Exhibit 30 SUB22-01

# HOOD STREET PROJECT PRELIMINARY WETLAND MITIGATION PLAN

# Camas, Washington



Prepared for: Modern NW. 8101 NW Glisan Portland, OR 97213 Prepared by: Olson Environmental, LLC 222 E. Evergreen Blvd. Vancouver, WA 98660 (360) 693-4555

August 31, 2021



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#### PRELIMINARY WETLAND MITIGATION PLAN

Project:	Hood Street
Applicant:	Modern NW
Location:	1811 Hood Street, Camas, Washington
Legal Description:	: NE & NW ¼ of Section 09,T1N, R3E, W. M., Clark County
Serial Number(s):	127415-000 (4.67 ac.) and 127440-000 (1.41 ac.)
Local Jurisdiction	: Camas
Study Area Size:	6.08 acres
Watershed:	Lacamas Creek/Dwyer Creek (10)
WRIA:	28 Salmon/Washougal
Project Type:	Residential
Zoning:	R-7.5
CompPlan:	SFM (Single Family Medium)
Assessment by:	Kevin Terlep
Report Date:	August 31, 2021

#### 1.0 INTRODUCTION

This report details a preliminary wetland mitigation plan prepared by Olson Environmental, LLC (OE) for Modern Northwest (Applicant). The study area is located at 1811 Hood Street in Camas, Washington (Fig 1). The study area is a total of 6.08 acres and includes the entirety of parcel 127415-000 (4.67 acres) and 127440-000 (1.41 acres). The Applicant is proposing to build a 17-unit single-family residential housing development, including roads and parking spaces (Fig. 2). This report addresses compensatory mitigation for proposed direct and indirect impacts to a wetland occurring on the site, as regulated by the Camas Municipal Code (CMC) 16.53 (Wetlands), the Washington State Department of Ecology and the US Army Corps of Engineers under Sections 404 and 401 of the Clean Water Act, respectively.

#### 2.0 EXISTING CONDITIONS

The majority of the study area is open grassland, it slopes moderately from the northeast to the southwest (Fig. 3). One existing house is located in the northeast corner of the property. The eastern property line is immediately parallel to Northwest Hood Street and NW Columbia Summit Drive and NW Klickitat Street are to the north and west, respectively. The property is located within the Dwyer Creek sub-watershed of the Lacamas Creek watershed (WRIA 28). Photographs of the study area are provided in Photo-Sheet 1.

#### 2.1 WETLANDS

OE conducted a wetland assessment within the project area on June 11, and 14, 2021 using the USACE methodology found in the Regional Supplement to the Manual (USACE 2010). Through the course of the field investigation, one (1) wetland was identified along the west property line (Fig. 4) in the area indicated by a previous wetland study. This wetland appears to be a remnant of a larger wetland that extended to the northeast and continues onto the property to the west. Vegetation within the wetland is dominated by soft rush (*Juncus effusus* -FACW), teasel

(*Dipsacus fullonum* -FAC), velvet grass (*Holcus lanatus* -FAC) and reed canary grass (*Phalaris arundinacea* -FACW). Soils within the wetland are characterized by dark brown to very dark grayish brown matrices (7.5-10YR 3/1) at depths of 0-16 inches, with 2-5% strong brown (7.5YR4-6) redox concentrations occurring at depths 6-16 inches within the matrix. The hydric soil indicator for these soils was redox dark surface (F6). The wetland hydrology indicators were geomorphic position (D2), oxidation within the rhizosphere of living roots (C3) and passing the FAC-neutral test (D5). A summary of the identified wetland is provided in Table 1.

Table 1. Summary	of Identified Wetlands
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Wetland Identifier	HGM Class	Area	
A	Slope 11,480 sq. ft.		.26 ac.

#### 2.2 WETLAND FUNCTIONAL ASSESSMENT

The 2014 Update of Washington State Wetland Rating System for Western Washington (Hruby, 2014) was used to assess the functional characteristics of the identified wetland unit. For the purposes of the functional rating, the HGM class of the wetland unit was used to determine the applicable rating form. The delineated wetland was rated as a Category IV slope wetland with a habitat score of 3 (Table 2). The wetland exhibits emergent vegetation, seasonal saturation from precipitation, and surface runoff.

