



Multnomah Falls GAOA Improvements

Multnomah County, Oregon

Decision Memo and Consistency Determination (CD-25-01-S)

Background

Located in the Columbia River Gorge, Multnomah Falls Lodge (“the Lodge”) is an iconic structure that is listed on the National Register of Historic Places. Its backdrop, Multnomah Falls, is one of the most popular natural sites in Oregon and the site is a significant feature in the Historic Columbia River Highway Historic Landmark District. The Lodge was built in 1925 by the City of Portland, with the Forest Service taking ownership in 1939. Multnomah Falls Company, Inc (MFCI) has operated the site through a special use permit since 1962. Visitation has increased steadily, especially in recent years, and it is necessary to ensure that the historic Lodge is both providing adequate services to the public, and that its historic character is maintained and protected as more users visit this iconic natural and cultural landmark.

Decision

I have decided to enhance visitor services at the historic lodge, including restrooms, the visitor center, exterior service areas, electrical systems upgrades, mechanical systems upgrades, security and access control systems upgrades, and other associated work. Maps and diagrams describing the proposed action were included with the scoping materials and are available upon request.

This action is categorically excluded from documentation in an environmental impact statement (EIS) or an environmental assessment (EA). The applicable category of actions is identified in agency procedures as *Construction, reconstruction, decommissioning, or disposal of buildings, infrastructure, or improvements at an existing recreation site* (36 CFR 220.6(e)(22)). This category of action(s) is applicable because the proposed action will add additional infrastructure and improvements to an existing recreation site.

I find that there are no extraordinary circumstances that would warrant further analysis and documentation in an EA or EIS. I took into account resource conditions identified in agency procedures that should be considered in determining whether extraordinary circumstances might exist:

- **Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species** – This project is not expected to affect protected animal or plant species or any critical habitat. Potential sediment delivery to Multnomah Creek is mitigated by



directional boring technology, designated staging areas, and erosion control measures based on Forest Service Best Management Practices. Therefore, no extraordinary circumstance exists for these resources.

- **Flood plains, wetlands, or municipal watersheds** – A small portion of a jurisdictional floodplain exists within the project area as per Executive Order 11988 – Floodplain Management. These are features identified by the Federal Emergency Management Agency’s (FEMA) Flood Insurance Rate Maps (FIRM). Additional jurisdictional floodplain areas have been identified downstream of the project area. Designated wetlands have also been identified directly downstream of the project area. Proposed project activities, in combination with the implementation of erosion control measures and Best Management Practices, would ensure there are no impacts to floodplains or wetlands. There are no municipal watersheds within or adjacent to the project area.
- **Congressionally designated areas such as wilderness, wilderness study areas, or national recreation areas** – The Columbia River Gorge National Scenic Area (CRGNSA) is a congressionally designated area, as are the Special Management Areas (SMAs) within the CRGNSA. The Consistency Determination prepared for this project concluded that the project was allowable under the Management Plan for the CRGNSA, and therefore there are no effects to the CRGNSA or SMAs. No other congressionally designated areas exist in the project area.
- **Inventoried roadless areas or potential wilderness areas** – There are no potential wilderness areas within the CRGNSA. The Larch Roadless Area is approximately a quarter mile south of the project area. Because this roadless area is outside of the project area, there are no effects to inventoried roadless areas or potential wilderness areas.
- **Research natural areas** – There are no research natural areas within the CRGNSA. Therefore, there are no effects to research natural areas.
- **American Indians and Alaska Native religious or cultural sites** – A cultural resource report was sent to the four Columbia River Treaty Tribes and Oregon SHPO on April 30, 2025, determining that the proposed action would have no adverse effect to historic properties. No comments or responses were received from the Tribes. Oregon SHPO concurred with the determination of no adverse effect to historic properties.
- **Archaeological sites, or historic properties or areas** – A cultural resource report was sent to the four Columbia River Treaty Tribes and Oregon SHPO on April 30, 2025, determining that the proposed action would have no adverse effect to historic properties. No comments or responses were received from the Tribes. Oregon SHPO concurred with the determination of no adverse effect to historic properties.

Public Involvement

This action was originally listed as a proposal on the Columbia River Gorge National Scenic Area Schedule of Proposed Actions and to the CRGNSA’s public website on January 21, 2025. A public notice was sent to adjacent landowners and known interested parties as required by the Management Plan for the CRGNSA.



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Findings Required by Other Laws and Regulations

This decision is consistent with the Management Plan for the Columbia River Gorge National Scenic Area and the Mt. Hood National Forest Land Management Plan. The project was designed in conformance with guidelines protecting the scenic, cultural, natural, and recreation resources of the Columbia River Gorge National Scenic Area. The Consistency Determination requires the following conditions of approval for the project:

1. All vegetation on site must be retained unless it creates a safety hazard.
2. A bentonite return plan is required prior to directional boring.
3. A cultural resource monitor shall be present during ground disturbances associated with the directional boring and the trash enclosure demolition and construction.
4. The inadvertent discovery procedures described in the Management Plan shall be followed in the event that cultural resources are discovered during construction.

On July 3, 2025, the US Department of Agriculture issued a NEPA Interim Final Rule that consolidated NEPA regulations for all USDA subcomponents and resulted in the rescission of the Forest Service NEPA regulations. This included the Forest Service's categorical exclusion regulations at 36 CFR 220.6. However, because this project was initiated prior to the promulgation of the Interim Final Rule, it may be reviewed under the previous regulation.

Administrative Review and Implementation

This project is not subject to administrative review under 36 CFR 218. A written request for review of the CRGNSA Consistency Determination, with reasons to support the request, must be received within 20 days of the date shown with the Forest Supervisor signature below. Requests for review should be addressed to: Request for CRGNSA Review, Regional Forester, P.O. Box 3623, Portland, OR 97208. An electronic copy of the request should be provided to the USFS-CRGNSA Office at 902 Wasco Street, Suite 200, Hood River, Oregon 97031, ATTN Appeals, and/or emailed to appeals-pacificnorthwest-columbia-river-gorge-nsa@usda.gov.

This decision may be implemented immediately. The Consistency Determination expires two years after the date on this determination. If implementation has not commenced before that date and an extension of the determination has not been requested, a new consistency review shall be required.

Contact

For additional information concerning this decision, contact: Aiden Forsi, NEPA Planner, Columbia River Gorge National Scenic Area, aiden.forsi@usda.gov, (541) 645-3648.

DONNA MICKLEY

Date

Forest Supervisor
Columbia River Gorge National Scenic Area



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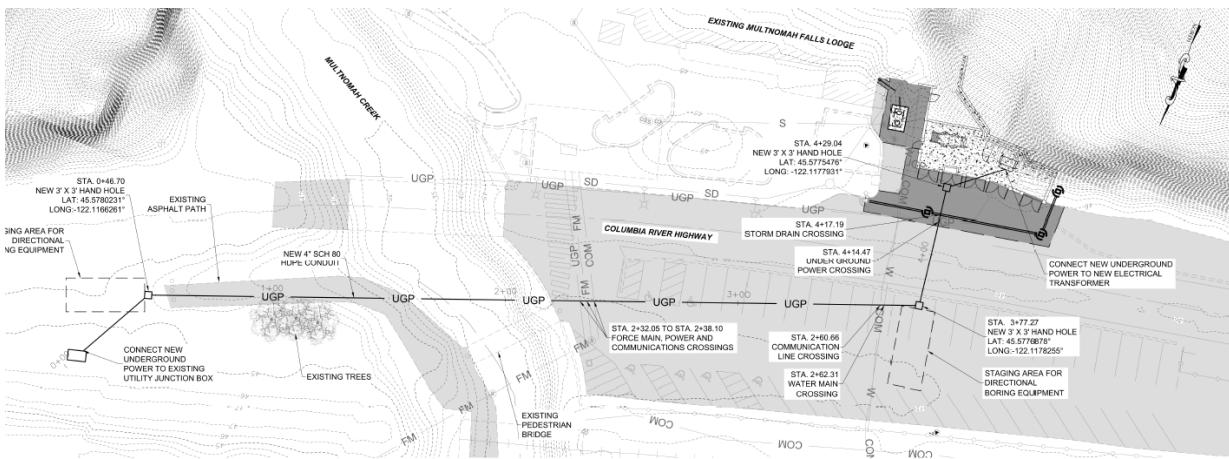
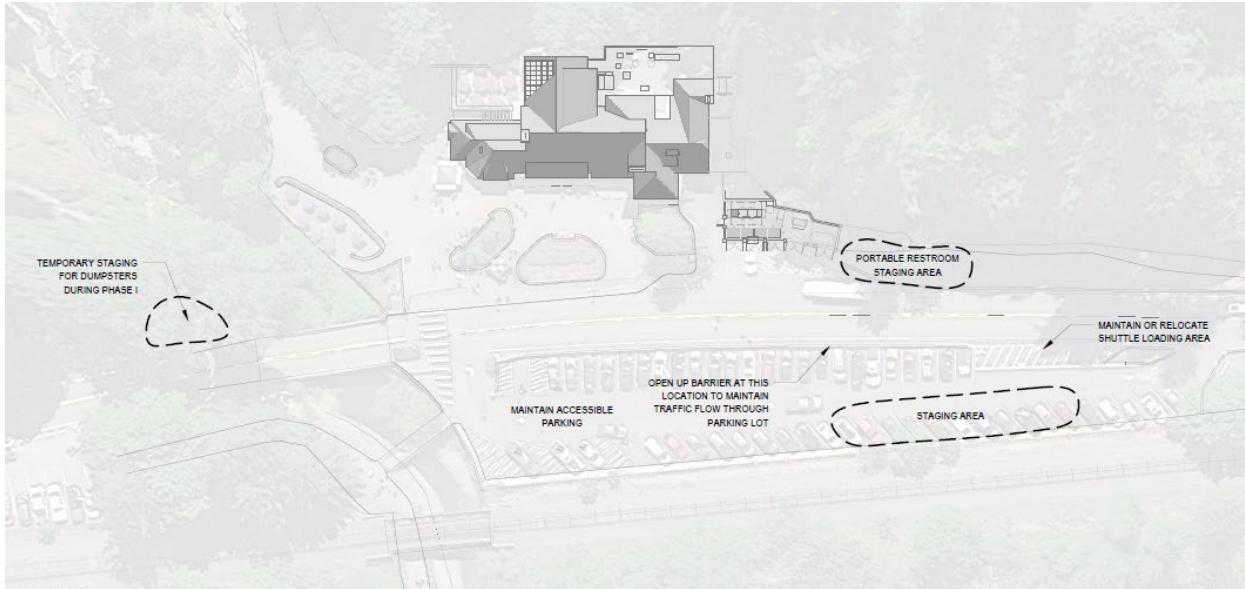
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FINDINGS OF FACT

LANDOWNER:	USDA Forest Service
APPLICANT:	USDA Forest Service
PROPOSED ACTION:	Improvements to the historic Multnomah Falls Lodge, including modifications to the exterior of the existing structure
LOCATION:	T01N R06E S07, W.M.
NATIONAL SCENIC AREA DESIGNATION:	Special Management Area
LAND USE DESIGNATION:	Public Recreation
LANDSCAPE SETTING:	Coniferous Woodlands

The following findings of fact contain the applicable standards and guidelines from the CRGNSA Management Plan. The Management Plan, as adopted in 2020, is in effect. The CRGNSA Management Plan standards and guidelines are displayed in regular type. The findings are displayed in **bold type**.

Project Site Plan



Public Comment

A notice describing the project was sent to a mailing list of known interested parties and adjacent landowners on January 22, 2025. A period of 30 days was allowed for public comment. The following comments were received:

*Comment: Steve McCoy with Friends of the Columbia Gorge commented that the proposed development must be sited on the parcel in a location that will achieve visual subordinance as seen from KVAs, using existing topography and vegetation for screening and applying any necessary design changes before requiring new screening measures. He also commented that various wildlife and plant species may be affected by the project, highlighting endangered and threatened salmonids in Multnomah Creek, Johnson's waterfall carabid beetle (*Pterostichus johnsoni*), and Howell's daisy (*Erigeron howellii*). The comment also included reference to all applicable scenic, cultural, natural, and recreation protection guidelines in the Management Plan.*



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Response: The findings of fact included in this Consistency Determination address the scenic resource guidelines, and address protections for wildlife and rare plants. Additionally, the Consistency Determination ensures consideration of all resource protection guidelines.

Comment: Anna Palmer, Senior Manager of Real Estate for Union Pacific, commented that they have an active lease near this location, and that a utility installation would require review, approval, and the appropriate agreements with UPRR.

Response: CRGNSA staff are reviewing Union Pacific's utility encroachment application. Because this comment does not address consistency with the Management Plan, it does not preclude CRGNSA from making a decision in this Consistency Determination.

Project Proposal

The intent of this project is to enhance visitor services at Multnomah Falls Lodge through multiple phased scopes of work including restrooms, the visitor center, exterior service areas, electrical systems upgrades, mechanical systems upgrades, security and access control systems upgrades, and other associated work.

The work includes multiple phased areas of construction within and adjacent to the historic Multnomah Falls Lodge including:

(1) Primary electrical service replacement to three phase from single phase, trash enclosure and storage enhancement, and standby back-up power generation provisions. This work will require, but may not be limited to, selective demolition, excavation, directional drilling, concrete foundations and retaining wall structures, stone faced wall and building structures, roof and drainage construction, electrical service and distributions, standby power generation and switching, propane services, and any associated work.

a. Utility Service Installation / 3-Phase Conversion

i. Contractor to provide directional boring and install the conduit for the power company from the utility service vault to the new pad mounted transformer location. The conduit routing will include providing one new underground vault and running through one existing utility vault. Two pull vaults will be excavated, one in the employee parking lot east of Multnomah Creek and one in the public parking lot west of Multnomah Creek.

b. Trash Enclosure:

i. The existing trash enclosure and utility building will be demolished. New trash enclosure will be constructed to expand the footprint to accommodate a generator, existing panels and transfer switch, a new three phase electrical transformer, the existing propane tank and trash receptacles.

(2) Public restroom on the ground floor will undergo selective demolition, reconfiguration, and reconstruction. This work will require, but may not be limited to, selective demolition of the existing ground floor restroom facilities and new construction of domestic water distribution and sanitary waste construction, electrical and security systems, wood and steel structural systems, mechanical ventilation systems, architectural finishes, toilet accessories, and associated work.

(3) Lodge wide mechanical, electrical, and security systems rehabilitation. This work will require, but may not be limited to, selective demolition of historic and non-historic finishes, existing mechanical systems replacements and upgrades, new mechanical systems installation, existing



and new electrical services, replacement of existing security and access control systems, new historically compatible architectural finishes, roof constructions, and associated work.

(4) Visitor center selective demolition, reconfiguration, and reconstruction. This phase of work will require, but may not be limited to, selective demolition of the existing ground floor visitor center facilities and new construction of stone covered concrete floor systems, wood framed architectural wall and ceiling systems, casework and exhibits constructions, mechanical ventilation systems, electrical and security systems, historic restoration of entrances and finishes, and associated work.

Land Use Designation

Finding: Any interior work at the Lodge is not subject to review under the Management Plan. This includes reconstruction of the public restroom and the visitor center. The Lodge-wide mechanical, electrical, and security systems rehabilitation includes interior work that is not subject to review under the Management Plan, and exterior work that is considered modification to an existing structure and is subject to review under the Management Plan.

- The project occurs within an area designated as SMA Public Recreation. SMA Public Recreation Review Use 1(K) allows “Utility facilities for public service upon a showing that:
 - (1) There is no alternative location with less adverse effect on Public Recreation land.
 - (2) The size is the minimum necessary to provide the service.”

Finding: The proposed 4-inch pipe for electrical conduit will be installed using horizontal directional boring. The directional boring will connect the Lodge to an existing utility junction box northeast of the Lodge. Two pull vaults will be installed, one adjacent to the junction box, and one within the parking lot north of the Lodge. Alternative locations for the utility installation to connect the junction box to the Lodge include aboveground wires or trenching under the Historic Columbia River Highway. Undergrounding the conduit using directional boring has fewer impacts to scenic resources, does not require the demolition and reconstruction of a historic and recreation resource, and has only temporary effects to recreation use during construction. There is no alternative location with less adverse effect on Public Recreation land.

The walls of the pipe are 1 inch thick, and the pipe houses two 1.5 inch thick conduit wires. The pull vaults are approximately 3 cubic feet in volume and provide the minimum access required to initiate the horizontal directional boring and to turn the boring direction 90 degrees to connect to the Lodge. The size of the utility facility is the minimum necessary to provide the service.

The proposed utility facility for public service is an allowable use in the SMA Public Recreation Land Use Designation, subject to review for compliance with scenic, cultural, natural, and recreational resources guidelines.



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- The addition on the south side of the Lodge is less than 200 feet in area and is no taller than the height of the existing building, and is reviewable under the Expedited Development Review Process Guideline 1(B). However, because of the other components of the project, the addition will be reviewed under the full Consistency Determination process.

Finding: The addition to the Lodge is an allowable use in the SMA Public Recreation Land Use Designation, subject to review for compliance with scenic, cultural, natural, and recreational resources guidelines. This includes installation of the security system, and installation of new historically compatible architectural finishes.

- The modifications to exterior of the Lodge are considered “Changes to Existing Uses and Structures” under Management Plan Part II, Chapter 7: General Policies and Guidelines – Existing Uses and Discontinued Uses Guideline 4, which states that “Except as otherwise provided, any change to an existing use or modification to the exterior of an existing structure shall be subject to review and approval pursuant to this Management Plan.”

Finding: The modifications to the Lodge are an allowable use in the SMA Public Recreation Land Use Designation, subject to review for compliance with scenic, cultural, natural, and recreational resources guidelines. This includes demolition and reconstruction of finishes, roof constructions, mechanical installations, and electrical installations.

- The demolition and reconstruction of the trash enclosure and utility building is considered “Replacement of Existing Structures Not Damaged or Destroyed by Disaster” under Management Plan Part II, Chapter 7: General Policies and Guidelines – Existing Uses and Discontinued Uses Guideline 2, subject to the following conditions:
 - A. The replacement structure shall have the same use as the original structure.
 - B. The replacement structure may have a different size or location than the original structure. An existing manufactured home may be replaced with a framed residence and an existing framed residence may be replaced with a manufactured home.
 - C. The replacement structure shall be subject to the scenic, cultural, recreation and natural resources guidelines; the treaty rights guidelines; and the land use designations guidelines involving agricultural buffer zones, approval criteria for fire protection, and approval criteria for siting of dwellings on forest land.
 - D. The original structure shall be considered discontinued if a complete land use application for a replacement structure is not submitted within the one-year time frame.

Finding: The replacement structure will maintain the existing use as an enclosure for trash receptacles and a utility building. The replacement structure will slightly increase the size of the existing enclosure and utility building, mainly through realignment to fit within the constrained space between the Lodge and the adjacent rock buttress. The replacement structure will be subject to the full Consistency Determination process. The original structure is not discontinued.

The demolition and reconstruction of the trash enclosure and utility building is an allowable use in the SMA Public Recreation Land Use Designation, subject to review for compliance with scenic, cultural, natural, and recreational resources guidelines.



Scenery

Finding: SMA Scenic Resource Policy 7 states:

“Rehabilitation or modification of historic structures on or eligible for the National Register of Historic Places may be exempt from [SMA Scenic Resource Policies 1-6] if such modification is in compliance with the National Register of Historic Places guidelines.”

The proposed development is modification of the Multnomah Falls Lodge, which is listed on the National Register of Historic Places and is a contributing element of the Historic Columbia River Highway National Historic Landmark. As such, the development is exempt from Scenic Resource Policies 1-6, listed below:

- Protect the appearance and character of the landscape setting
- Provide conditions of approval that provide effective, long-term scenic resource protection
- Use the scenic standards established by the Forest Service Scenery Management System
- Consider the size, scale, shape, color, texture, siting, height, building materials, lighting, or other visual aspects of the proposed development
- Protect scenic values within foregrounds of key viewing areas

While the proposed development will be exempt from these policies, the Consistency Determination will still review the scenic resource protection guidelines to ensure that the scenic resource is protected to the maximum extent practicable. Further, the proposed development is visually unobtrusive or proposes to modify existing structures; as such, potential impacts to scenic resources will be less than or equal to the existing visual impacts of the Lodge and associated development.

SMA Design Guidelines Based on Landscape Settings

Finding: The site is within the Coniferous Woodland Landscape Setting.

1. The following guidelines apply to all lands within SMA landscape settings regardless of visibility from KVAs (includes areas visible from KVAs as well as areas not visible from KVAs):

B. Coniferous Woodland and Oak-Pine Woodland: Woodland areas shall retain the overall appearance of a woodland landscape. New development and land uses shall retain the overall visual character of the natural appearance of the Coniferous Woodland and Oak-Pine Woodland landscape.

