



SCHOTT & ASSOCIATES

Ecologists & Wetlands Specialists NING & BUILDING

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MEMO

RE: Willow Ridge at Cornwall Street HCA Mapped Boundaries

March 30, 2017

This memo is being provided as the applicant believes that the Metro HCA mapped boundaries are in error on the subject property containing Tax lot 6300 located at the street address of 4096 Cornwall Street, West Linn, Oregon.

The City of West Linn uses the Metro's Urban Growth Management Functional Plan (UGMFP) Title 13 Habitat Conservation Areas (HCA) map to identify habitat conservation areas in the City. The above subject property contains HCA mapped as Riparian Class II within the southeastern corner of the tax lot.

Per Chapter 28 Willamette and Tualatin River Protection 28.070 Planning Director Verification of Metro Habitat Protection Map Boundaries:

- A) The HCA Map is the basis for identifying and designating the habitat conservation areas in the City. It is inevitable, given the large area that Metro's HCA Map covers, that there may be some errors. In cases where, for example, three properties share the same contours and the same natural features but the map shows the middle lot with an HCA designation on it, it is reasonable to question the accuracy of that HCA designation. Using tree overstory as the sole basis for HCA designation will also allow a change in designation since trees are already protected in the municipal code and Chapters 55 and 85 CDC.
- B) The planning director shall verify the appropriate HCA or non-HCA designation by site visits or consultations with Metro or by other means. Determination is based on whether the Metro criteria are met or whether the Metro designation was based solely on tree overstory in which case a redesignation is appropriate. In cases where the determination is that the map is incorrect, the Planning Director will make a written finding of this as well as the site conditions that led to that conclusion.

Metro designation was based solely on tree overstory and a boundary correction is appropriate. A site visit and delineation were completed by Schott & Associates, Inc. on March 10, 2017 on the subject property. The entire property was walked and a natural resource assessment was done to determine the actual extent of the HCA overlay.

The rectangular shaped tax lot is situated at the terminus of Cornwall Street, west of Sessex Street and north of Fairhaven Drive. Residential houses are located on all sides of the project area. An

existing house is located in the northeastern corner of the lot, with associated outbuildings to the west. The southern half of the lot is steeply sloped to the south.

The vegetation in the undeveloped portion of the lot was dominated by Himalayan blackberry (*Rubus armeniacus*). There was a small patch of reed canary grass (*Phalaris arundinacea*) within the middle of the sloped hill in the southern half of the lot. Sample plots were taken and conditions did not meet the three wetland criteria; hydrophytic vegetation, hydric soils and wetland hydrology. For an area to be a wetland it has to meet all three criteria. The soils on this site were not hydric. Rose (*Rosa pisocarpa*) was prevalent along the southeastern extent of the lot where the slopes level out. A few larger locust trees were located on the property.

An unidentified tributary to Salamo Creek is located east of the site. The landscape surrounding the tributary was steeply sloped and dominated by non-native Himalayan blackberry. The tributary is approximately 170 feet off site to the southeast located in the bottom of a draw. Slopes within 50 feet of the creek were digitally measured and found to range from 16 to 28 percent.

Per Metro Title 13: Nature in Neighborhoods

3.07.1340 (d.) Administering the Habitat Conservation Areas Map and Site Level Verification of Habitat Location

- (4.) Habitat Boundaries
 - (A.)Locating riparian habitat and determining its habitat class is a five step process.
 (i) Step 1. Locate the water feature that is the basis for identifying riparian habitat:
 - 1) Locate the top of bank of all streams, rivers, and open water within 200feet of the property.

No access was obtained for the adjacent property. The creek was identified as approximately 170 feet south east of the site, outside of the tax lot boundary.

- 2) Locate all flood areas within 100 feet of the property.

 Slopes surrounding the creek ranged from 16 to 28 percent. No flood areas were identified within 100 feet of the property.
- 3) Locate all wetlands within 150 feet of the property based on the local wetland inventory map (if completed) and on the Metro 2004 Wetland Inventory Map. Identified wetlands shall be further delineated consistent with methods currently accepted by the Oregon Division of State Lands and the US Army Corps of Engineers.