#### Table 2. Wetland Functional Ratings and Buffers

Wetland Identifier	HGM Class used for Rating	Water Quality Score	Hydrologic Score	Habitat Score	Total Score	Wetland Category
А	Slope	4	4	3	11	IV

#### 2.3 WETLAND BUFFERS

CMC 16.53.040 provides for the protection of wetlands within Camas's jurisdiction. The ordinance establishes protective buffers associated with wetlands and specifies that certain permits or approvals be obtained for projects containing wetlands or their respective buffers.

CMC requires that Category IV wetlands with habitat function scores of 3 to be protected with a 50-foot high-intensity land use buffer (CMC Table 16.53.040-1). The buffer width for the identified wetland is depicted in Figure 4 and summarized in Table 3, below. In addition to CMC 16.53, jurisdictional wetlands are also regulated at the federal and state levels by the US Army Corps of Engineers (USACE) and the Washington State Department of Ecology (Ecology) under Sections 404 and 401 of the Clean Water Act, respectively. Any impacts to the wetlands may require notification and approval from the USACE and Ecology.

Wetland	Local Jurisdiction		Habitat Score	Adjacent Land	Buffer Width
Identifier			(level of function)	Use Intensity	(feet)
A	City of Camas	IV	3 (Low)	High	50 ft.

 Table 3. Wetland Buffers – High Land Use Intensity

#### 3.0 AVOIDANCE AND MINIMIZATION

The proposed project was designed to avoid direct and indirect wetland impacts to the greatest extent possible. However, to provide for an economically viable project, the Applicant is unavoidable direct and indirect impacts which are outline in Section 4.0. The following additional measures will be taken to avoid additional impacts:

- 1. The wetland, and wetland buffer boundaries will be temporarily flagged in the field prior to construction.
- 2. Erosion control measures (e.g. straw bale sediment barriers or sediment fence) will be installed to prevent siltation from entering the sensitive areas during construction.
- 3. The erosion control measures will be removed once construction is completed and vegetation has become established.

#### 4.0 PROPOSED WETLAND IMPACTS

Following the determination of wetland boundaries and buffer areas, the proposed site plan of the project was used to determine the area of unavoidable impacts associated with development activities. Based on the proposed site plan, Wetland A will be impacted by leveling, excavation and filling as part of the residential development, resulting in approximately 0.09 acres (3,384  $ft^2$ ) of direct wetland impact and .13 acres (5,656  $ft^2$ ) of indirect wetland impact (Fig. 5). The proposed impact areas are summarized in Table 4, below.

Wetland Identifier	Wetland	Total Area	Impact	Area
	Category		Direct Impacts	Indirect Impacts
A	IV	11,480 ft <sup>2</sup> (.26 ac)	3,874 ft <sup>2</sup> (.09 ac)	5,656 ft <sup>2</sup> (.13 ac)

#### **Table 4: Summary of Total Impact Area**

#### 5.0 MITIGATION APPROACH

For the proposed unavoidable wetland impacts associated with the project, the Applicant is proposing the purchase of bank credits as a means of compensation, as provided by CMC 18.270.120.D. The direct and indirect impacts to Wetland A for the Hood Street Project will be compensated through the purchase of credits from the Terrace Wetland Bank (TWB). TWB is located approximately 8.75 miles northwest of the project area (Fig. 6), within the Burnt Bridge Creek Watershed. The bank site has been extensively farmed for at least 60 years, which has drastically altered all aspects of the wetland, including the hydrology through the installation of drain tiles, the soils through repetitive plowing, and the vegetation through continued agricultural

production. There was the potential to create a significant amount of functional lift to wetlands and other aquatic resources on the project site, by reestablishing and restoring the historic wetland system and improving existing stream complexity. Ecology's Selecting Wetland Mitigation Sites Using a Watershed Approach (2009) was used to evaluate the mitigation potential of the site. The bank sponsor is proposing to re-establish 85.02 acres of wetland, rehabilitate 4.02 acres of wetland, enhance 0.10 acres of wetland, and the enhancement of 2.53 acres of open channel enhancement along Burnt Bridge Creek.