(1) Buildings designed to have a vertical overall appearance in the Coniferous Woodland landscape setting and a horizontal overall appearance in the Oak-Pine Woodland landscape setting shall be encouraged.

(2) Use of plant species native to the landscape setting. Examples of native species are identified in the Scenic Implementation Handbook as appropriate to the area shall be encouraged. Where non-native plants are used, they shall have native-appearing characteristics.



Finding: The proposed addition to Multnomah Falls Lodge does not increase the height or width of the building. The proposed changes to the garbage enclosure area do not increase the width of the building. No plantings are required for scenic resource protection. This guideline is met.

SMA Guidelines for Development and Uses Visible from KVAs

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

Finding: The landscape is topographically visible from the following Key Viewing Areas:

KVA	FOREGROUND	MIDDLEGROUND	BACKGROUND
Multnomah Falls	X (0.0 miles)		
Historic Columbia River Highway	X (0.0 – 0.15 miles)		
Interstate 84	X (0.06 – 0.5 miles)	X (0.5 – 0.75 miles)	
Columbia River	X (0.15 – 0.5 miles)	X (0.5 – 3.3 miles)	
State Route 14		X (1.4 – 4 miles)	X (4 – 4.5 miles)
Cape Horn		X (3 – 3.5 miles)	

2. New development 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.

Finding: The degree of visibility from KVAs is low for KVAs north of the Historic Columbia River Highway due to the scale of the proposed development, but it is very high for the HCRH and Multnomah Falls KVAs.

The HCRH KVA at this site is visually dominated by the developed site of the Lodge, and the Multnomah Falls KVA contains the Multnomah Falls Lodge. Consistency with the cultural resource guidelines ensures that the trash enclosure and addition to the Lodge continue to be considered as one associated set of development, rather than two visually distinct developments. While the proposed development is exempt from consistency with this guideline, it will not cause additional impacts to scenic resources as visible from Key Viewing Areas.

The proposed development is highly specific to the Lodge, and impacts to scenic resources are tied directly to consistency with cultural resource considerations at this site, as allowed through SMA Scenic Resource Policy 7. Consistency with SMA Scenic Resource Policy 7 ensures that there are no cumulative effects to scenic resources because the proposed development is specific to the Lodge, is shown to be consistent with cultural resource guidelines, and is exempt from consistency with scenic resource guidelines.



3. The required SMA scenic standards for all development and uses are summarized in the following table:

LANDSCAPE SETTING	LAND USE DESIGNATION	SCENIC STANDARD
Coniferous Woodland, Oak-Pine Woodland	Forest (National Forest Lands), Open Space	Not Visually Evident
River Bottomlands	Open Space	Not Visually Evident
Gorge Walls, Canyonlands, Wildlands	Forest, Agriculture, Public Recreation, Open Space	Not Visually Evident
Coniferous Woodland, Oak-Pine Woodland	Forest, Agriculture, Residential, Public Recreation	Visually Subordinate
Residential	Residential	Visually Subordinate
Pastoral	Forest, Agriculture, Public Recreation, Open Space	Visually Subordinate
River Bottomlands	Forest, Agriculture, Public Recreation	Visually Subordinate

Finding: Multnomah Falls Lodge is located within an SMA Public Recreation Land Use Designation. The Lodge is within the Coniferous Woodland Landscape Setting, and the applicable scenic standard is *Visually Subordinate*.

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.

Finding: As described above, consistency with cultural resource guidelines requires the use of particular form, line, color, texture, and design to maintain the historic character of the Lodge and the Highway. These design elements include wood painted light brown or tan, stone elements with natural wear and appearance, metal hardware painted black, and roof shingles matching the existing shingles on the Lodge. The shape and location of the addition to the south side of the Lodge ensures it is not visually distinct from the Lodge. The trash enclosure will be modified to be slightly shorter, and to emulate historic features of the Lodge and enhance the Lodge as a cultural resource. While the proposed development is exempt from consistency with this guideline, it will not cause additional impacts to scenic resources as visible from Key Viewing Areas.

5. Proposed development 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.

Finding: The proposed development is utility facilities for public service, an addition and modifications to an existing building, and the reconstruction of an existing trash enclosure and utility building. The Lodge was built within the shallow canyon carved by the outflow



of Multnomah Falls, and is constrained by the surrounding topography. The Lodge is a fully developed site, and changes to the arrangement of development would affect the historic qualities of the site or would require significant grading and modification of landforms to develop new areas. Existing vegetation along the alignment of the HCRH and adjacent railroad provides screening from Interstate 84 and other KVAs to the north. Because siting the proposed development elsewhere on the property is not feasible, and because existing vegetation screens the site from many of the areas from which it is visible, the proposed development has therefore been sited consistently with this standard.

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) The degree of existing vegetation providing screening,
- (3) The distance from the building site to the key viewing areas from which it is visible,
- (4) The number of key viewing areas from which it is visible, and
- (5) The linear distance along the key viewing areas from which the building site is visible (for linear key viewing areas, such as roads).

B. Conditions may be applied to various elements of proposed developments to ensure they meet the scenic standard for their setting as visible from key viewing areas, including but not limited to:

- (1) Siting (location of development on the subject property, building orientation, and other elements),
- (2) Retention of existing vegetation,
- (3) Design (form, line, color, texture, reflectivity, size, shape, height, architectural and design details and other elements), and
- (4) New landscaping.

Finding: The front façade of the Lodge is exposed to the Multnomah Falls KVA, the HCRH and Interstate 84 KVAs, and the Columbia River and State Route 14 KVAs. Because the Lodge is located within the shallow canyon carved by the Falls and by Multnomah Creek, visibility from these KVAs is limited as the public travels east and west of the Lodge. Visibility is limited from the Cape Horn KVA due to its distance from the Lodge and the viewing angle. There is no vegetation screening the front façade from the Multnomah Falls or HCRH KVAs. There is vegetation screening the Lodge from Interstate 84 and other KVAs to the north, though gaps in vegetation along Multnomah Creek and the adjacent pedestrian walkway allow the Lodge to be seen from those KVAs. The table in Scenic



Finding 1 shows the number of KVAs from which the Lodge is visible and the distances (including linear distances for linear KVAs) from the KVAs to the Lodge.

The proposed addition is located on the south side of the Lodge, and is only visible from the Multnomah Falls KVA. There is significant topographic and vegetative screening between the south side of the Lodge and the areas of the Multnomah Falls KVA from which the Lodge is visible, such that the Lodge is only partially visible from the bench on the paved path just north of the lower Multnomah Falls viewpoint (approximately 100 feet away) and from Benson Bridge (approximately 400 feet away).

Siting is discussed in the findings for Scenic Guideline 5, which determined that the proposed development is appropriately sited. No vegetation removal is proposed; a condition of approval shall require that vegetation on site is retained unless it creates a safety hazard. No new landscaping is proposed; landscaping cannot feasibly screen the trash enclosure from KVAs, and the proposed addition on the south side of the Lodge is adequately screened by existing vegetation.

