

Table 4: Options and Preliminary Recommendations Summary

Key Issues	OPTIONS			
	Existing Standards/Practices	A	B	C
1. CDC standards for proposed development within or near water-related Significant Natural Resources (SNRs) are subjective	In practice, typically rely on development conditions of approval from CWS and/or state and federal agencies to preserve water-related SNRs.	Continue to rely on review by CWS, state and federal agencies as well as CWS Design & Construction Standards to address water-related SNRs in the urban area; add new CDC reference to document this process.	Develop clear and objective CDC standards for proposed development within or near water-related SNRs that are based upon CWS <i>Design & Construction Standards</i> .	Develop clear and objective standards for proposed development within or near water related SNRs that expand on CWS <i>Design & Construction Standards</i> , and/or that apply to areas beyond CWS' Vegetated Corridor boundaries.
2. CDC standards for proposed development within or near Wildlife Habitat are subjective	In practice, rely on Habitat Report submitted as part of development application to address Wildlife Habitat protection and/or proposed mitigation. Discretionary and incentive-based design practices/ programs exist in CDC, but rarely used.	Continue to rely on existing discretionary and incentive based design practices/ programs for addressing <i>Wildlife Habitat</i> , while modifying the CDC to clarify the intent that such measures are voluntary.	Further develop/add new discretionary and incentive based programs for protection of <i>Wildlife Habitat</i> (e.g., Habitat Friendly Planned Development, density transfers, setback reductions). Modify CDC to clarify intent that measures are voluntary and add new programs.	Develop clear and objective standards for Wildlife Habitat protection (e.g., alternatives analysis, mitigation and criteria), in addition to Options A or B.
3. County's existing tree protection/ preservation requirements are limited	Apply existing, limited tree preservation and removal standards in CDC Section 407 and 422, including a description of trees, reason for removal, and explanation of any alteration to flood plain or drainage hazard areas.	Continue with current process.	Develop more extensive tree protection/ preservation requirements for trees within County designated SNRs.	Develop more extensive tree protection/ preservation requirements applicable to all trees potentially affected by new development applications within the urban area, with prioritization for tree protection in SNR areas.
4. Standards and protections for SNRs and trees in UGB expansion areas are limited	Apply existing, limited tree preservation and removal standards in CDC Section 407 and 422 to UGB expansion areas once included in an urban community plan. Apply requirements of Section 422 to new development within an SNR, as identified in the RNRP.	Continue with current process for SNRs. Apply County's existing and (any new tree) protection/preservation requirements.	Continue with current process for SNRs. Apply County's existing (and any new) tree protections within UGB expansion areas, and expand their application to Upland Habitat and <i>Riparian Corridors</i> shown on Metro's Inventory.	Continue with current process for SNRs. Apply County's existing (and any new) tree protections within UGB expansion areas to SNRs as identified by the city during its comprehensive planning process.
5. The County's Goal 5 resources inventory is dated	Rely on existing Goal 5 inventory and RNRP and community plan maps, with field verification by development applicants.	Continue to use existing SNR maps for identifying SNRs with field verification by development applicants.	Update SNR maps to reflect changes since adoption, including results of land use reviews and changes due to annexations and right-of-way dedication.	Update Goal 5 inventory to reflect changes on the ground and technological mapping advances (e.g., LIDAR) since the last inventory. New Goal 5 process for any new areas added to the inventory.
6. Tracking of field verified SNR delineations and monitoring of mitigation is inconsistent.	No tracking of field verified SNR delineations. Rely on CWS for monitoring of mitigation near water- related SNR and erosion control measures in CWS urban service area	Start new database of mitigated or protected SNRs and ongoing conditions of approval for monitoring and enforcement.		
7. County submittal requirements for SNR impacts and Habitat Reports lack specificity	1998 Director's Interpretation guides requirements for submittal and Habitat Reports for development applications on sites with SNRs.	Standardize submittal and Habitat Report requirements and codify them in the CDC.		
8. SNR categories vary across jurisdictions, causing inconsistencies and confusion	County's SNR categories in Section 422 are titled and described differently compared to state, Metro and other agencies.	Modify Significant Natural Resource categories and definitions used by the County for clarity and regional consistency		