The service area for TWB is shown in Figure 7 and includes the project area. The credit-debit ratio for the bank is outlined in Table 5 (Bank Instrument – Appendix E, Table E-2). Wetland A is a Category IV wetland as rated by Ecology's updated rating system for western Washington (Hruby 2014). As per the approved TMB bank instrument, Category IV wetlands are compensated at a rate of .85:1. The indirect wetland impacts for Wetland A are compensated at one-half the direct impact ratio as per previous discussions with Ecology.

Therefore, the applicant is proposing to purchase 0.132 bank credits (Table 6) to compensate for the 0.09 acres of direct wetland impacts and 0.13 acres of indirect impacts to Wetland A. No credits are currently available and new credits will not be released until the spring of 2022. The Applicant is working with the bank manager to reserve credits until they are released.

Table 5. Typical	<b>Credit-Debit Ratios</b>	from Terrace	Mitigation Ba	nk Instrument
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Tuble 5. Typical Orean Debit Ratios from Terrace Miligation Dank Instrument					
Resource Impact	Bank Credits: Impact Acreage				
Wetland, Category I	Case-by-Case				
Wetland, Category II	1.2:1				
Wetland, Category III	1:1				
Wetland, Category IV	.85:1				
Critical Area Buffer	Case-by-Case				

#### **Table 6: Mitigation Bank Credits Proposed for Wetland A Impacts**

	Total Wetland Direct Area Impact Area			Indirect Impact Area		Wetland Rating	Credits Required per ratio/impact		Proposed Mitigation Credit Purchase
.26 ac	11,480 ft <sup>2</sup>	.09 ac	3,874 ft <sup>2</sup>	.13 ac	5,656 ft <sup>2</sup>	IV	Direct .85:1 .077	Indirect .425:1 .055	.132