As described above, the design of the addition and trash enclosure must be consistent with the cultural resource guidelines of the Management Plan; the form, line, color, texture, reflectivity, size, shape, height, architectural and design details, and other elements must contribute to the Lodge's inclusion on the National Register of Historic Places and as a contributing element to the Historic Columbia River Highway Historic Landmark. The Lodge contributes to the National Scenic Area landscape on account of its historic character, and incongruity between the character of the historic Lodge and the character of the proposed addition, modifications, and reconstructed enclosure would be more visually apparent, as visible from Key Viewing Areas. While the proposed development is exempt from consistency with this guideline, it will not cause additional impacts to scenic resources as visible from Key Viewing Areas.

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.

Finding: The proposed development is consistent with the natural and cultural resource guidelines. See the Natural Resources and Cultural Resources sections of the Consistency Determination below. This guideline is met.

8. Proposed development shall not protrude above the line of a bluff, cliff, or skyline as visible from key viewing areas.

Finding: As seen from the north, the proposed development is well below the skyline created by Multnomah Falls. As seen from the south, the proposed development is primarily lower in elevation than potential viewing areas and does not break the skyline. This includes the addition to the south side of the Lodge; because the addition is set back from the southern wall of the building and because it does not increase the height of the



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building, it will not be possible to view the addition in such a way that it breaks the skyline as visible from Key Viewing Areas. This guideline is met.

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.

Finding: Proposed development does not exceed the height of the existing building. This guideline is met.

10. The following guidelines shall apply to new landscaping used to screen development from key viewing areas:

A. New landscaping (including new earth berms) to achieve the required scenic standard from key viewing areas shall be required only when application of all other available guidelines in this chapter is not sufficient to make the development meet the scenic standard from key viewing areas. Development shall be sited to avoid the need for new landscaping wherever possible.

B. If new landscaping is necessary to meet the required standard, existing on-site vegetative screening and other visibility factors shall be analyzed to determine the extent of new landscaping, and the size of new trees needed to achieve the standard. Any vegetation planted pursuant to this guideline shall be sized to provide sufficient screening to meet the scenic standard within five years or less from the commencement of construction.

C. Landscaping shall be installed as soon as practicable, and prior to project completion. Applicants and successors in interest for the subject parcel are responsible for the proper maintenance and survival of planted vegetation, and replacement of such vegetation that does not survive.

D. The Scenic Resources Implementation Handbook shall include recommended species for each landscape setting consistent with the Landscape Settings Design Guidelines in this chapter, and minimum recommended sizes of new trees planted (based on average growth rates expected for recommended species).

Finding: No new landscaping is proposed. This guideline does not apply.

11. Unless expressly exempted by other provisions in this chapter, colors of structures on sites visible from key viewing areas shall be dark earth-tones found at the specific site or the surrounding landscape. The specific colors or list of acceptable colors shall be included as a condition of approval. The Scenic Resources Implementation Handbook shall include a recommended palette of colors as dark, or darker than the colors in the shadows of the natural features surrounding each landscape setting.

Finding: As described above, Multnomah Falls Lodge is listed on the National Register of Historic Places, and is a contributing element of the Historic Columbia River Highway National Historic Landmark. Consistency with cultural resource guidelines requires the use of colors matching the existing structure, including natural stone elements, light brown or tan paint on wood elements, and black for metal hardware. While the proposed development is exempt from consistency with this guideline, it will not cause additional impacts to scenic resources as visible from Key Viewing Areas.



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12. The exterior of structures on lands seen from key viewing areas shall be composed of non-reflective materials or materials with low reflectivity. Continuous surfaces of glass shall be limited to ensure meeting the scenic standard. The Scenic Resources Implementation Handbook includes a list of recommended exterior materials and screening methods.

Finding: As described above, Multnomah Falls Lodge is listed on the National Register of Historic Places, and is a contributing element of the Historic Columbia River Highway National Historic Landmark. Consistency with cultural resource guidelines requires the use of the materials proposed in the application. The proposed materials are not reflective (stone, shingle, wood) or are low reflectivity (painted metal hardware). No continuous surfaces of glass are proposed. While the proposed development is exempt from consistency with this guideline, it will not cause additional impacts to scenic resources as visible from Key Viewing Areas.

13. Any exterior lighting shall be sited, limited in intensity, and shielded or hooded in a manner that prevents lights from being highly visible from key viewing areas and from noticeably contrasting with the surrounding landscape setting, except for road lighting necessary for safety purposes.

Finding: No new exterior lighting is proposed. This guideline does not apply.

14. Seasonal lighting displays may be permitted on a temporary basis, not to exceed 3 months.

Finding: No seasonal lighting displays are proposed. This guideline does not apply.

15. New buildings shall be compatible with the general scale of existing nearby development. Expansion of existing development shall comply with this guideline to the maximum extent practicable. New buildings that are 1,500 square feet or less are exempt from this guideline. Findings addressing this guideline shall include but are not limited to:

- A. Application of the landscape setting design guidelines, if applicable.
- B. A defined study area surrounding the development that includes at least ten existing buildings, not including existing buildings within urban areas or outside the National Scenic Area.
- C. Individual evaluations of scale for each separate proposed building in the application and each separate building in the study area, including:
 - (1) All finished above ground square footage;
 - (2) Total area of covered decks and porches;
 - (3) Attached garages
 - (4) Daylight basements
 - (5) Breezeways, if the breezeway shares a wall with an adjacent building
 - (6) Dimensions, based on information from the application or on Assessor's records D. An overall evaluation demonstrating the proposed development's compatibility with surrounding development. Buildings in the vicinity of the proposed development that are



significantly larger in size than the rest of the buildings in the study area should be removed from this evaluation.

Finding: No new buildings are proposed. This guideline does not apply.

SMA Guidelines for KVA Foregrounds and Scenic Routes

Finding: The proposed development is within the foregrounds of the Multnomah Falls Lodge KVA and the Historic Columbia River Highway KVA.

1. All new development and land uses immediately adjacent to scenic routes shall be in conformance with state or county scenic route guidelines.

Finding: The HCRH is not a designated state or county scenic route at this location. This guideline does not apply.

2. Scenic highway corridor strategies shall be implemented for Interstate 84 (I84), Washington State Route 14 (SR 14) and the Historic Columbia River Highway (HCRH). For I-84, SR 14 and the HCRH, this involves ongoing implementation (and possible updating) of the associated existing documents.

3. The goals of scenic corridor strategies shall include:

- 1) providing a framework for future highway improvements and management that meet Management Plan scenic guidelines and public transportation needs; and
- 2) creating design continuity for the highway corridor within the National Scenic Area. Corridor strategies shall, at minimum, include design guidelines (e.g. materials, conceptual designs, etc.) for typical projects that are consistent with Management Plan scenic resources provisions and an interdisciplinary, interagency project planning and development process.

Finding: Guidelines 2 and 3 are for preparation of corridor strategies. They do not apply to this project.