Preliminary Staff Recommended Option is indicated with light blue shading

Table 5: Detailed Analysis of Options and Preliminary Recommendations

Key Issues	OPTIONS			
	Existing Standards/Practices	A	B	C
1. CDC standards for proposed development within or near water-related Significant Natural Resources (SNRs) are subjective	In practice, typically rely on development conditions of approval from CWS and/or state and federal agencies to address water related SNRs.	Continue to rely on review by CWS, state and federal agencies as well as CWS <i>Design & Construction Standards</i> to address water-related SNRs; add new CDC reference to document this process.	Develop clear and objective CDC standards for proposed development within or near water related SNRs that are based upon CWS <i>Design & Construction Standards</i> .	Develop clear and objective standards for proposed development within or near water related SNRs that expand on CWS <i>Design & Construction Standards</i> and/or that apply to areas beyond CWS' Vegetated Corridor boundaries.
Assessment	<p>LUT currently relies on CWS to apply its <i>Design & Construction Standards</i> to address stream water quality and riparian corridor conditions. Habitat assessment provided to LUT is similar to that provided to CWS for its Environmental Review.</p> <p>LUT depends on CWS review and expertise and typically uses this analysis to address CDC Section 422- 3.3 and -3.4, the riparian corridor standards. CWS recommends conditions of approval that reflect mitigation and enhancement requirements for the Vegetated Corridor, the area adjacent to the stream or water area.</p> <p>LUBA found riparian corridor standards of Section 422-3.3 and -3.4 unenforceable because they were not clear and objective.</p>	<p>This option would add provisions to the CDC that reference CWS, DSL, Army Corps and potentially other agencies' requirements. It would require adherence to CWS <i>Design & Construction Standards</i> for conditions, mitigation and enhancement of riparian and Vegetated Corridors (as a proxy for the County's water-related SNRs).</p> <p>Strengths</p> <p>Easy to adapt for staff and applicants.</p> <p>Reflects clear and objective standards already in place to address water related SNRs and riparian corridors.</p> <p>Meets Metro's UGMFP Title 13 and complies with Tualatin Basin Program decisions.</p> <p>Similar to other Tualatin Basin jurisdictions, so provides continuity for developers.</p> <p>Less overlap with other agency's submittal information, standards and review processes.</p> <p>CWS oversight of enhancement and mitigation plan review and monitoring, rather than County staff.</p> <p>Also addresses riparian corridors and sensitive areas not currently included in County's identified water-related SNRs.</p> <p>Weaknesses</p> <p>CWS focus is on stream health, not protection of SNRs, though actions to protect stream health also preserve resources.</p> <p>County would not have primary oversight of water-quality conditions, or discretion to make changes to CWS' conditions of approval.</p>	<p>This option would add standards that moderately restrict development in the water related SNRs, identify location, enhancement, mitigation and monitoring based on the CWS standards.</p> <p>Strengths</p> <p>Consistent and reliable standards.</p> <p>Ensures application of CWS standards is not considered a land use decisions.</p> <p>Directly addresses LUBA <i>Warren</i> decision.</p> <p>Opportunity for applicants and community to address standards during land use review process.</p> <p>Weaknesses</p> <p>Redundant with CWS standards.</p> <p>Could result in conflicts if not updated at same time. Would require ongoing updates to remain consistent.</p> <p>Would require technical expertise to develop standards, including participation by CWS.</p> <p>Additional County staff expertise in natural resources required to address conditions for land use review and monitoring.</p> <p>May add delay or uncertainty in land use review process if there are deviations from CWS' recommended conditions of approval.</p>	<p>Currently, CWS standards moderately restrict development in the Vegetated Corridor, but do allow mitigation and enhancement in certain circumstances. This option could include extending the riparian corridor a certain distance beyond CWS' requirements or further prohibiting rather than limiting resource impacts.</p> <p>Strengths</p> <p>Consistent and reliable standards.</p> <p>Directly addresses LUBA <i>Warren</i> decision.</p> <p>Weaknesses</p> <p>May conflict with CWS standards.</p> <p>Would require technical expertise to develop standards, including participation by CWS.</p> <p>Most other Tualatin Basin area jurisdictions don't go beyond CWS' requirements. Unsure what additional requirements might be warranted beyond current standards.</p> <p>Staff is not aware of community concerns on adequacy of water related SNR protections.</p> <p>Since CWS' standards are already more restrictive than Metro's Title 3 standards²⁴, additional requirements would be hard to justify or enforce.</p> <p>Additional staff expertise, oversight and monitoring would be required.</p> <p>New CFP policies would need to be adopted to provide policy basis for CDC requirements.</p> <p>Could result in less land being available for housing development inside UGB.</p> <p>Staff does not recommend this option</p>

