SCHOTT & ASSOCIATES
Ecologists & Wetlands Specialists

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February 17, 2022

Jim Olson
12406 Waker Dr
Portland, OR 97229
503-956-2527
jnjolson888@gmail.com

Re: Wetland support for project site at NE Lake Dr, Lincoln City, Oregon (T7S, R11W, S11CD, TL 3900)

Dear Mr. Olson,

This memorandum is intended to accompany the "determination of no wetlands or other waters" report prepared for a portion of the above-referenced property by Schott & Associates (S&A) and approved by the Oregon Department of State Lands (DSL) in September 2021 (WD#2021-0340). Areas within the study site boundary did not meet the criteria for jurisdictional wetlands or other waters as defined by DSL or the federal Army Corps of Engineers (Corps). The study site boundary was intended to include all areas of permanent and temporary disturbance associated with the proposed project (area outlined in red in the attached map). The vegetation community within the study site was dominated by Himalayan blackberry (*Rubus armeniacus*), a common invasive shrub that was mowed to facilitate site access for the wetland study. Five native red alder (*Alnus rubra*) trees 6" or greater in diameter at breast height were present in the study site as shown in the attached map, a cluster of three in the northeastern portion of the site and two more in the center of the site. Invasive English ivy (*Hedera helix*) grew extensively over the cluster of three trees and the health of these trees has likely been compromised. The soils mapped onsite according to the USDA Soil Survey for Lincoln County were Fendall-Winema silt loams, a deep, well drained, non-hydric soil complex. Onsite soil samples were brown (10 YR 3/3 to 10 YR 3/4) in matrix color with no redoximorphic concentrations and did not meet hydric soil criteria. No wetland hydrological hydrology indicators were observed within the study site.

Just south of the study site boundary, palustrine scrub-shrub (PSS) wetland associated with Devil's Lake was present (boundary shown as blue line on attached map). This wetland boundary was delineated by S&A during onsite fieldwork according to methods described in the *Corps Wetland Delineation Manual* (Environmental Laboratory 1987) and the *Regional Supplement to the Corps of Engineers Delineation Manual: Western Mountains, Valleys, and Coast (Version 2)* (Environmental Laboratory 2010). The wetland area south of the study site was represented by Sample Plot 5 as shown on the attached map. It was vegetated by spiraea (*Spiraea douglasii*), willow (*Salix* sp.), invasive reed canarygrass (*Phalaris arundinacea*), and small-fruited bulrush (*Scirpus microcarpus*). The soil met

hydric soil criteria for depleted matrix and secondary wetland hydrological indicators were observed including geomorphic position, FAC-neutral test, and saturation visible on aerial imagery. Photos of the area were included in WD#2021-0340.

The delineated wetland was not included in the report submitted to DSL as it was not part of the proposed project site. Excluding the wetland from the study site saved considerable time and expense that would have been required to produce a formal wetland delineation report when the wetland could easily be avoided by the proposed project. Modifying the study site boundary to avoid the wetland was expressly permitted by DSL during correspondence with the regional Jurisdictional Coordinator who reviewed the determination report.

The study site as represented by the red outline does not appear to have any natural resource or wildlife habitat value or function as it currently exists. It contains no wetlands, waters or intact upland forest canopy and is vegetated predominantly by invasive species. Development of the site should not impact the wetland to the south or Devil's Lake provided appropriate erosion and sedimentation control measures are implemented during construction to avoid any discharge of materials into the wetland and lake.

Hopefully, this memorandum provides some clarity and insight into existing conditions of the project site. Please let me know if you have any additional questions.

Sincerely,

Kim Biafora
Wetland Ecologist & GIS Analyst
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Enclosure: Wetland Determination Map

Mapping Method and Precision Statement: The sample plots and study site boundary were recorded utilizing a Trimble Geo XT hand-held unit. GPS data were post-processed using Pathfinder Office software. GPS points averaged a horizontal accuracy of 0.1 feet.

Date: 2/17/2022

Data Source: ESRI, 2021; Lincoln County GIS Dept., 2021; DOGAMI, 2009

Wetland Determination Map

SCHOTT & ASSOCIATES, Inc.

NE Lake Drive Project Site: S&A # 2877

0 15 30 60 Feet