



CRGNSA CONSISTENCY DETERMINATION
MULTNOMAH CREEK BRIDGE REPAIR, CD-12-04-S
TRAILS CLUB OF OREGON
COLUMBIA RIVER GORGE NATIONAL SCENIC AREA
MULTNOMAH COUNTY, OR

BACKGROUND

The proposed bridge repair on Multnomah Creek by the Trails Club of Oregon is required to be consistent with the purposes of the Columbia River Gorge National Scenic Area Act as determined by the Forest Service pursuant to Section 14(d) of the Columbia River Gorge National Scenic Area Act. A complete consistency review application was received by my office in April 2012.

DECISION

I find that the above proposal is consistent with the Columbia River Gorge National Scenic Area (CRGNSA) Management Plan provided that it is implemented as described in the application materials, the CRGNSA Consistency Determination Findings of Fact, referenced as CD-12-04-S, and provided the following conditions are applied:

1. Materials used to fill the gabion baskets appear native to the surrounding natural stream substrate material.
2. Should any historic or prehistoric cultural resources be uncovered during project activities, the applicant shall cease work and immediately notify the CRGNSA office and the Oregon Office of Archeology and Historical Preservation. The applicant will also notify the Indian Tribal governments within 24 hours if the resources are prehistoric or otherwise associated with Native American Indians.
3. In order to reduce erosion and to establish stream bank stability, disturbed areas shall be seeded with native grasses as soon as possible after the work is completed. Additionally all soil-disturbed areas shall be planted with native shrubs using species found in the local area, such as sword fern, salmon berry, and dogwood.
4. Area of disturbance due to equipment operation/ construction shall be minimized as much as possible.
5. Equipment shall stay out of the water.
6. If appropriate, some water-related flora along the stream bank, such as salmon berry, shall be planted in disturbed areas.
7. Temporary erosion control devices, such as silt fences, shall be used to prevent soil movement into the stream.
8. No more than 15% of the project area shall be disturbed soil.

Additionally:

1. The project proponent shall secure all necessary permits with local, state and federal agencies.

ADMINISTRATIVE REVIEW OPPORTUNITIES

A written request for review of the Consistency Determination, with reasons to support the request, must be received within 20 days of the date shown with the Area Manager signature below. Requests for review should be addressed to: Request for Review, Regional Forester, P.O. Box 3623, Portland, OR 97208.

IMPLEMENTATION DATE

This project may begin immediately as long as it complies with the conditions as described in items (1-7) above. This decision expires two years after the date on this determination. If implementation has not commenced before that date, a new consistency review or extension shall be required.

CONTACT

The Columbia River Gorge National Scenic Area staff prepared an analysis file in conjunction with this project. For further information, contact Christine Plourde at the Columbia River Gorge National Scenic Area, phone: (541) 308-1713, e-mail: cplourde@fs.fed.us.

LYNN BURDITT

Area Manager

July 5, 2012

Date

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FINDINGS OF FACT

LANDOWNER:	U.S. Forest Service
PROPOSED ACTION:	Bridge Repair
LOCATION:	Township 1N, Range 6E, Section 17 Tax lot: 1N6E17-00500
NATIONAL SCENIC AREA DESIGNATION:	Special Management Area
LAND USE DESIGNATION:	Open Space
LANDSCAPE SETTING	Gorge Walls, Canyon lands and Wild lands

The following findings of fact contain the applicable standards and guidelines from the CRGNSA Management Plan. The Management Plan, as adopted in 2004 and updated in 2011, is in effect. The CRGNSA Management Plan standards and guidelines are displayed in regular type. The findings are displayed in **bold type**.

A. PUBLIC COMMENT

A notice describing the project was sent to a mailing list of known interested parties and adjacent landowners on April 12, 2012. A period of 30 days was allowed for public comment. Two comments were received.

One comment was received stating the project should be considered maintenance under the National Environmental Policy Act.

The proposal falls under a category of actions which are excluded from documentation in a NEPA decision document.

The Friends of the Columbia Gorge submitted comments regarding the application of appropriate resource protection guidelines and standards of applications.