4. The following guidelines shall apply only to development within the immediate foregrounds of key viewing areas. Immediate foregrounds are defined as within the developed prism of a road or trail KVA or within the boundary of the developed area of KVAs such as Crown Pt. and Multnomah Falls. They shall apply in addition to applicable guidelines in the previous section (SMA Guidelines for Development Visible from KVAs).

A. The proposed development shall be designed and sited to meet the applicable scenic standard from the foreground of the subject KVA. If the development cannot meet the standard, findings must be made documenting why the project cannot meet the requirements in the previous section and why it cannot be redesigned or wholly or partly relocated to meet the scenic standard.

B. Findings must evaluate the following:

- (1) The limiting factors to meeting the required scenic standard and applicable guidelines from the previous section;
- (2) Reduction in project size;



- (3) Options for alternative sites for all or part of the project, considering parcel configuration and on-site topographic or vegetative screening;
- (4) Options for design changes including changing the design shape, configuration, color, height, or texture in order to meet the scenic standard.

C. Form, line, color, texture, and design of a proposed development shall be evaluated to ensure that the development blends with its setting as visible from the foreground of key viewing areas:

- (1) Form and Line - Design of the development shall minimize changes to the form of the natural landscape. Development shall borrow form and line from the landscape setting and blend with the form and line of the landscape setting. Design of the development shall avoid contrasting form and line that unnecessarily call attention to the development.
- (2) Color - Color shall be found in the project's surrounding landscape setting. Colors shall be chosen and repeated as needed to provide unity to the whole design.
- (3) Texture - Textures borrowed from the landscape setting shall be emphasized in the design of structures. Landscape textures are generally rough, irregular, and complex rather than smooth, regular, and uniform.
- (4) Design - Design solutions shall be compatible with the natural scenic quality of the Gorge. Building materials shall be natural or natural appearing. Building materials such as concrete, steel, aluminum, or plastic shall use form, line color and texture to harmonize with the natural environment. Design shall balance all design elements into a harmonious whole, using repetition of elements and blending of elements as necessary.

Finding: SMA Guidelines 5 and 6 for Development Visible from KVAs describe the proposed development as visible from the foregrounds of the Multnomah Falls KVA and the HCRH KVA, the constraints of the development site, and the significant historic features that require consideration under the cultural resource guidelines. The proposed development cannot be reduced in size and still achieve the goals of the project. There are no alternative sites available and no parcel reconfiguration is possible because the development must occur at the Lodge. Topographic and vegetative screening is not possible because the site is fully developed.

Multnomah Falls Lodge is listed on the National Register of Historic Places, and is a contributing element of the Historic Columbia River Highway National Historic Landmark. Consistency with cultural resource guidelines requires the use of particular form, line, color, texture, and design to maintain the historic character of the Lodge and the Highway. While the proposed development is exempt from consistency with this guideline, it will not cause additional impacts to scenic resources as visible from Key Viewing Areas.

5. Right-of-way vegetation shall be managed to minimize visual impacts of clearing and other vegetation removal as visible from key viewing areas. Roadside vegetation management (vista clearing, planting, etc.) should enhance views from the highway.



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Finding: No right-of-way vegetation management is considered in the proposed development. This guideline does not apply.

6. Screening from key viewing areas shall be encouraged for existing and required for new road maintenance, warehouse, and stockpile areas.

Finding: No new road maintenance, warehouse, or stockpile areas are proposed. This guideline does not apply.



Cultural

SMA Guidelines

1. All cultural resource surveys, evaluations, assessments, and mitigation plans shall be performed by professionals whose expertise reflects the type of cultural resources that are involved. Principal investigators shall meet the professional standards published in 36 CFR 61.
2. For federal or federally assisted undertakings, the reviewing agency shall complete its consultation responsibilities under Section 106 of the Historic Preservation Act of 1966 [36 CFR 800.2].
3. Discovery during construction: All authorizations for new developments or land uses shall require the immediate notification of the reviewing agency if cultural resources are discovered during construction or development. If cultural resources are discovered, particularly human bone or burials, work in the immediate area of discovery shall be suspended until a cultural resource professional can evaluate the potential significance of the discovery and recommend measures to protect and if possible recover the resource. If the discovered material is suspected to be human bone or a burial, the following procedures shall be used:
 - A. The applicant shall stop all work in the vicinity of the discovery.
 - B. The applicant shall immediately notify the Forest Service, the applicant's cultural resource professional, the county coroner, and appropriate law enforcement agencies.
 - C. The Forest Service shall notify the tribal governments if the discovery is determined to be an Indian burial or a cultural resource.

4. Reviewing agencies shall use the [...] steps under 36 CFR 800.4 for assessing potential effects to cultural resources and 36 CFR 800.5 for assessing adverse effects to cultural resources. [The Management Plan includes descriptions of these steps. The descriptions have been removed from this document.]
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.

Finding: A cultural resource report was prepared for the proposed modifications to the Lodge and surrounding area, and was submitted to Oregon SHPO and the Tribes on April 30, 2025. The 30-day review period ended on May 30, 2025. CRGNSA Heritage Resource staff determined that the proposed development would have no adverse effect to historic properties (36 CFR 800.5(b)). Oregon SHPO concurred with that determination on May 29, 2025. No comments or responses were received from the Tribes.

The report recommended cultural resource monitoring for the ground disturbances associated with the directional boring and the trash enclosure demolition and construction. That recommendation is included as a condition of approval.

A condition of approval shall require that the inadvertent discovery procedure described above is followed in the event that cultural resources are discovered during construction.



Natural Resources

SMA Guidelines: Water Resources / Wildlife and Plants

1. All new development 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. Cumulative effects analysis is not required for expedited review uses or development. 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 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 rare wildlife/plant or water resource, (2) describes the biology of the rare 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 rare 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.

Finding: Multnomah Creek is located within the project area. A 200-foot buffer applies to Multnomah Creek. The entirety of the project area is within the 200-foot buffer. The National Wetlands Inventory identifies a seasonally flooded wetland north of the project area between the railroad and Interstate 84. A 200-foot buffer applies to this wetland. The directional boring is the only component of the project within the wetland buffer.

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.

Finding: Disturbance within buffer zones is limited to previously developed areas, or underground. Because these areas cannot be replanted, this guideline does not apply.

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



Finding: The water resources and their buffers were identified.

D. Wetlands Boundaries shall be delineated using the following:

- (1) The approximate location and extent of wetlands in the National Scenic Area is shown on the National Wetlands Inventory (U.S. Department of the Interior). In addition, the list of hydric soils and the soil survey maps shall be used as an indicator of wetlands.
- (2) Some wetlands may not be shown on the wetlands inventory or soil survey maps. Wetlands that are discovered by the local planning staff during an inspection of a potential project site shall be delineated and protected.
- (3) The project applicant shall be responsible for determining the exact location of a wetlands boundary. Wetlands boundaries shall be delineated using the procedures specified in the 'Corps of Engineers Wetland Delineation Manual (on-line edition)' and applicable Regional Supplements.
- (4) All wetlands delineations shall be conducted by a professional who has been trained to use the federal delineation procedures.

