food Security Act of 1985, as amended. On June 3, 2021 I received communication through USDA-NRCS staff that your Agency is amenable to consider utilizing the Food Security Act wetland determination boundaries for permitting of stormwater structures(s) relating to the proposed water storage facility and digester project. Planning drawings were provided with project titles "Proposed Anaerobic Digester – Grading Plan ES-1" and "Proposed Anaerobic Digester – Overall Site Plan SP-1", both of which had representations of the wetland determination boundaries adapted from the Food Security Act determination referenced above. I have reviewed these drawings and provide the following statements regarding those products:

- 1) The on-site wetland boundary shown on the plan drawings is consistent with the wetland determination boundaries in the Certified Wetland Determination map mailed to the producer on May 26, 2021.
- 2) The approximated wetland boundary provided outside the limits of the Certified Wetland Determination map mailed to the producer on May 26, 2021 appear to be reasonable as they were created using an off-site method similar what USDA-NRCS staff would use for issuing an offsite determination for implementing the wetland conservation provisions of the Food Security Act of 1985, as amended. A combination of aerial photography and landscape/terrain interpretation are typically used along with other ancillary data to determine what meets wetland definition criteria and the wetland boundary.

As USDA-NRCS staff, I do not have the express authority to formally represent the producer before the Inland Wetlands & Watercourses Agency nor may I issue a specific Inland Wetlands and Watercourses Act wetland delineation for your review. However I feel it is within my authority and responsibilities relating to Food Security Act wetland determinations to make the statements above regarding an adaptation of my wetland determination for this purpose, as once issued said wetland determination is the property of the producer to use as they see fit.

Thank you for your time and consideration,

Jacob Isleib
Soil Scientist
USDA-NRCS

Natural Resources Conservation Service
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