



Memorandum

Date: December 20, 2019

Subject: Haley Short Plat – Shoreline Critical Areas Report Peer Review
(31600141.000)

From: Dustin Day, PWS

To: Lauren Hollenbeck, Senior Planner, City of Camas

Route To: Robert Maul, Planning Manager, City of Camas

INTRODUCTION

The City of Camas (City) contracted with WSP to evaluate the critical areas report (the report) prepared by The Resource Company, Inc. (TRC) for the Haley Short Plat dated October 24, 2019. The purpose of the evaluation is to review the report and advise and assist the City in determining whether the report satisfies the requirements of and/or addresses the applicable criteria found in Sections 16.51 and 16.61 of Appendix C to the Camas Shoreline Master Program (SMP).

Qualifications

My educational experience includes a bachelor's degree in Biology from Western Michigan University and a master's degree in Environmental Management from Portland State University. I have more than 21 years of professional natural resource experience and have held a Professional Wetland Scientist (PWS) certification through the Society of Wetland Scientist for 9 years. My education and experience meet the minimum qualification established by the City in Chapter 7 – Definitions of the SMP.

SECTION 16.51 OF APPENDIX C – GENERAL PROVISIONS

WSP reviewed the report to assess its compliance with Section 16.51 (General Provisions) of Appendix C. The provisions designate and classify ecologically sensitive and hazardous areas and specify protection for them and their functions and values, while allowing some reasonable use of property. WSP has concluded that the report generally meets these provisions with the following exceptions.

Section 16.51.170 – Mitigation Plan Requirements

- Section 16.51.170(A) – Environmental Goals and Objectives. This section requires that the mitigation plan identify the goals and objectives of the compensation proposed and analyze the likelihood of the mitigation project's success. The TRC report does not specify goals and objectives specific to the project.
- Section 16.51.170(F) – Financial Guarantees (see also Section 15.51.230 – Bonds). This section requires financial guarantees, as determined by the approval authority, to ensure the

mitigation plan is fully implemented. It is not known what form of financial guarantee the approval authority will require, and no guarantees were proposed in the mitigation plan, but the form and amount could be a condition of approval.

Section 16.51.220 – Critical Areas Protective Mechanism

- Section 16.51.220(A) requires placing the identified critical areas and their associated buffer or management zone in a permanent protective mechanism acceptable to the City. A conservation covenant was not proposed but could be a condition of approval.

SECTION 16.61 OF APPENDIX C – FISH AND WILDLIFE HABITAT CONSERVATION AREAS

WSP has reviewed the report to assess its compliance with Section 16.61 (Fish and Wildlife Habitat Conservation Areas [FWHCA]) of Appendix C. WSP has concluded that the critical areas report generally meets these provisions. Specific provision analysis is detailed below.

Section 16.61.010 – Designation of FWHCA

The report has identified FWHCA in accordance with the code, identifying the Columbia River as an area of primary association for threatened and endangered species and as a water of the state. WSP concludes this section of code has been adequately addressed.

Section 16.61.020 – Critical Area Report Requirements for Habitat Conservation Areas

The report has addressed the criteria established in this section. The report was prepared by a qualified professional and discusses the areas that must be addressed, including the project area, shoreline areas, water features, floodplains, and other critical areas and buffers, and the project design and applicability of buffers. In addition, the report includes a habitat assessment documenting existing vegetation and FHWCA's. The report also discusses federal, state, and local special management recommendations as well as avoidance, minimization, and mitigation; and includes a discussion of monitoring and maintenance management practices.

Section 16.61.030 – Performance Standards

The report details the proposed short plat and subsequent residential development. The report explains that, because of site constraints posed by steep slopes and proximity to the Columbia River, complete avoidance was not feasible. The report describes how the proposed project has minimized habitat disruption beyond the extent required to undertake the proposed short plat by proposing the future residential development in the outer 50 percent of the stream buffer width and mitigating for the reduced stream buffer through buffer enhancements. The mitigation measures proposed include several measures discussed in Section 16.61.030(A)(4) of Appendix C, including e–j and n–p. The plan also meets Provisions B (Nonindigenous Species Shall Not be Introduced) and C (Mitigation Should Result in Contiguous Corridors) of Section 16.61.030. No nonindigenous species are proposed in the planting plan and a contiguous corridor along the Columbia River has been preserved.

Additionally, the report meets the mitigation plan requirements detailed in Provision F of Section 16.61.030, including a planting plan that specifies plan species, quantities, locations, size,

spacing and density, along with measures to protect and maintain plants until established, a monitoring program, and an adaptive management plan. Based on the information provided, the applicant has demonstrated that the proposed project will substantially comply with Section 16.61.030 of Appendix C.

Section 16.61.040 – Performance Standards – Specific Habitats

Section 16.61.040 includes specific habitat performance standards and Section 16.61.040(D) pertains to stream buffer widths and is applicable for this project. Section 16.61.040(D)(2)(b) is the standard that needs to be met when reducing and/or averaging stream buffer widths. However, Section 16.61.040(D)(4) – Alternative Mitigation for Stream Buffer Areas – allows the applicant to propose alternate impacts and mitigation measures provided the applicant demonstrates that greater habitat functions, on a per function basis, can be obtained. The report addresses the criteria of Section 16.61.040(D)(4), proposing to reduce 20,800 square feet of the outer 50 percent of the stream buffer and enhance 20,080 square feet of the inner 50 percent (75 feet) of the stream buffer with native trees and shrubs at a 1:1 ratio. The report proposes to remove existing non-native, aggressive plant species from the enhancement area and along the shoreline and perform maintenance to keep the area free of these species. Finally, the report states that no existing mature black cottonwood trees will be removed as part of the proposed short plat. The proposed buffer reduction area is dominated by maintained grasses and provides reduced or limited habitat functions. Based on the mitigation measures proposed in the report, the project will provide greater habitat functions, on a per function basis, upon completion, including the associated maintenance and monitoring. Based on the information provided, the applicant has demonstrated that the proposed project will substantially comply with Section 16.61.040 of Appendix C.

CONCLUSION

The critical areas report dated October 24, 2019, substantially meets the requirements of Sections 16.51 and 16.61 of Appendix C. Specifically, the report meets the requirements of Section 16.61.040(D)(4), which requires the applicant to demonstrate that greater habitat functions, on a per function basis, can be obtained in the affected drainage basin. The applicant will enhance 20,080 square feet of the inner 75 feet of the stream buffer with native trees and shrubs (1:1 ratio). The applicant will also remove existing non-native, aggressive plant species from the enhancement area and along the shoreline and perform maintenance to keep the area free of these species. Finally, no existing mature black cottonwood trees will be removed as part of the proposed short plat. The proposed buffer reduction area is dominated by maintained grasses and provides reduced or limited habitat functions. Based on the proposed mitigation measures, the applicant will provide greater habitat functions, on a per function basis, upon completion of the proposed mitigation measures and associated maintenance and monitoring.

This memorandum documents the conclusions and best professional judgment of WSP. The information it provides should not be solely relied upon for determining compliance with applicable regulations.