No wetlands were located within the study area boundary. An unidentified tributary to Salamo Creek is located approximately 170 feet to the southeast of the site. The tributary is offsite and

identified on the Significant Riparian Corridors map for West Linn Goal 5 Inventory. The landscape surrounding the tributary was steeply sloped ranging from 16 to 28 percent slopes and dominated by non-native Himalayan blackberry.

(ii.) Step 2. Identify the vegetative cover status of all areas on the property that are within 200 feet of the top of bank of streams, rivers and open water, are wetlands or are within 150 feet of wetlands, and are flood areas and within 100 feet of flood areas.

Only a small portion of the property in the southeastern corner is identified as HCA habitat. The HCA defines the area as within 200 feet of the top of bank to the offsite stream. No wetlands were identified within the HCA mapped corner of the lot. The vegetation was dominated by Himalayan blackberry. The slopes were steep and sloped off site to the southeast.

- 1.) Vegetative cover status shall be as identified on the Metro Vegetative Cover Map, attached hereto and incorporated herein by reference. The vegetative cover type assigned to any particular area was based on two factors: The type of vegetation observed in aerial photographs and the size of the overall continuous area of vegetative cover to which a particular piece of vegetation belonged. As an example of how the categories were assigned, in order to qualify as "forest canopy" the forested area had to be part of a larger patch of forest of at least one acre in size; and
- 2.) In terms of mapping the location of habitat, the only allowed corrections to the vegetative cover status of a property are those based on an area being developed prior to the local program effective date and those based on errors made at the time the vegetative cover status was determined based on analysis of the aerial photographs used to create the Metro Vegetative Cover Map (for the original map, the aerial photos used were Metro's summer 2002 photos) and application of the vegetative cover definitions provided in the footnotes to Table 3.07-13d.

Through observation of the summer 2002 Google Earth aerials we believe the HCA boundary was mapped using the vegetative cover of the scrub/shrub canopy. The shape of the boundary basically matches the aerial (see Figure 1: Metro HCA, Figure 4: 2002 Aerial Photo). While the

mapping of the habitat may be scrub/shrub, the cover was predominantly Himalayan Blackberry, which is considered an invasive species and offers little ecological function. Additionally, the area was not found to be a Riparian Zone. Adjacent properties identified within the HCA overlay had existing buildings.

In conclusion, the mapped HCA is low quality due to the non-native, invasive vegetation and lack of significant tree cover. The tributary to Salamo Creek is approximately 170 feet from the eastern tax lot boundary. A request is being made to correct the boundary within the tax lot boundary based the lack of significant habitat and lack of tree habitat associated with the tributary to the southeast of the site. The vegetation is non-native, invasive and of very low value and these areas should not be mapped as HCA.

Attachements:

Figure 1. Metro HCA

Figure 2. HCA Stream Detail Area

Figure 3. Stream Detail with Topographic

Figure 4. Overall existing Conditions

Figure 5. 2002 Aerial Photograph

West Linn Map created by: public Date Created: 17-Mar-17 10:34 AM Allow Development **WEST LINN GIS** Stream Lines Feet 0 150 Legend Sun Garden Monte 22722246 2206 2461 6 4465 4469 2202246 2200 0 4435 4410 4405 4255 2225 4575 2320 22902284 222 4553 23532323 22832257 2230 4221 PANENIAM DI Open 4258 4320 2111 (#20) 4273 4224 4323,4318 4255 Pool St Sunset Grass 4210 4243 4296 Bittner St 4231 4213 4272 4650 2345 4322 nation should review or consult the primary data and information sources to ascertain the usability of the information. Map scale is app 4238 4209 4208 4212 2434 2270 4197 1901 1891 1883 315, 2554 2581, 2553 2517, 2595 2517, 2595 4578 4578 25702550 25702550 2540 2010 \$\frac{2}{\sigma} \text{25000 \$\frac{2}{\sigma} \text{2600 \$\frac{2}{ 10 K St 2501 1920 Rockridge Dr 2438 2489 2428 25932567 25432533 25-2458 4206 4199 4203 4375 24504380 2443 2443 2413 2435 2471 2660 2634 4682 4345 /2427 2431 2478 New soosymos 2475 2561 4390 5, 2496 4121 2487 2483 2479 2480 2478 2470 4131 4150 4154 4160 3869 4,165 4175 2594 25985,262 2536 2590 2755 2741 Sunseph439 (4130 Chiffling 264260) & 4188 2740 Ownhome 2675 2667 4249 4253 4226 / 3861 2498 2492 2488 2484 2484 4166 4176 Wanney St. 3849 3853 3865 2610 42254237 26254340 275027404592 4095 perations 1873 4475 M44212663 Z692_2680 2652 3922 3919 3924 3852 3909 3914 3856 2757, 2749₂₇₄₃, 4566 3841 2758 Lancaster 4092 4264 Works 2115 3848 4315 2673 4228 4015 / 4050 4225 26602650 3837 3852 1850 3829 2740 2690 4051 3842 1840 3832 /1830 3838 2109 3872 3832 4195 2781 2781 2785 2733 27 2708 2 4263 2794 - 1 1 1 6 4 2756 2738 2824 2792 2787 2787 2760 2095 4198 3828 3821 2080 2090 2096 18 NEMUJOS 3873 4194 2070 3913 2040 3863 2091 3817 3822 3903 2631 2794 4130 3810 3818 2050 4110 2060 3602 3808 2083 Fairhaven Dr 3804 2079 2073 prepared for, or be suitable for legal, engineering, or surveying purposes. Users of this infor 2063 2059 2057 Parker Rd 2067 3730 3750 4191 2921 2933 2130 2115 2105 2861 20.40 2821 2030 2050 2070 2060 2719 Z 2706 3945 386 2712 3933 2772 36563664 3672 3890. 300114 2037 649 2625 3659 3667 3675 2027 2730 3921 3004 3919 2057 2574 2800 2581 3470-M 2748 2575 2801 2570 DISCLAIMER: This product is for informational purposes and may not have been inn GIS (Geographic Information System) ManOptix 2756 3461 Gridler Ct Gatzeso M 2793 2551 2540 2550 2735 Barrington Dr. 3457 Depay Heno 2690 2541 3340 3355 2605 2521 2550 3365 · Lonings C. 2615 3555 3380 2530 3390 3389-M Gate 3375 2665 3415 2501 3570 3403 3365 3422 3465 3455 3055 3429 3459 3067 3437 3131 3445 8453 1451