²⁴ Metro Resolution No. O5-3577, Staff Report Approving the Tualatin Basin Natural Resources Coordinating Committee's Fish and Wildlife Habitat Protection Program page 3

Preliminary Staff Recommended Option is indicated with light blue shading

Key Issues	OPTIONS			
	Existing Standards/Practices	A	B	C
2. CDC standards for proposed development within or near <i>Wildlife Habitat</i> are subjective	In practice, rely on Habitat Report submitted as part of development application to address <i>Wildlife Habitat</i> protection and/or proposed mitigation. Discretionary and incentive based design practices/ programs exist in CDC, but rarely used.	Continue to rely on existing discretionary and incentive based design practices/ programs for addressing <i>Wildlife Habitat</i> , while modifying the CDC to clarify the intent that such measures are voluntary.	Further develop/add new discretionary and incentive based programs for protection of <i>Wildlife Habitat</i> (e.g., Habitat Friendly Planned Development, density transfers, setback reductions). Modify CDC to clarify intent that measures are voluntary and add new programs.	Develop clear and objective standards for <i>Wildlife Habitat</i> protection (e.g., alternatives analysis, mitigation and criteria), in addition to Options A or B.
Assessment	<p>In 2005, the County approved voluntary measures to incentivize and encourage greater protections for SNRs outside the water related habitat areas.</p> <p>Applicants may vary/reduce County standards to minimize or reduce impacts to <i>Wildlife Habitat</i> areas by applying mitigation measures such as density transfers, setback reductions, and low impact development techniques.</p> <p><i>Wildlife Habitat</i> areas are identified on community plan and RNRP maps which are then field verified through land use review process and their value determined through Habitat Report process, without clear and objective standards in the CDC.</p> <p>LUBA found <i>Wildlife Habitat</i> standards of Section 422-3.6 unenforceable because they were not clear and objective.</p>	<p>The Tualatin Basin Program <u>encourages</u>, but does not <u>mandate</u>, protection or mitigation for development impacts to <i>Wildlife Habitat</i> outside Metro’s Class I and II Riparian areas (similar to Vegetated Corridors). Development affecting <i>Wildlife Habitat</i> may use the incentives already included in the CDC as part of the County’s Goal 5 program.</p> <p>Strengths Meets Metro’s UGMFP Title 13 and complies with Tualatin Basin Program decisions.</p> <p>Easy to adapt for staff and applicants</p> <p>Does not require development of new CDC standards or Goal 5 policies to address <i>Wildlife Habitat</i>.</p> <p>Staff would not need special expertise to review or evaluate Habitat Report.</p> <p>Weaknesses Voluntary measures have been in place for many years, and have not often been used as a strategy to protect additional <i>Wildlife Habitat</i>.</p> <p>Does not address community concern for increased <i>Wildlife Habitat</i> preservation beyond current protections in place for water-related SNRs.</p> <p>Developers may not take advantage of voluntary measures because of perceived risks or insufficient value of incentives.</p>	<p>This option would allow applicants greater flexibility in dimensional or design standards with the trade-off of increased habitat protection/ environmentally sensitive design. A Habitat Friendly Planned Development could be developed to preserve/expand/enhance identified natural resource areas, particularly <i>Wildlife Habitat</i>.</p> <p>Provides the opportunity to assess resources, evaluate trade-offs and prioritize the natural resource areas that would receive the most protection through voluntary discretionary incentives. One possible incentive could be the use of public funds to acquire particular identified SNRs during the land use review process.</p> <p>Strengths Meets Metro’s UGMFP Title 13 and complies with Tualatin Basin Program decisions.</p> <p>Would provide clearer requirements for applicants to follow, but would also provide flexibility to address individual site conditions.</p> <p>More <i>Wildlife Habitat</i> could be retained with incentives or a Planned Development.</p> <p>Weaknesses May not be used unless incentives are meaningful to development community.</p> <p>May not fully address community concern for increasing protection of wildlife habitat not otherwise protected.</p> <p>To be most effective, this option may need to be paired with other options, including increased tree protection/preservation.</p>	<p>Standards could be adopted that limit development of <i>Wildlife Habitat</i> under clearly defined and specific circumstances, or require submittal of an alternatives analysis for mitigation areas.</p> <p>Strengths Consistent and reliable standards.</p> <p>Directly addresses LUBA <i>Warren</i> decision.</p> <p>Could address some community members’ desire for increased protection of <i>Wildlife Habitat</i> impacted by development, depending on the policy choices made and standards adopted.</p> <p>Community participation in the Goal 5 process and reflection of current values for habitat protection.</p> <p>Weaknesses Would be costly and time intensive, requiring technical expertise, and extensive stakeholder and community process to develop standards.</p> <p>Would require some level of Goal 5 analysis, understanding of the desired values to be protected, and likely adoption of new policies.</p> <p>Likely that some community members, experts, and development community would disagree on appropriate standards.</p> <p>May be contrary to Tualatin Basin program determinations (focus on protecting riparian corridors, do not further inhibit development on sites with identified upland (wildlife) habitat, but instead establish incentives to encourage greater habitat protection.)</p> <p>Other methods may be more effective in preserving the value of <i>Wildlife Habitat</i> areas (e.g., tree protection regulations).</p> <p>Staff does not recommend this option.</p>