Finding: The National Wetlands Inventory was used to determine the presence of wetlands and their buffers within the project area. Due to the presence of the railroad, CRGNSA staff determined that the delineated wetland boundary is concurrent with the National Wetlands Inventory.

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.

Finding: All project activities are within the Multnomah Creek or wetland buffer zones.

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 by the project applicant, the local government shall obtain professional 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.

Finding: This guideline does not apply.

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

H. The proposed use must have no practicable alternative as determined by the practicable alternative test.

- (1) Those portions of a proposed use that have a practicable alternative will not be located in wetlands, stream, pond, lake, and riparian areas 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 SMA mitigation plan.

Finding: See the Practicable Alternative Test section below. There is no practicable alternative for the proposed use. No filling or draining of wetlands is proposed. The project will only impact previously developed areas, and will traverse under Multnomah Creek and avoid impacts to the stream itself. Project implementation will include adherence to a bentonite return plan to avoid impacts from directional boring. Proposed development within the footprint of the Lodge is in a previously developed area and will have no effect on Multnomah Creek. As such, there are no unavoidable impacts to Multnomah Creek.

Because the identified wetland is north of the railroad tracks, project activities south of the railroad tracks will not have any effect on the wetland. Project implementation will include adherence to a bentonite return plan to avoid impacts from directional boring traveling downstream. The project proposal meets this guideline because riparian ecosystems and aquatic resources will be protected during implementation. No mitigation plan is required to offset impacts to water resources.

I. Proposed uses and development within wetlands, streams, ponds, lakes, riparian areas and their buffer zones shall be evaluated for cumulative effects to natural resources and cumulative effects that are adverse shall be prohibited.

Finding: Because the project is occurring within previously developed areas, traverses beneath the stream, and is physically disconnected from the wetland, there are no effects on water resources and therefore no adverse cumulative effects.

3. Wildlife and Plants

A. Protection of wildlife/plant areas and sites shall begin when proposed new development or uses are within 1000 feet of a rare wildlife or rare plant area or site. Rare wildlife areas are those areas depicted in wildlife data, including all sensitive wildlife sites and Priority Habitats listed in this Chapter. The approximate locations of rare wildlife and rare plant areas and sites are shown in wildlife and rare plant data.



Finding: There is no Northern spotted owl critical habitat within 1000 feet of the project area. Riparian habitat exists where directional boring will take place across Multnomah Creek, which is the main activity for wildlife concerns on this project. Sensitive avian species in the area include black swifts, olive-sided flycatchers, ospreys, and bald eagles. However, their core nesting habitats are well outside the project boundary.

State sensitive amphibian and invertebrate species may potentially be found in the riparian zone of the project area, such as Cope's giant salamander, Cascade torrent salamander, Johnson's waterfall carabid beetle, Columbia Gorge caddisfly, and A. caddisfly (*Farula constricta*).

The CRGNSA botanist surveyed the project area and determined that no plant species of concern within the project area. No further review for protection of rare plants is required.

Because there are no effects to water resources, there are no effects to salmonids within Multnomah Creek. No further review for protection of fish is required.

B. The local government shall submit site plans (of uses that are proposed within 1,000 feet of a rare wildlife or rare plant area or site) for review to the Forest Service and the appropriate state agencies (Oregon Department of Fish and Wildlife or the Washington Department of Wildlife for wildlife issues and by the Oregon Biodiversity Information Center or Washington Natural Heritage Program for plant issues).

Finding: The project is small in scope and operation. Most of the site where operations are taking place is previously disturbed, with infrastructure (paved lots, lodge, asphalt areas, bridges) present. Prior surveys conducted in the designated project area also did not observe any of the aforementioned sensitive species, but were recorded well outside the site and upstream of the waterfall. Records were pulled from the USFS and Oregon state databases (NRM and ORBIC) to confirm no sightings. This guideline is met.

C. The Forest Service wildlife biologists and botanists, in consultation with the appropriate state biologists, shall review the site plan and their field survey records. They shall:

- (1) Identify/verify the precise location of the wildlife or plant area or site,
- (2) Determine if a field survey will be required,
- (3) Determine, based on the biology and habitat requirements of the affected wildlife/plant species, if the proposed use would compromise the integrity and function of or result in adverse effects (including cumulative effects) to the wildlife and plant area or site. This would include considering the time of year when wildlife and plant species are sensitive to disturbance, such as nesting and rearing seasons, or flowering season, and,
- (4) Delineate the undisturbed 200-ft buffer on the site plan for rare plants or the appropriate buffer for rare wildlife areas or sites, including nesting, roosting, and perching sites.



(a) Buffer zones can be reconfigured if a project applicant demonstrates all of the following: (1) the integrity and function of the buffer zones 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.

(b) Requests to reduce 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 rare wildlife/plant or water resource, describes the biology of the rare 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 to the water resource and its long-term function.

(c) The local government shall submit all requests to re-configure rare 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 record of application and based on the comments from the state and federal agencies, the local government will make a final decision on whether the reduced buffer zone is 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.

Finding: The USFS wildlife biologist was informed and involved in the directional boring plans, including the bentonite concern for seepage into the riparian zone. A return plan from the contractor for bentonite leaks will be given to USFS to ensure resource protection. The wildlife biologist conducted a survey in March 2025 for the project area and found no sensitive species where operations would take place in the riparian zone. The small width scale (4"), short depth (3') and short linear length (~100') for the directional boring below Multnomah Creek would have minimal impact on wildlife resources and no cumulative effects are expected. No nesting activity, aestivation sites, or presence of sensitive species were observed by the biologist. Guideline is met.

D. The local government, in consultation with the state and federal wildlife biologists and botanists, shall use the following criteria in reviewing and evaluating the site plan to ensure that the proposed development or uses do not compromise the integrity and function of or result in adverse effects to the wildlife and plant area or site:

(1) Published guidelines regarding the protection and management of the affected wildlife/plant species. Examples include: the Oregon Department of Forestry management guidelines for osprey and great blue heron; Washington Department of Wildlife guidelines for a variety of species, including the western pond turtle, the peregrine falcon, and the Larch Mountain salamander.



- (2) Physical characteristics of the subject parcel and vicinity, including topography and vegetation.
- (3) Historic, current, and proposed uses in the vicinity of the rare wildlife/plant area or site.
- (4) Existing condition of the wildlife/plant area or site and the surrounding habitat of the area or site.
- (5) In areas of winter range, habitat components, such as forage and thermal cover, important to the viability of the wildlife must be maintained or, if impacts are to occur, enhancement must mitigate the impacts so as to maintain overall values and function of winter range.
- (6) The site plan is consistent with published guidance documents such as "Oregon Guidelines for Timing of In-Water Work to Protect Fish and Wildlife Resources" (Oregon Department of Fish and Wildlife 2008 or most recent version) and Washington's Aquatic Habitat Guidelines (2002 or most recent version).
- (7) The site plan activities coincide with periods when fish and wildlife are least sensitive to disturbance. These would include, among others, nesting and brooding periods (from nest building to fledgling of young) and those periods specified.
- (8) The site plan illustrates that new development and uses, including bridges, culverts, and utility corridors, shall not interfere with fish and wildlife passage.
- (9) Maintain, protect, and enhance the integrity and function of Priority Habitats as listed on the following Priority Habitats Table 1. This includes maintaining structural, species, and age diversity, maintaining connectivity within and between plant communities, and ensuring that cumulative impacts are considered in documenting integrity and function.