#### 6.0 LITERATURE CITED

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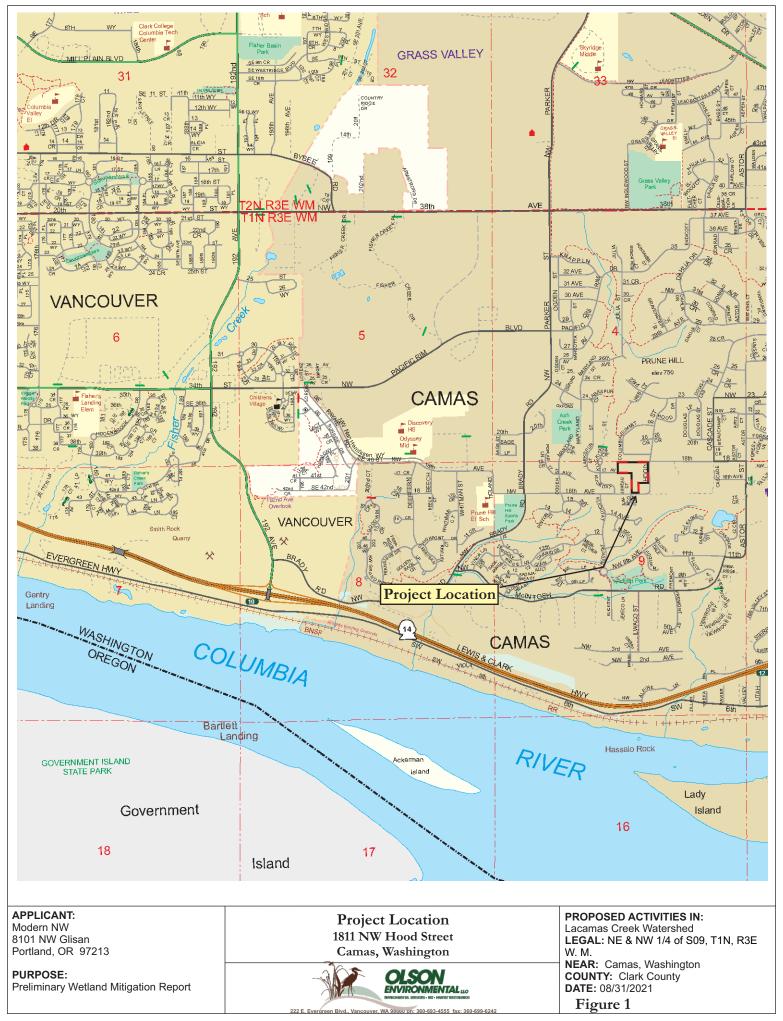
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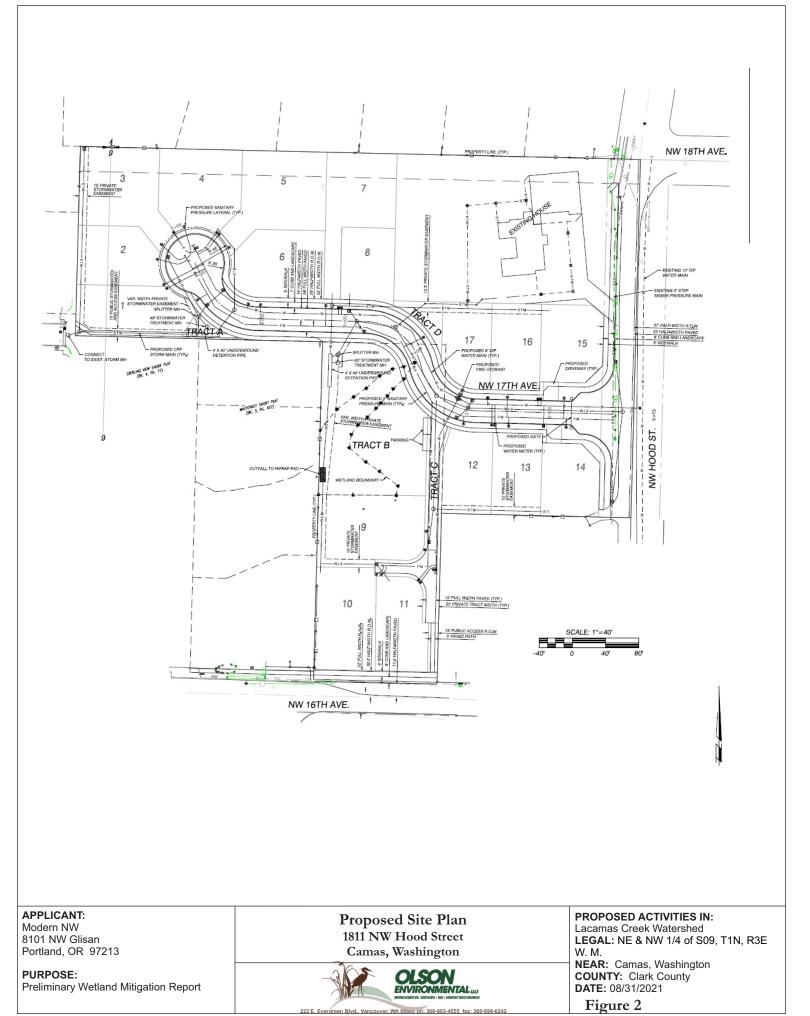
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PURPOSE: Preliminary Wetland Mitigation Report

**APPLICANT:** 

Camas, Washington



Lacamas Creek Watershed LEGAL: NE & NW 1/4 of S09, T1N, R3E W. M. NEAR: Camas, Washington COUNTY: Clark County DATE: 08/31/2021 Figure 3