Key Issues	OPTIONS			
	Existing Standards/Practices	A	B	C
3. County's existing tree protection/preservation requirements are limited	Apply existing, limited tree preservation and removal standards in CDC Section 407 and 422, including a description of trees, reason for removal, and explanation of any alteration to flood plain or drainage hazard areas.	Continue with current process.	Develop more extensive tree protection/preservation requirements for trees within County designated SNRs	Develop more extensive tree protection/preservation requirements applicable to all trees potentially affected by new Type II and III development applications within the urban area, with prioritization for tree protection in SNR areas.
Assessment	CDC Section 407-3 requires a property owner to obtain a permit to remove a tree in an existing SNR, flood plain or drainage hazard area and provides for a certain percentage of the trees to be retained if the sole purpose is for commercial cutting. Existing tree removal permitting requirements allow staff to review tree location, the SNR criteria and reason for removal.	<p>Existing tree preservation and removal standards are minimal but do exist and do apply to trees within SNRs, floodplain and drainage hazard areas.</p> <p>Strengths Easy to adapt for staff and applicants</p> <p>Weaknesses Would not address concerns with development impacts to existing trees expressed by some community members.</p> <p>Tree removal permits are required, but there are many exceptions and limitations so very few tree removal permits are reviewed by County staff.</p> <p>Process refers to Section 422 criteria which are not clear and objective and difficult to administer separate from land use review.</p> <p>Some private property owners may not know that their property has SNRs, and therefore do not obtain County tree removal permit.</p>	<p>Under this option, clear and objective standards related to impacts to existing trees within identified SNR areas would be developed. An assessment of the size, type, quality or quantity of trees on site and proposed impacts from development would be required. Standards would address limitations on impacts, potential mitigation for tree removal, and other aspects. Could include incentives for protecting trees, fee in lieu, and off-site mitigation.</p> <p>Strengths Would address a primary community concern with development impacts to trees in <i>Wildlife Habitat</i> areas.</p> <p>Process could dovetail with changes to current Habitat Report requirements and review.</p> <p>Longtime community interest in development of tree protection regulations.</p> <p>Tree removal and protection standards have been adopted in other local communities and developers have become familiar with these standards for new developments.</p> <p>Weaknesses Potentially intensive staff and consultant effort to develop regulations and standards.</p> <p>Additional staff, and/or development of staff expertise may be required.</p> <p>Monitoring of mitigation conditions would be required to ensure trees continue to thrive.</p> <p>Depending on the extent of the rules, may result in need for additional code enforcement staff.</p> <p>The scope of this effort would need to be further defined prior to moving forward, if this option were selected.</p>	<p>This option would expand tree protection/preservation regulations to new development more broadly, regardless of whether the development site contains SNRs.</p> <p>Strengths Longtime community interest in development of tree protection regulations.</p> <p>Tree removal and protection standards have been adopted in other local communities and developers have become familiar with these standards for new developments.</p> <p>Would provide additional protections for trees, without need to go through for Goal 5 process.</p> <p>Environmental benefits of increased tree canopy.</p> <p>By addressing all existing trees on development sites, may reduce community pressure to update the Goal 5 Inventory and assessment of <i>Wildlife Habitat</i> as a natural resource.</p> <p>Clear and objective criteria would be easier to develop and less subjective than <i>Wildlife Habitat</i> criteria or standards and review.</p> <p>Weaknesses Intensive staff and likely consultant effort to develop regulations and standards.</p> <p>Additional staff, and/or development of staff expertise would be required.</p> <p>New requirement. Costs for permitting may increase.</p> <p>Monitoring of mitigation conditions would be required to ensure trees continue to thrive.</p> <p>The scope of this effort would need to be further defined prior to moving forward, if this option were selected.</p>

