

Memo

DATE: 10/09/2014

TO: Normal Neighborhood Plan Working Group

FROM: Brandon Goldman, Senior Planner

RE: Wetlands and Open space

Wetland Delineations:

In 2007 the City of Ashland completed and adopted a Local Wetland Inventory (LWI). The LWI includes all lands within the Urban Growth Boundary and was prepared to meet the Department of State Lands (DSL) Local Wetlands Inventory Standards and Guidelines (OAR 141-086-0180 through 141-086-0240). The LWI was submitted and approved by the Oregon Department of State Lands (DSL) and the Department of Land Conservation and Development (DLCD). The LWI and Ashland's Water Resource Protection Zone ordinance satisfy the statewide land use planning Natural Resources Goal (Goal 5) to provide protections for "significant" wetlands.

A Local Wetland Inventory is a systematic survey of an area to locate, map and describe the wetlands. The inventory was prepared using information sources such as aerial photos and soils maps and by conducting field observations. The wetland scientists that prepared Ashland's LWI (Fishman Environmental Services, a Division of SWC Environmental Consultants) collected data on the vegetation and soils to confirm that an area was or was not a wetland.

The primary purposes of the LWI are to provide information for long-range planning by the city, and to alert landowners to the probable wetlands on their property. Because the LWI maps the approximate wetland boundary, and may miss small wetlands, much more detailed field work is needed prior to site development.

Property owners in the plan area, Mahar Homes and Gil Livni, have presented to the Normal Neighborhood Plan Working Group preliminary wetland delineation maps that indicate wetland areas are smaller than those identified in the 2007 LWI. Although such preliminary delineations would require formal review and concurrence by DSL, the more general question posed is whether the proposed Open Space Area boundaries in the Draft Normal Plan should be subject to change to respond to formal wetland delineations as part of future development proposals. Simply put, a number of property owners have contended that if it is found a wetland area is smaller than currently shown in the LWI, than the corresponding Open Space Area should shrink to match the newly delineated area.



The Normal Neighborhood Plan's approach to the greenway and open space framework is establishing "Conservation/Openspace Areas" through a proposed amendment to the Comprehensive Plan Map. As proposed and as recommended by the Planning Commission these areas are intended to be preserved as natural areas or open space within the district which absent of any environmental constraints would provide recreational and view amenities to the districts residents. As such a reduction in the size of a Water Resource Protection Zome Area, even in cases where formal wetland delineation shows a smaller wetland area, would require a major plan amendment.

The 2014 Delineations provided by Mahar Homes, and Mr. Livni have been mapped to illustrate the differences between the Open Space Areas proposed in the Normal Neighborhood Plan, and the amended wetland boundaries shown in the two recent delineations. Three individual maps are attached:

- Map 1 shows the differences in Wetland areas between the 2007 Local Wetland Inventory and the 2014 Mahar/Livni Delineation
- Map 2 shows which lands are within Ashland's adopted Floodplain or are within designated riparian areas (40' from centerline of Cemetery Cr. Or Clay Cr.)
- Map 3 shows land areas previously identified as Conservation/Opensapce Areas in the Draft Normal Neighborhood Plan that would not be within a designated Water Resource Protection Zones per the Mahar/Livni Delineations.
 - Note these exclusion areas only include properties recently surveyed for wetlands. The large wetland on the GracePoint Church and Ashland School District property (W9) has not been recently delineated, however the property owners have indicated it too is smaller than what is represented on the 2007 LWI.
 - Acreage provided on this map shows the land area (per taxlot) that would presumably be developable were the Conservation/Open Space designations only apply to regulated water resource protection zone areas.