The appropriate CRGNSA Management Plan guidelines are addressed in the following Findings of Fact. The application materials distributed for comment are considered to be adequate for review.

B. PROJECT PROPOSAL

The applicant proposes repair an existing road bridge on Multnomah Creek which was damaged during a winter storm. The project is on National Forest System land. The repair includes work on the substructure of the bridge. See the application signed on April 12, 2012 for a complete project description.

C. LAND USE DESIGNATIONS

The Management Plan, Part II, Chapter 3 Open Space, SMA guidelines, states:

2.A. Changes in existing uses, including reconstruction, replacement, and expansion of existing structures and transportation facilities, except for commercial forest practices.

Findings: The proposed road bridge repair is an allowable use upon review, as the bridge is an existing use.

D. SCENIC RESOURCES

The Management Plan, Part I, Chapter 1 (Scenic Resources), SMA guidelines, states:

SMA Design Guidelines Based on Landscape Settings

(Guidelines 1.A- 1.D are not applicable and not included)

1. The following guidelines apply to all lands within SMA landscape settings regardless of visibility from KVAs (includes areas seen from KVAs as well as areas not seen from KVAs):
 - E. Gorge Walls, Canyonlands, and Wildlands; New developments and land uses shall retain the overall visual character of the natural appearing landscape.
 1. Structures, including signs, shall have a rustic appearance, use non-reflective materials, have low contrast with the surrounding landscape, and be of a Cascadian architectural style.
 2. Temporary roads shall be promptly closed and revegetated.
 3. New utilities shall be below ground surface, where feasible.
 4. Use of plant species non-native to the Columbia River Gorge shall not be allowed.

Findings: The proposal is within the Gorge Walls, Canyonlands and Wildlands landscape setting. No temporary roads, utilities or non-native plant species are proposed. Cascadian architecture is defined in the Management Plan as:

Cascadian architecture (SMA): Architectural style using native rock work. Large timber, and steeply pitched roofs in a rustic manner.

The existing bridge is constructed of dimensional lumber with some large posts and would not be considered Cascadian architecture due to the level of refinement and form. The proposed gabion baskets are not considered to be of a Cascadian architectural style due to the industrial qualities of the material. The proposed gabion baskets would moderately contrast with desired Cascadian architectural style however would not change the overall architectural style of the existing bridge.

SMA Design Guidelines for Sites Topographically Visible from KVAs

(Guidelines 10, 11, 12, 13 and 14 are not applicable and not included)

1. The guidelines in this section shall apply to proposed developments on sites topographically visible from key viewing areas.

2. New developments and land uses shall be evaluated to ensure that the required scenic standard is met and that scenic resources are not adversely affected, including cumulative effects, based on the degree of visibility from key viewing areas.
3. The required SMA scenic standards for all development and uses are summarized in the following table:

Required SMA Scenic Standards		
LANDSCAPE SETTING	LAND USE DESIGNATION	SCENIC STANDARD
Gorge Walls, Canyonlands and Wildlands	Forest, Agriculture, Public Recreation, Open Space	Not Visually Evident

Findings: The required scenic standard is **Not Visually Evident**. The proposal is topographically visible from the following KVAs:

KVA	Foreground	Middleground	Background
SR-14			X

4. In all landscape settings, scenic standards shall be met by blending new development with the adjacent natural landscape elements rather than with existing development.
5. Proposed developments or land uses shall be sited to achieve the applicable scenic standard. Development shall be designed to fit the natural topography, to take advantage of landform and vegetation screening, and to minimize visible grading or other modifications of landforms, vegetation cover, and natural characteristics. When screening of development is needed to meet the scenic standard from key viewing areas, use of existing topography and vegetation shall be given priority over other means of achieving the scenic standard such as planting new vegetation or using artificial berms.
6. The extent and type of conditions applied to a proposed development or use to achieve the scenic standard shall be proportionate to its degree of visibility from key viewing areas.
 - A. Decisions shall include written findings addressing the factors influencing the degree of visibility, including but not limited to:
 - (1) The amount of area of the building site exposed to key viewing areas,
 - (2-5)
 - B. Conditions may be applied to various elements of proposed developments to ensure they meet the scenic standard for their setting as seen from key viewing areas, including but not limited to:
 - (1-4)

Findings: The project area is fully screened from view of KVAs by existing coniferous forest. The project would meet the scenic standard of **Not Visually Evident** as proposed.