Preliminary Staff Recommended Option is indicated with light blue shading

Key Issues	OPTIONS			
	Existing Standards/Practices	A	B	C
4. Standards and protections for SNRs and trees in UGB expansion areas are limited	Apply existing, limited tree preservation and removal standards in CDC Section 407 and 422 to UGB expansion areas once they are included in an urban community plan. Apply requirements of Section 422 to new development within an SNR, as identified in the RNRP.	Continue with current process. Apply County's existing (and any new) tree protection/preservation requirements.	Continue with current process for SNRs. Apply County's existing (and any new) tree protections within UGB expansion areas, and expand their application to Upland Habitat and Riparian Corridors shown on Metro's Inventory.	Continue with current process for SNRs. Apply County's existing (and any new) tree protections within UGB expansion areas to SNRs as identified by the city during its comprehensive planning process.
Assessment	<p>As land is added to the UGB, County transfers the areas to an urban community plan and applies an interim urban land use designation (FD-20). Any mapped SNRs from the Rural Natural Resource Plan maps are transferred to the Community Plan SNR map.</p> <p>Section 421 and 422 requirements apply to any new development within a floodplain/drainage hazard area or SNR. Section 407-3 requires property owners to obtain a permit to remove trees within an existing SNR area. For commercial cutting within the UGB, this section requires selective cutting and the retention of a certain number and distribution of trees and representative proportion of species.</p> <p>Existing tree removal permitting requirements offer limited alternatives for tree retention or mitigation if trees are removed by property owners, even without a pending land use review application.</p>	<p>Continue with existing process of adding County identified SNRs to community plans when UGB expansions occur, and applying requirements of CDC Sections 421 and 422 to any development within a floodplain/drainage hazard area or SNR. Apply existing limited tree protections in CDC Sections 407 and 422. Commercial cutting would continue to be regulated by ODF.</p> <p>Apply any new tree protection/preservation requirements developed County wide to UGB expansion areas until the area annexes to a city.</p> <p>Strengths Easy to adapt for staff and applicants.</p> <p>May encourage city to move forward with annexations to ensure greater protections.</p> <p>Each city with a UGB expansion has the ability to develop individual natural resource protection programs based on their community standards.</p> <p>Weaknesses Would not provide additional protections for trees or other resources in new UGB areas until/unless new tree protection/preservation requirements are adopted.</p> <p>CWS requirements only apply after city annexation occurs, therefore Vegetated Corridors (yet to be delineated) may be impacted by tree removal.</p> <p>Some natural resources may be removed due to commercial cutting prior to city annexation.</p> <p>County SNR mapping in the UGB expansion areas is limited and doesn't include <i>Wildlife Habitat</i>.</p>	<p>Add County identified SNRs as well as resources included in Metro's Natural Resource Inventory Map to community plans when UGB expansions occur. This would add Upland (<i>Wildlife</i>) Habitat areas within the former rural area that are outside the original County inventory.</p> <p>Apply voluntary/incentive based measures to new development that may impact Upland (<i>Wildlife</i>) Habitat areas. Apply existing limited tree protections in CDC Sections 407 and 422 and any new County-wide tree protection standards to these areas.</p> <p>Strengths Easy to adapt for staff and applicants.</p> <p>Would apply County SNR and tree protections to areas identified as Upland (<i>Wildlife</i>) Habitat by Metro, as requested by several cities.</p> <p>Weaknesses New development is limited within the FD-20 district, so commercial logging may still occur and only moderately affect the number of trees remaining on these sites regardless of new requirements.</p> <p>Not within CWS service boundary until city annexation, therefore, County would have to administer limited County regulations for riparian corridors.</p> <p>Would be most effective if adopted along with additional tree protection/preservation requirements.</p>	<p>Until city planning processes are complete, adopt County SNR maps and apply existing regulations. Apply new tree protection regulations should they be adopted.</p> <p>Once city planning processes are complete and new natural resource areas are identified, adopt these areas into the County's plans and apply County tree protections to those areas. ESEE analysis will be done by the cities as they develop comprehensive plans for these areas.</p> <p>Strengths Easy to adapt for staff and applicants.</p> <p>Would promote preservation of trees within areas identified by the community as significant natural resources prior to annexation.</p> <p>Weaknesses Has not been done in the past.</p> <p>City resource categories and desired levels of protection may not match those of the County.</p> <p>Would require coordination with cities, and intergovernmental agreements on how implementation would occur.</p> <p>Could increase needs for code enforcement.</p> <p>Would be most effective if adopted along with additional tree protection/preservation requirements.</p>