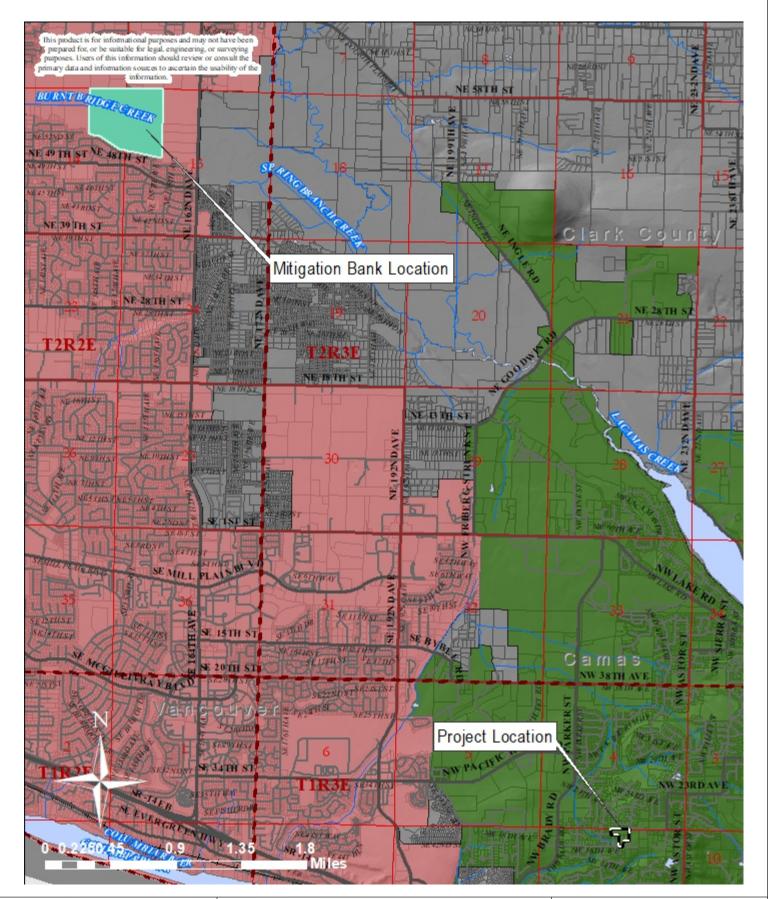


PURPOSE: Preliminary Wetland Mitigation Report

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Figure 5

#### Exhibit 30 SUB22-01



APPLICANT: Modern NW 8101 NW Glisan Portland, OR 97213

PURPOSE: Preliminary Wetland Mitigation Report Project and Terrace Wetland Bank Locations 1811 NW Hood Street Camas, Washington



en Blvd., Va

**PROPOSED ACTIVITIES IN:** Lacamas Creek Watershed LEGAL: NE & NW 1/4 of S09, T1N, R3E W. M. NEAR: Camas, Washington COUNTY: Clark County DATE: 08/31/2021 Figure 6



APPLICANT: Modern NW 8101 NW Glisan Portland, OR 97213

PURPOSE: Preliminary Wetland Mitigation Report Project Location & Terrace Wetland Bank Service Area 1811 NW Hood Street Camas, Washington



PROPOSED ACTIVITIES IN: Lacamas Creek Watershed LEGAL: NE & NW 1/4 of S09, T1N, R3E W. M. NEAR: Camas, Washington COUNTY: Clark County DATE: 08/31/2021 Figure 7

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Wetland Finger Facing East



Wetland Finger Facing West



Top of Wetland Facing West



Maples Along Northern Property boundary



Bottom of Wetland Facing South



Western Property Boundary Facing 16th Ave

APPLICANT: Modern NW 8101 NW Glisan Portland, OR 97213

PURPOSE: Preliminary Wetland Mitigation Report

Photo Sheet 1 1811 NW Hood Street Camas, Washington

OLSON **ENVIRONMENTAL**<sub>40</sub> WA 98660 ph: 360-693-4555 fax: 360-699-6242

PROPOSED ACTIVITIES IN: Lacamas Creek Watershed Lacamas Creek Watersned LEGAL: NE & NW 1/4 of S09, T1N, R3E W. M. NEAR: Camas, Washington COUNTY: Clark County DATE: 08/31/2021 Photo-Sheet 1