7. Sites approved for new development to achieve scenic standards shall be consistent with guidelines to protect wetlands, riparian corridors, sensitive plant or wildlife sites and the buffer zones of each of these natural resources, and guidelines to protect cultural resources.

Findings: See Natural and Cultural Resource sections.

8. Proposed developments shall not protrude above the line of bluff, cliff or skyline as seen from key viewing areas.
9. Structure height shall remain below the average tree canopy height of the natural vegetation adjacent to the structure, except if it has been demonstrated that meeting this guideline is not feasible considering the function of the structure.

Findings: The proposed development would not protrude above the line of bluff, cliff, skyline or above average tree canopy height.

SMA Guidelines for Areas Not Seen from KVAs

The Management Plan, Part I, Chapter 1, SMA guidelines, states:

1. Unless expressly exempted by other provisions in this chapter, colors of structures on sites not visible from key viewing areas shall be earth-tones found at the specific site. The specific colors or list of acceptable colors shall be approved as a condition of approval, drawing from the recommended palette of colors included in the *Scenic Resource Implementation Handbook*.

Findings: The predominant color of the gabion baskets will be that of the rock. It should be made a condition of approval that the materials used to fill the gabion baskets appear native to the surrounding natural stream substrate material. By using native appearing material in the baskets the color will naturally match surrounding earth tone colors.

Cumulative Effects

Views of the bridge abutments are the affected resources.

Spatial Boundary

The view shed from SR-14 of the Gorge Walls Canyonlands and Wildlands in this portion of the CRGNSA is the spatial boundary.

Temporal Boundary

The gabions are anticipated to last approximately 25 years. The temporal boundary for consideration of cumulative effects to scenic resources is 25 years.

Past Actions

The cumulative effects analysis does not include an analysis of past actions. Current conditions within the Columbia River gorge have been impacted by innumerable actions over the last century (and beyond), and trying to isolate the individual actions that continue to have residual impacts would be nearly impossible. Providing the details of past actions on an individual basis would not be useful to predict the cumulative effects of the proposed action or alternatives. Focusing on individual actions would be less accurate than looking at existing conditions, because there is limited information on the environmental impacts of individual past actions, and one cannot reasonably identify each and every action over the last century that has contributed to current conditions. Additionally, focusing on the

impacts of past human actions risks ignoring the important residual effects of past natural events, which may contribute to cumulative effects just as much as human actions. The current conditions serve as an aggregate of all past actions, so by looking at current conditions, we are sure to capture all the residual effects of past human actions and natural events, regardless of which particular action or event contributed those effects.

Present Actions

Continued road and recreation operation and maintenance as well as fire suppression are ongoing activities that are presently occurring within the effects analysis boundary.

Reasonably Foreseeable Future Actions

Continued road and recreation maintenance, resource enhancement projects and fire suppression are activities that are anticipated to continue to occur over the next 25 years within the effects analysis boundary.

Cumulative Impacts

Past and present development activities have cumulatively modified certain elements of the analysis boundary, however on a whole and considering existing screening vegetation, the visual character of this Gorge Walls Canyonlands and Wildlands in this portion of the CRGNSA is in very good condition. Activities such as road and recreation operation and maintenance, resource enhancement projects and fire suppression are anticipated to continue to occur at current levels without much expansion. Addition of gabion baskets to an existing disturbed area within the project boundary is anticipated to have negligible effects to the view from SR-14. This proposal added to past, present and reasonably foreseeable future actions would not result in cumulative impacts to scenic resources.

Conclusion:

The color of the gabion baskets and industrial qualities of them will result in a negligibly minor effect to scenic resources considering the frequency, magnitude and duration of view.

E. CULTURAL RESOURCES

The Management Plan, Part I, Chapter 2 (Cultural Resources), SMA Policies states:

1. New developments or land uses shall not adversely affect significant cultural resources.
2. Federal agencies shall follow steps 1 through 5 under Guideline 4 below, for new developments or land uses on all federal lands, federally assisted projects, and forest practices.
7. The Forest Service shall be responsible for performing steps 1 through 5 under guideline 4 for forest practices and National Forest system lands.
8. The Forest Service shall consult with the Indian tribal governments and other consulting parties in performing steps 1 through 5 under guideline 4.

The Management Plan, Part I, Chapter 2 (Cultural Resources), SMA Guidelines states:

5. Determination of potential effects to significant cultural resources shall include consideration of cumulative effects of proposed developments that are subject to any of the following: 1) a reconnaissance or historic survey; 2) a determination of significance; 3) an assessment of effect; or 4) a mitigation plan. (Added: U.S. Sec. Ag. concurrence 7/1/11)

Findings:

A cultural resources review of the project was completed by a Forest Service archaeologist. It was determined that a cultural resource reconnaissance survey was not required. The bridge to be modified is not historic. The project was determined to have no effect to cultural resources.

Tribal notification was sent out to Confederated Tribes of the Warm Springs, Confederated Tribes of the Umatilla Indian Reservation, Nez Perce Tribe, Yakama Nation and the Confederated Tribes of the Grand Ronde.

A condition should be placed stating that should any historic or prehistoric cultural resources be uncovered during project activities, the applicant shall cease work and immediately notify the CRGNSA office and the Oregon Office of Archeology and Historical Preservation. The applicant should also notify the Indian Tribal governments within 24 hours if the resources are prehistoric or otherwise associated with Native American Indians. The applicant would also be provided with the policy for inadvertent discovery of cultural resources.

Cumulative Impacts

The proposal will have no effect to cultural resources; therefore, there will be no unresolved adverse cumulative effects on significant cultural resources within the Columbia River Gorge National Scenic Area

F. NATURAL RESOURCES

The Management Plan, Part II, Chapter 3 (Natural Resources), SMA guidelines, states:

Water Resources (Wetlands, Streams, Ponds, Lakes, And Riparian Areas)

SMA Guidelines

1. All new developments and uses, as described in a site plan prepared by the applicant, shall be evaluated using the following guidelines to ensure that natural resources are protected from adverse effects. Comments from state and federal agencies shall be carefully considered. (Site plans are described under “Review Uses” in Part II, Chapter 7: General Policies and Guidelines.)
2. Water Resources (Wetlands, Streams, Ponds, Lakes, and Riparian Areas)
 - A. All Water Resources shall, in part, be protected by establishing undisturbed buffer zones as specified in 2.A.(2)(a) and 2(b) below. These buffer zones are measured horizontally from a wetland, stream, lake, or pond boundary as defined below.
 - (1) All buffer zones shall be retained undisturbed and in their natural condition, except as permitted with a mitigation plan.

(2) Buffer zones shall be measured outward from the bank full flow boundary for streams, the high water mark for ponds and lakes, the normal pool elevation for the Columbia River, and the wetland delineation boundary for wetlands on a horizontal scale that is perpendicular to the wetlands, stream, pond or lake boundary. On the main stem of the Columbia River above Bonneville Dam, buffer zones shall be measured landward from the normal pool elevation of the Columbia River. The following buffer zone widths shall be required:

(a) A minimum 200 foot buffer on each wetland, pond, lake, and each bank of a perennial or fish bearing stream, some of which can be intermittent.

(b) A 50-foot buffer zone along each bank of intermittent (including ephemeral), non-fish bearing streams.

(c) Maintenance, repair, reconstruction and realignment of roads and railroads within their rights-of-way shall be exempted from the wetlands and riparian guidelines upon demonstration of all of the following:

(i) The wetland within the right-of-way is a drainage ditch not part of a larger wetland outside of the right-of-way.

(ii) The wetland is not critical habitat.

(iii) Proposed activities within the right-of-way would not adversely affect a wetland adjacent to the right-of-way.