Key Issues	OPTIONS			
	Existing Standards/Practices	A	B	C
5. The County’s Goal 5 resources inventory is dated	Rely on existing Goal 5 inventory and RNRP and community plan maps, with field verification by development applicants.	Continue to use existing SNR maps for identifying SNRs, with field verification by development applicants.	Update SNR maps to reflect changes since adoption, including results of land use reviews and changes due to annexations and right-of-way dedication.	Update Goal 5 inventory to reflect changes on the ground and technological mapping advances (e.g., LIDAR) since the last inventory. Conduct new Goal 5 process for any new areas added to the inventory.
Assessment	<p>The current SNR inventory was based on data collected between 1979 -1983 using the best available information at the time. The habitat assessment process requires field verification of the existence, extent and quality of the resources.</p> <p>County record keeping does not distinguish development proposals with natural resources</p>	<p>The current SNR maps were developed based on the best available information and data at the time. The expectation in County regulations is that field verification by a qualified professional is required to locate the resources at the site level, and delineate and assess them.</p> <p>Strengths Easy to adapt for staff and applicants</p> <p>Developing a system that works moving forward may be a better use of limited resources.</p> <p>Weaknesses Mapped locations of SNRs are generalized representations, which is often confusing and frustrating to community members.</p> <p>Accuracy of field verification by consultants hired by a developer is sometimes questioned by community members.</p>	<p>To achieve a more up-to-date inventory based on current mapping but reflecting changes since adoption, the County could undertake an effort to “remove” the natural resource mapped areas that are no longer within the County’s regulatory purview for land use review. This would include areas:</p> <ul style="list-style-type: none">• preserved through land use review,• approved for development,• annexed to cities,• included in road right-of-way dedications <p>This option could improve accuracy of mapped SNRs that have been affected by development and provide insights into past application of regulations. It would not improve the accuracy of any mapping of SNRs that have not been impacted in some way by development.</p> <p>Strengths May result in areas being added to the maps that may have been missed in the SNR inventory or inaccurately assessed as data was digitized.</p> <p>Weaknesses County record keeping does not specifically track applications with SNRs. Significant time and effort would be necessary to locate and review case files. Information is inconsistent and often limited.</p> <p>Some of this analysis could be done through GIS, while the remainder would be a staff intensive exercise involving research on past development projects, recorded private conservation easements and other conditions of approval.</p> <p>Community plan SNR maps would need to be updated via ordinance to illustrate the changes, and some reclassifications might be needed.</p> <p>Staff does not recommend this option.</p>	<p>An update of water related natural resources (streams and corridors) could be done with current GIS data and limited research. This might include topographic data from LiDAR and other more recent sources. Some interpretation would be required. A similar time, resource, and controversy intensive multi-year process was recently undertaken by the Federal Emergency Management Agency (FEMA) for floodplains.</p> <p>Strengths Would improve accuracy of the mapped natural resource areas.</p> <p>Weaknesses Major investment in staff time and resources. Site visits and a public process would be required to verify the information on the maps.</p> <p>Challenging, controversial and expensive undertaking.</p> <p>The community plan SNR Maps would need to be updated via ordinance to illustrate the changes, and some reclassifications might be needed.</p> <p>Five step Goal 5 process, including ESEE analysis, would be required for new areas added to the inventory.</p> <p>This level of accuracy is not necessary to review land use submittals since the same updated sources are available to consultants preparing habitat assessments. Habitat assessments are verified by staff and ultimately reflect the most accurate natural resources site conditions.</p> <p>On balance, updating the natural resources inventory does not appear to be the best use of staff time and County resources.</p> <p>Staff does not recommend this option.</p>

