

EXHIBIT R

NWMC REPAIR - Review for Consistency with

Critical Areas Ordinance (PTMC 19.05)

(File No. LUP23-023 and LUP23-024)

According to the City’s Critical Area (CA) maps, the site site/immediate vicinity is mapped:

- a. Aquifer Recharge – The proposal is not a regulated development in terms of aquifer recharge; no action is required.
- b. Seismic/Liquefaction susceptibility/Tsunami Inundation – No new structures are proposed; no action is required.
- c. Frequently Flooded Area: FEMA Special Flood Hazard Area (SFHA): Zone AE
BFE=13
- d. Fish and Wildlife Habitat

Following is staff’s analysis of the project’s compliance with applicable critical areas performance standards.

19.05.060	General Performance Standards
A. Avoiding Impacts	The applicant has submitted a Geologic Report (Exhibit G) demonstrating that the actions are necessary and are the least environmentally damaging practicable alternative. The proposal uses “soft” stabilization in lieu of “hard” structural methods. Overall, it is a low impact solution to erosion when compared to a hard armor alternative.
B. Mitigation and Monitoring	As documented in the BE, HA and HA Addendum (Exhibits H, I and T) and federal ESA Consultation documents (Exhibits J and S), the project has been inherently designed to avoid adverse impacts to floodplain functions that support ESA listed species. Work must be performed in accordance with applicable Federal, State and local regulations. In addition, the USACOE NWP 3 and NWP 13 Terms and Conditions include special conditions (Exhibit J-4).
D5. Stormwater and Erosion Control.	As summarized in the JARPA application and SEPA Checklist (Exhibits A and B), the project design incorporates measures to minimize and mitigate environmental impacts including Best Management Practices for erosion and sediment control. Per the SEPA MDNS:

