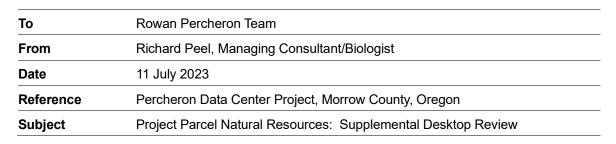
Telephone: +1 503 488 5282 www.erm.com

#### Memo





This technical memorandum responds to questions the Rowan Percheron Team received from the Morrow County (County) Planning Commission regarding the Project Parcel site conditions and natural resource values. Specifically, this memo addresses (1) the suitability of the site as wintering range and general habitat for deer and elk species, and (2) the extent and duration of wetland and stream hydroperiods within the site as they pertain to buffers.

### **EXECUTIVE SUMMARY**

Although the site provides potential grazing and foraging habitat for deer and elk species, the site is located over 20 miles from mapped wintering grounds and is likely not significantly utilized for overwintering habitat.

Delineated wetland and water features identified on site have hydroperiod limited to the delineated boundaries and minimal influence into the surrounding uplands. This suggests that a standard buffer is sufficient to protect these features and any associated riparian habitat.

#### SITE DESCRIPTION

The Project Parcel is located approximately 11 miles southwest of Boardman, Oregon. The site is in the Columbia Plateau ecoregion and contains sections of mapped grassland and wetland strategy habitat. Biological field observations were collected by Senior ERM Biologist, Richard Peel as part of targeted species survey. Field observations were completed in ideal weather on March 2<sup>nd</sup>, April 6th, and April 28th, 2023. Wetland delineations were completed by a third party and are detailed in section 2. The site was observed as characterized grassland/shrub steppe community, comprised of sagebrush, grasses, and other shrub species.

#### 1. DEER AND ELK HABITAT SUITABILITY

The County maps important big game range and habitat under Goal 5 of its Morrow County Comprehensive Plan (MCCP). Oregon Department of Fish and Wildlife (ODFW) maps important big game range and habitat under its Habitat Mitigation Policy (OAR 635-415). The Project Parcel is not designated as being within a big game winter range or mapped as essential and limited protected habitat under either MCCP Goal 5 or the ODFW Habitat Mitigation Policy. The site is located in the northeast section of ODFW's big game management unit that covers the Columbia Basin through the Blue, Wallowa and Elkhorn mountains to Hells Canyon. Big game managed in this unit include black-tailed deer, mule deer, white-tailed deer, and elk.

Exhibit 61 4884-7799-4352v.1 0120917-000001

The site contains sagebrush, grasses, and other shrub species along with wetlands and riparian habitat that may be suitable for deer or elk foraging. The onsite wetlands will remain and be avoided. Based on desktop and onsite observations, the site supports fragmented areas of grassland habitat, identified by ODFW as a Strategy Habitat. Grasslands provide habitat for multiple species including large ungulates and are often associated with rare and important plant species. In accordance with the habitat categories and mitigation strategies defined by ODFW, the habitat onsite is likely category 5 or 6 due to the exclusion of essential, or important and limited habitat from the project area.

Additionally, ODFW identified deer and elk wintering range is mapped approximately 20 miles south of the site boundaries (Attachment A), making the site an unlikely candidate for overwinter utilization. Although deer species have been observed on site, the utility of the site is likely limited to growing season browsing and grazing use.

### 2. WETLAND BOUNDARIES AND RIPARIAN CORRIDORS

One palustrine emergent/palustrine forested (PEM/PFO) wetland (Wetland A) and one intermittent drainage (Intermittent Water 1) was delineated by AKS in 2022. The Oregon Department of State Lands (DSL) concurred that Wetland A and Intermittent Water 1 are likely jurisdictional waters of the state. This delineation is in concurrence with previous wetland delineation studies completed onsite in 2009, 2012, and 2013. Data was collected throughout the wetland, intermittent waterway, and upland sections of the site. Delineation data was reviewed by Professional Wetland Scientist, Richard Peel.

The riparian habitat is commonly defined as the interface or ecotone between a stream feature and the area surrounding the features banks. The riparian influence from the intermittent water on site is likely limited to Wetland A. Additionally, data collected within, and immediately outside the wetland boundary (Sampling points 9 and 10) suggests that the hydroperiod of Wetland A is highly localized with the delineated boundary. This suggests that the hydrology of the wetland and riparian influence of the water body does not extend significantly beyond the delineated boundaries. Additionally, data from within the identified 100-year floodplain (Sample point 3 and 4) show no signs of hydrologic influence in the soil, suggesting no significant hydroperiod and no flooding duration. A review of the collected data suggests little influence from the water features to the surrounding uplands and supports that standard wetland buffers are sufficient to avoid impacts to the delineated features.

4884-7799-4352v.1 0120917-000001 Exhibit 61
Page 2 of 4

# COMPASS

DATA ACTIVE TOOLS LEGEND

## ODFW DEER WINTER RANGE (EASTERN OR)

ODFW Deer Winter Range

ODFW Deer Winter Range

# ODFW ELK WINTER RANGE (EASTERN OR)

ODFW Elk Winter Range

ODFW Elk Winter Range



Exhibit 61

Page 3 of 4









Wildlife, ODFW

Sources: Esri, 1-cubed, USDA, USGS, AEX, GeoEye, Getmapping, Aerogrid, IGN, IGP, UPR-EGP, and others: Oregon Department of Fish and