Key Issues	OPTIONS	
	Existing Standards/Practices	Recommendation
6. Tracking of field verified SNR delineations and monitoring of mitigation is inconsistent.	Habitat Reports delineating SNRs are kept in project files, but are not entered into a database. Rely on CWS for monitoring of mitigation near water- related SNR and erosion control measures in CWS urban service area.	Start new searchable database of mitigated or protected SNRs and ongoing conditions of approval for monitoring and enforcement.
Assessment	<p>Once SNR delineations are field verified in Habitat Report and any conditions are placed on development applications, the location of the field verified resources is not placed in a database or otherwise tracked. LUT staff verifies that all SNR conditions are met and CWS verifies that their water-related are met, prior to final development approval.</p> <p>After construction, Code enforcement responds to complaints on sites with SNRs. If complaint is received, staff reviews case files to see whether the site contains SNRs and if there are relevant conditions of approval to determine if a violation has occurred. Little tracking or monitoring of the conditions of approval subsequent to occupancy unless complaint received.</p>	<p>The County could improve and standardize how it collects and documents natural resource information in the future and maintain records on where the natural resources are located and the outcomes of land use decisions. Applicants could be required to provide the mapped location of the site’s natural resources geospatially so that the County can track and monitor the natural resources after the land use approval process. A new data layer that connects case file references with SNR and all specific conditions of approval could be added to GIS to assist with tracking.</p> <p><u>Strengths</u> Easier to track existing conditions of approval and monitor compliance if protected tracts are identified.</p> <p><u>Weaknesses</u> Would add some costs for staff time and resources.</p>
7. County submittal requirements for SNR impacts and Habitat Reports lack specificity	1998 Director’s Interpretation guides require-ments for submittal and Habitat Reports for development applications on sites with SNRs.	Standardize submittal and Habitat Report requirements and codify them in the CDC.
Assessment	These requirements are not codified in the CDC.	<p>Could include:</p> <ul style="list-style-type: none">▪ Codifying qualification requirements for applicants’ natural resource scientist/ biologist.▪ Developing scientifically valid and standardized wildlife assessment forms that address clear and objective criteria.▪ Requiring clear site plans with field verified location of natural resources, including common categories and terms.▪ Clarifying in the CDC that SNR locations need to be field verified. <p><u>Strengths</u> Would result in consistency in information submitted to the County, which would assist staff in reviews, developers and consultants in understanding expectations and preparing materials, and community members in reviewing and comparing projects.</p> <p><u>Weaknesses</u> May require consultant assistance (and therefore additional funding) to develop appropriate materials.</p>

Key Issues	OPTIONS	
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8. SNR categories vary across jurisdictions, causing inconsistencies and confusion	County’s SNR categories in Section 422 are titled and described differently compared to the state, Metro and other agencies.	Modify Significant Natural Resource categories and definitions used by the County for clarity and regional consistency.
Assessment	County’s SNR categories for fish and wildlife related natural resources are described imprecisely and have different titles compared to other agencies. Applicants must identify and address multiple resources categories in the approval process for each jurisdiction or agency.	<p>Could include adopting the terms used by other jurisdictions, combining categories, or refining the terms and/or definitions. A process to develop the categories would include comparison of definitions and coordination with other jurisdictions.</p> <p>Strengths Would result in consistency across jurisdictions and less confusion for staff, the public and developers.</p> <p>Weaknesses May not be possible to do, given the categories are all slightly different and are used for different purposes.</p>