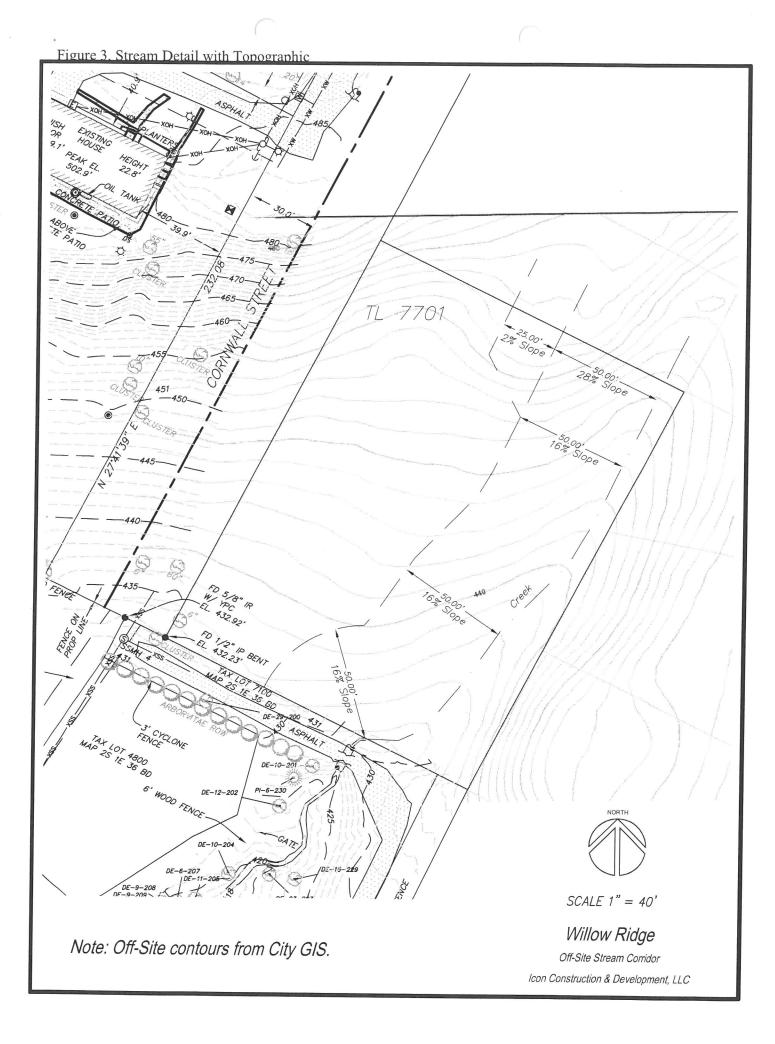
Figure 1. Metro HCA

Significant Riparian Goal 5

Metro Habitat Protection Published October 2005 Habitat Conservation







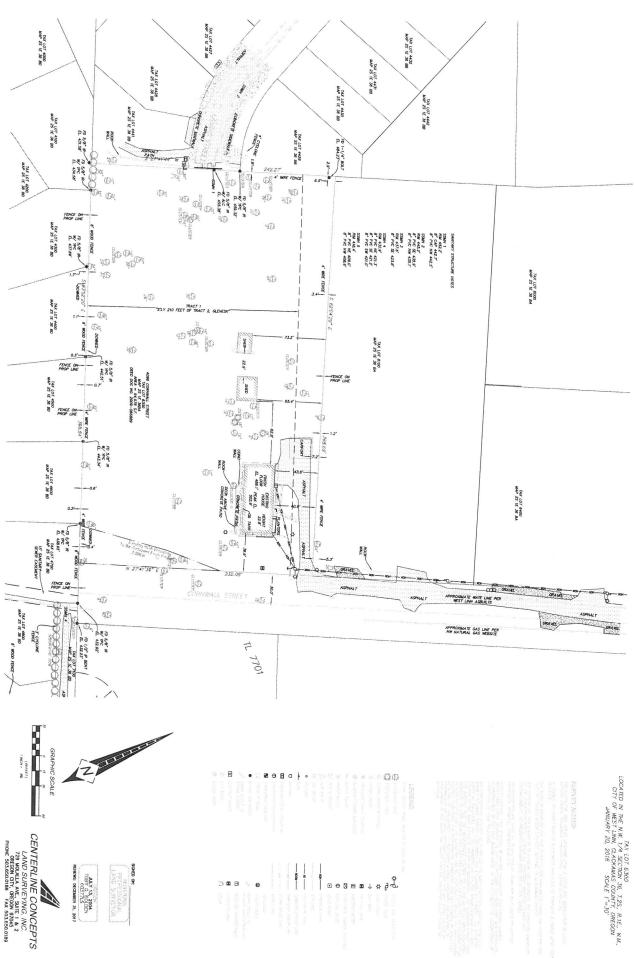


Figure 4. Overall Existing Conditions Map

LOCATED IN THE N.W. 1/4 SECTION 30, T.2S., R.TE., K.M., CITY OF WEST LINK (LACKAMAS COUNTY, OREGON JANUARY 20, 2016 SCALE ("m.30"