(3) The buffer width shall be increased for the following:

(a) When the channel migration zone exceeds the recommended buffer width, the buffer width shall extend to the outer edge of the channel migration zone.

(b) When the frequently flooded area exceeds the recommended riparian buffer zone width, the buffer width shall be extended to the outer edge of the frequently flooded area.

(c) When an erosion or landslide hazard area exceeds the recommended width of the buffer, the buffer width shall be extended to include the hazard area.

(4) Buffer zones can be reconfigured if a project applicant demonstrates all of the following: (1) the integrity and function of the buffer zone is maintained, (2) the total buffer area on the development proposal is not decreased, (3) the width reduction shall not occur within another buffer, and (4) the buffer zone width is not reduced more than 50% at any particular location. Such features as intervening topography, vegetation, man made features, natural plant or wildlife habitat boundaries, and flood plain characteristics could be considered.

(5) Requests to reconfigure buffer zones shall be considered if an appropriate professional (botanist, plant ecologist, wildlife biologist, or hydrologist) hired by the project applicant (1) identifies the precise location of the sensitive wildlife/plant or water resource, (2) describes the biology of the sensitive wildlife/plant or hydrologic condition of the water resource, and (3) demonstrates that the proposed use will not have any negative effects, either direct or indirect, on the affected wildlife/plant and their surrounding habitat that is vital to their long-term survival or water resource and its long-term function.

(6) The local government shall submit all requests to re-configure sensitive wildlife/plant or water resource buffers to the Forest Service and the appropriate state agencies for review. All written comments shall be included in the project file. Based on the

comments from the state and federal agencies, the local government will make a final decision on whether the reconfigured buffer zones are justified. If the final decision contradicts the comments submitted by the federal and state agencies, the local government shall justify how it reached an opposing conclusion.

Findings: A site plan was included in project application which identifies Multnomah Creek. The project is entirely within the buffer zones of the perennial stream. There was no request to re-configure the buffers.

B. When a buffer zone is disturbed by a new use, it shall be replanted with only native plant species of the Columbia River Gorge.

Findings: Only native plants of the Columbia River Gorge would be planted.

C. The applicant shall be responsible for identifying all water resources and their appropriate buffers (see above).

D. Wetlands Boundaries shall be delineated using the following:

(1-4)

E. Stream, pond, and lake boundaries shall be delineated using the bank full flow boundary for streams and the high water mark for ponds and lakes. The project applicant shall be responsible for determining the exact location of the appropriate boundary for the water resource.

F. The local government may verify the accuracy of, and render adjustments to, a bank full flow, high water mark, normal pool elevation (for the Columbia River), or wetland boundary delineation. If the adjusted boundary is contested services, at the project applicant's expense, or the local government will ask for technical assistance from the Forest Service to render a final delineation.

G. Buffer zones shall be undisturbed unless the following criteria have been satisfied:

(1) The proposed use must have no practicable alternative as determined by the practicable alternative test.

Those portions of a proposed use that have a practicable alternative will not be located in wetlands, stream, pond, lake, and riparian areas and/or their buffer zone.

(2) Filling and draining of wetlands shall be prohibited with exceptions related to public safety or restoration/enhancement activities as permitted when all of the following criteria have been met:

(a) A documented public safety hazard exists or a restoration/ enhancement project exists that would benefit the public and is corrected or achieved only by impacting the wetland in question, and

(b) Impacts to the wetland must be the last possible documented alternative in fixing the public safety concern or completing the restoration/enhancement project, and

(c) The proposed project minimizes the impacts to the wetland.

(3) Unavoidable impacts to wetlands and aquatic and riparian areas and their buffer zones shall be offset by deliberate restoration and enhancement or creation (wetlands only) measures as required by the completion of a mitigation plan.

H. Determination of potential natural resources effects shall include consideration of cumulative effects of proposed developments within the following areas: wetlands, streams, ponds, lakes, riparian areas and their buffer zones. (*Added: U.S. Sec. Ag. concurrence 7/1/11*)

Practicable Alternative Test

1. An alternative site for a proposed use shall be considered practicable if it is available and the proposed use can be undertaken on that site after taking into consideration cost, technology, logistics, and overall project purposes.

A practicable alternative does not exist if a project applicant satisfactorily demonstrates all of the following:

A. The basic purpose of the use cannot be reasonably accomplished using one or more other sites in the vicinity that would avoid or result in less adverse effects on wetlands, ponds, lakes, riparian areas, wildlife or plant areas and/or sites.

B. The basic purpose of the use cannot be reasonably accomplished by reducing its proposed size, scope, configuration, or density, or by changing the design of the use in a way that would avoid or result in less adverse effects on wetlands, ponds, lakes, riparian areas, wildlife or plant areas and/or sites.

C. Reasonable attempts were made to remove or accommodate constraints that caused a project applicant to reject alternatives to the proposed use. Such constraints include inadequate infrastructure, parcel size, and land use designations. If a land use designation or recreation intensity class is a constraint, an applicant must request a Management Plan amendment to demonstrate that practicable alternatives do not exist.

Findings: The work related to this project falls within the buffer zone of Multnomah Creek, a perennial stream. The project is to modify an existing bridge over Multnomah Creek which can only be completed by working within the buffer zone. There is no practicable alternative to work within the buffer zone that would not involve disturbing the riparian zone.

Mitigation Plan

1. Mitigation Plans shall be prepared when:

A. The proposed development or use is within a buffer zone (wetlands, ponds, lakes, riparian areas, wildlife or plant areas and/or sites).

B. There is no practicable alternative (see the “practicable alternative” test). 2. In all cases, Mitigation Plans are the responsibility of the applicant and shall be prepared by an appropriate professional (botanist/ecologist for plant sites, a wildlife/fish biologist for wildlife/fish sites, and a qualified professional for water resource sites).

Findings: The proposed development is within a buffer zone of a perennial stream and a no practicable alternative test has been completed. A mitigation plan is required.

3. The primary purpose of this information is to provide a basis for the project applicant to redesign the proposed use in a manner that protects sensitive water resources and wildlife/plant areas and sites, that maximizes his/her development options, and that mitigates,

through restoration, enhancement, and replacement measures, impacts to the water resources and/or wildlife/plant area or site and/or buffer zones.

4. The applicant shall submit the mitigation plan to the local government. The local government shall submit a copy of the mitigation plan to the Forest Service, and appropriate state agencies. If the final decision contradicts the comments submitted by the state and federal wildlife agency/heritage program, the local government shall justify how it reached an opposing conclusion.
5. A project applicant shall demonstrate sufficient fiscal, technical, and administrative competence to successfully execute a mitigation plan involving wetland creation.
6. Mitigation plans shall include maps, photographs, and text. The text shall:
 - A. Describe the biology and/or function of the sensitive resources (e.g. wildlife/plant species or wetland) that will be affected by a proposed use. An ecological assessment of the sensitive resource to be altered or destroyed and the condition of the resource that will result after restoration will be required. Reference published protection and management guidelines.
 - B. Describe the physical characteristics of the subject parcel, past, present, and future uses, and the past, present, and future potential impacts to the sensitive resources. Include the size, scope, configuration, or density of new uses being proposed within the buffer zone.
 - C. Explain the techniques that will be used to protect the sensitive resources and their surrounding habitat that will not be altered or destroyed (for example, delineation of core habitat of the sensitive wildlife/plant species and key components that are essential to maintain the long-term use and integrity of the wildlife/plant area or site).
 - D. Show how restoration, enhancement, and replacement (creation) measures will be applied to ensure that the proposed use results in minimum feasible impacts to sensitive resources, their buffer zones, and associated habitats.
 - E. Show how the proposed restoration, enhancement, or replacement (creation) mitigation measures are NOT alternatives to avoidance. A proposed development/use must first avoid a sensitive resource, and only if this is not possible should restoration, enhancement, or creation be considered as mitigation. In reviewing mitigation plans, the local government, appropriate state agencies, and Forest Service shall critically examine all proposals to ensure that they are indeed last resort options.
7. At a minimum, a project applicant shall provide to the local government a progress report every 3 years that documents milestones, successes, problems, and contingency actions. Photographic monitoring stations shall be established and photographs shall be used to monitor all mitigation progress.
8. A final monitoring report shall be submitted to the local government for review upon completion of the restoration, enhancement, or replacement activity. This monitoring report shall document successes, problems encountered, resource recovery, status of any sensitive wildlife/plant species and shall demonstrate the success of restoration and/or enhancement actions. The local government shall submit copies of the monitoring report to the Forest Service; who shall offer technical assistance to the local government in helping to evaluate the completion of the mitigation plan. In instances where restoration and enhancement efforts have failed, the monitoring process shall be extended until the applicant satisfies the restoration and enhancement guidelines.

9. Mitigation measures to offset impacts to resources and/or buffers shall result in no net loss of water quality, natural drainage, fish/wildlife/plant habitat, and water resources by addressing the following: **(G. and H. are not applicable and not included)**
- A. Restoration and enhancement efforts shall be completed no later than one year after the sensitive resource or buffer zone has been altered or destroyed, or as soon thereafter as is practicable.
- B. All natural vegetation within the buffer zone shall be retained to the greatest extent practicable. Appropriate protection and maintenance techniques shall be applied, such as fencing, conservation buffers, livestock management, and noxious weed control. Within five years, at least 75 percent of the replacement vegetation must survive. All plantings must be with native plant species that replicate the original vegetation community.
- C. Habitat that will be affected by either temporary or permanent uses shall be rehabilitated to a natural condition. Habitat shall be replicated in composition, structure, and function, including tree, shrub and herbaceous species, snags, pool-riffle ratios, substrata, and structures, such as large woody debris and boulders.
- D. If this standard is not feasible or practical because of technical constraints, a sensitive resource of equal or greater benefit may be substituted, provided that no net loss of sensitive resource functions occurs and provided the local government, in consultation with the appropriate State and Federal agency, determine that such substitution is justified.
- E. Sensitive plants that will be destroyed shall be transplanted or replaced, to the maximum extent practicable. Replacement is used here to mean the establishment of a particular plant species in areas of suitable habitat not affected by new uses. Replacement may be accomplished by seeds, cuttings, or other appropriate methods. Replacement shall occur as close to the original plant site as practicable. The project applicant shall ensure that at least 75 percent of the replacement plants survive 3 years after the date they are planted
- F. Nonstructural controls and natural processes shall be used to the greatest extent practicable.

(1-9)

Findings: As a result of being within the buffer zone, mitigation must be performed to offset impacts to the buffer zone. The following mitigation plan has should be implemented:

- 1. In order to reduce erosion and to establish stream bank stability, disturbed areas should be seeded with native grasses as soon as possible after the work is completed. Additionally all soil-disturbed areas should be planted with native shrubs using species found in the local area, such as sword fern, salmon berry, and dogwood.**
- 2. Area of disturbance due to equipment operation/ construction should be minimized as much as possible.**
- 3. Equipment should stay out of the water.**
- 4. If appropriate, plant some water-related flora along the stream bank, such as salmon berry, in disturbed areas.**

Wildlife and Plants

(Guidelines 3.b- 3.I are not applicable and not included)

A. Protection of sensitive wildlife/plant areas and sites shall begin when proposed new developments or uses are within 1000 ft of a sensitive wildlife/plant site and/or area. Sensitive Wildlife Areas are those areas depicted in the wildlife inventory and listed in Table 2, including all Priority Habitats listed in this Chapter. The approximate locations of sensitive wildlife and/or plant areas and sites are shown in the wildlife and rare plant inventory.

Findings: The wildlife and rare plant inventory has been reviewed and no sensitive species/sites/ areas were identified within 1,000 of the project with the exception of riparian priority habitat. Riparian habitats are addressed in the water resources guidelines above.

Soil Productivity

A. Soil productivity shall be protected using the following guidelines:

- (1) A description or illustration showing the mitigation measures to control soil erosion and stream sedimentation.
- (2) New developments and land uses shall control all soil movement within the area shown on the site plan.
- (3) The soil area disturbed by new development or land uses, except for new cultivation, shall not exceed 15 percent of the project area.
- (4) Within 1 year of project completion, 80 percent of the project area with surface disturbance shall be established with effective native ground cover species or other soil-stabilizing methods to prevent soil erosion until the area has 80 percent vegetative cover.

