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## PACIFIC HABITAT SERVICES, INC

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**Date:** October 31, 2023

**To:** Jim Wheeler, Development Planning Manager  
City of Gresham

**From:** John van Staveren, SPWS

**Re:** Veranda Subdivision – Wetland 1

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I am a Senior Professional Wetland Scientist with 35 years of wetlands consulting experience. I have been a member of five technical advisory committees regarding wetlands policy in Oregon and I am considered a wetland subject matter expert for Governor Kotek's Housing Production Advisory Council.

I was a member of the committee tasked with creating the criteria for designating locally significant wetlands for purposes of protection through Statewide Planning Goal 5. The 1995 Oregon legislature directed the Department of State Lands to develop the criteria, a committee was formed, and in January 1997, the Land Board adopted our criteria for assessing Locally Significant Wetlands (OAR 141-86-350).

Like all Oregon jurisdictions, the City of Gresham is required to assess whether wetlands are locally significant. If a wetland meets just one of the approved criteria, it is significant. The fact that only one criterion is met has no bearing on the overall quality of the wetland. It is considered to provide a function that rises to the level of protection.

As you have already seen, the significant wetland criterion that is the focus of Wetland 1 within the proposed Veranda subdivision is the following:

*The wetland or a portion of the wetland occurs within a horizontal distance less than one-fourth mile from a water body listed by the Department of Environmental Quality as a water quality limited water body (303(d) list), and the wetland's water quality function is described as "intact" or "impacted or degraded" using OFWAM. The 303(d) list specifies which parameters (e.g., temperature, pH) do not meet state water quality standards for each water body. A local government may determine that a wetland is not significant under this subsection upon documentation that the wetland does not provide water quality improvements for the specified parameter(s).*

The significant wetlands criteria committee recognized that wetlands could have a beneficial impact on improving the quality of water in Oregon's streams. As such, we chose to designate as

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significant those wetlands that provide a water quality benefit and are situated relatively close (i.e., within ¼ mile) to streams that are listed by DEQ as water quality limited. Kelley Creek is a 303(d) listed stream for temperature. This means that DEQ considers the water in the creek too warm and requires the City to implement measures to reduce stream temperatures to support habitat for cold-water fish, such as salmon.

As Walt Burt, Principal Hydrogeologist with GSI Water Solutions summarizes in his memorandum, Wetland 1 provides a water quality benefit to Kelley Creek by providing a source of cold groundwater that reduces stream temperatures. As Wetland 1 contributes groundwater to the creek, the criterion cited above is satisfied and the wetland is locally significant. The City is obligated to protect the wetland because of this designation.