Findings: Areas of disturbed soil will be re-vegetated as part of the mitigation plan. In order to meet the soil productivity guidelines the following conditions should be made:

- Temporary erosion control devices, such as silt fences, should be used to prevent soil movement into the stream.
- No more than 15% of the project area should be disturbed soil.

Cumulative Effects

The resource affected by this the riparian habitat of Multnomah Creek.

Spatial Boundary

The spatial boundary for riparian cumulative effects is the riparian area of Multnomah Creek and tributaries downstream of the project area.

Temporal Boundary

Because the road preexisted this action and the modification to the infrastructure is minimal the effects to the riparian habitat from this proposal are limited to the short term effects from construction. It is anticipated that any construction effects such as ground disturbance and sedimentation would occur within the first 2 years following construction as vegetation establishes. The temporal boundary for consideration of cumulative effects is 2 years.

Past Actions

The cumulative effects analysis does not include an analysis of past actions. Current conditions within the Columbia River gorge have been impacted by innumerable actions over the last century (and beyond), and trying to isolate the individual actions that continue to have residual impacts would be nearly impossible. Providing the details of past actions on an individual basis would not be useful to predict the cumulative effects of the proposed action or alternatives. Focusing on individual actions would be less accurate than looking at existing conditions, because there is limited information on the environmental impacts of individual past actions, and one cannot reasonably identify each and every action over the last century that has contributed to current conditions. Additionally, focusing on the impacts of past human actions risks ignoring the important residual effects of past natural events, which may contribute to cumulative effects just as much as human actions. The current conditions serve as an aggregate of all past actions, so by looking at current conditions, we are sure to capture all the residual effects of past human actions and natural events, regardless of which particular action or event contributed those effects.

Present Actions

Currently activities include road, railroad and trail maintenance, recreation, fire suppression and ongoing operation of Multnomah Falls lodge.

Reasonably Foreseeable Future Actions

Road, railroad and trail maintenance; recreation; fire suppression; ongoing operation of Multnomah Falls lodge; realignment of approximately ¼ mile of trail and two bridge repairs.

Cumulative Impacts

Past and present development activities have cumulatively changed the riparian habitat downstream of this project area. The stream channel above Multnomah Falls is relatively undisturbed whereas the lower portion has been altered by many development activities. Due to CRGNSA Management Plan restrictions for work within riparian areas and the restrictive nature of SMA Open Space, these activities will likely continue to occur at current levels without much expansion. Construction and associated effects may contribute incrementally to the level of human disturbance within the riparian habitat but considering past, present and reasonably foreseeable future actions it would not result in more than moderate adverse cumulative impacts.

G. RECREATION RESOURCES

(Guidelines 3, 5-9 are not applicable and not included)

The Management Plan, Part II, Chapter 4 (Recreation Resources), SMA guidelines, state:

1. New developments and land uses shall not displace existing recreational use.
2. Recreation resources shall be protected from adverse effects by evaluating new developments and land uses as proposed in the site plan. An analysis of both onsite and offsite cumulative effects shall be required.
4. Mitigation measures shall be provided to preclude adverse effects on the recreation resource.

Findings: The project area is within Recreation Intensity Class 1. There is no recreation development proposed and the project is not adjacent to established recreation facilities. The proposed bridge modification would not result in adverse effects to recreation resources.

Cumulative Effects

The proposal would have no adverse effects to recreation resources; therefore, there will be no unresolved adverse cumulative effects on recreation resources within the Columbia River Gorge National Scenic Area.

SMA Provisions: Recreation Intensity Classes

(Guidelines 1-4 are not applicable and not included)

H. CONCLUSION

The proposed road bridge modification at on Multnomah Creek is consistent with the National Scenic Area Management Plan Policy and Guidelines provided they meet the criteria and conditions listed in the Findings of Fact and Consistency Determination.