Finding: The project is within a previously disturbed area that is heavily used by the public and impacted by high noise levels due to its location, which is adjacent to the railroad, I-84 highway, Historic Columbia River Highway, and Multnomah Falls lodge and parking area. Nests for sensitive species are found outside the project area boundary; however, any residential/migratory songbirds that may nest would likely be habituated to existing high-decibel noise levels in the area and not disturbed by the activity.

Much of the riparian invertebrate species and amphibians would not be impacted from the directional boring implementation due to the small scale, simplicity, and short timeframe of the work. Terrestrial mollusks and invertebrates are rare for the small scope of area, and amphibian use is unlikely for the project specs given. No effect to wildlife populations is expected to occur from the proposed activity. Guideline is met.

E. The wildlife/plant protection process may terminate if the local government, in consultation with the Forest Service and state wildlife agency or heritage program, determines (1) the rare wildlife area or site is not active, or (2) the proposed use is not within the buffer zones and would



not compromise the integrity of the wildlife/plant area or site, or (3) the proposed use is within the buffer and could be easily moved out of the buffer by simply modifying the project proposal (site plan modifications). If the project applicant accepts these recommendations, the local government shall incorporate them into its development review order and the wildlife/plant protection process may conclude.

Finding: Guideline is met because there are no sensitive species of concern in the immediate proposal area.

F. If the above measures fail to eliminate the adverse effects, the proposed project shall be prohibited, unless the project applicant can meet the Practicable Alternative Test and prepare a mitigation plan to offset the adverse effects by deliberate restoration and enhancement.

Finding: The guideline is met because there are no sensitive species of concern for the proposed area. A return plan will be provided by the contractor for any unintentional bentonite release that cannot be contained and may have adverse effects to riparian species.

G. The local government shall submit a copy of all field surveys (if completed) and mitigation plans to the Forest Service and appropriate state agencies. The local government shall include all comments in the record of application and address any written comments submitted by the state and federal wildlife agency/heritage programs in its development review order.

Finding: Guideline is met, a survey was conducted by USFS wildlife biologist, and review from other wildlife agencies is not needed due to the lack of sensitive species present.

H. Based on the comments from the state and federal wildlife agency/heritage program, the local government shall make a final decision on whether the proposed use would be consistent with the wildlife/plant policies and guidelines. 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.

Finding: Guideline is met as a survey was conducted and found no sensitive species present in the proposed activity boundary.

I. The local government shall require the project applicant to revise the mitigation plan as necessary to ensure that the proposed use would not adversely affect a rare wildlife/plant area or site.

Finding: Guideline is met and no mitigation plan for habitat protection is currently needed. Contractor will provide a return plan for the bentonite use and any adverse effects that may incur.

4. 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.

Finding: The project proposal meets this guideline because soil resources will be protected during implementation. Delineated staging areas and erosion control measures will ensure that the productivity and health of soil resources is maintained. Surface disturbance is limited to previously developed areas and will not require establishment of native ground cover.

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.

Finding: Because the purpose of the project is to enhance the historic resource of the Lodge itself, there is no alternative site for the proposed additions and modifications to the Lodge. The directional boring concept was developed after consideration of the natural, scenic, and historic resources on site, and was determined to be the least impactful to resources overall. Alternatives to directional boring include aboveground wiring, which was ruled out due to expected adverse impacts to scenic and historic resources, and trenching the Historic Columbia River Highway, which was ruled out due to expected adverse impacts to historic resources. Several utilities are placed underneath the pedestrian bridge across Multnomah Creek, but there is no space available for the proposed electrical conduit. Directional boring under Multnomah Creek ensures that, on balance, all resources are protected; adherence to a bentonite return plan further ensures that there will be no effects to natural resources.

2. 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, or wildlife or plant areas 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, or wildlife or plant areas 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.

Finding: As described above, because the proposed use is associated with the existing Lodge, there are no other sites in the vicinity that can accomplish the proposed use. The design of the additions and modifications of the Lodge are necessary to ensure consistency with cultural resource protections. The new electrical service cannot be reasonably accomplished by other means without causing adverse effects to cultural and scenic resources. Because the constraints to the project are other Management Plan guidelines, the constraints cannot be reasonably removed or altered to allow other alternatives. Therefore, no practicable alternative exists.

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, or wildlife or plant areas or sites).
- B. There is no practicable alternative (see the “practicable alternative” test).

Finding: The proposed development is within water resource buffer zones, and does not have a practicable alternative. However, because project activities occur on previously developed ground or beneath the water resource, there are no effects on these resources from the proposed development. As such, no mitigation measures apply. No further review in this section is necessary.

Recreation

SMA Guidelines

1. New development and land uses shall not displace existing recreational use.

Finding: The proposed development will have temporary effects to recreation use at Multnomah Falls Lodge, including closure of parking areas, closure of restrooms, and closure of lodge amenities during construction. These activities will enhance the recreation experience at the Lodge, and will not displace the existing recreation use, except during construction. This guideline is met.

2. Recreation resources shall be protected from adverse effects by evaluating new development and land uses as proposed in the site plan. An analysis of both onsite and offsite cumulative effects shall be required.



Finding: The proposed development will enhance the recreation resource at Multnomah Falls Lodge, and will have no adverse effects onsite or offsite. Because there are no adverse effects, there are no cumulative effects. This guideline is met.

3. New pedestrian or equestrian trails shall not have motorized uses, except for emergency services.

Finding: No new trails are proposed. This guideline does not apply.

4. Mitigation measures shall be provided to preclude adverse effects on the recreation resource.

Finding: Because there are no adverse effects, no mitigation measures are necessary. This guideline does not apply.

5. The Facility Design Guidelines are intended to apply to individual recreation facilities. Development or improvements within the same Recreation Intensity Class are considered as separate facilities if they are separated by at least 1/4 mile of undeveloped land (excluding trails, pathways, or access roads).

Finding: The Facility Design Guidelines apply to recreation developments. The proposed development includes the addition of utility services and redevelopment of an existing building. Because the proposed development is not being reviewed as a recreation development, the Facility Design Guidelines do not apply.

6. New development and reconstruction of scenic routes shall include provisions for bicycle lanes.

Finding: No scenic routes are part of the proposed development. This guideline does not apply.

7. A local government may grant a variance of up to 10 percent to the guidelines of Recreation Intensity Class 4 for parking and campground units upon demonstration that all of the following conditions exist:

A. Demand and use levels for the proposed activity(s), particularly in the area where the site is proposed, are high and expected to remain so or increase. Statewide Comprehensive Outdoor Recreation Plan (SCORP) data and data from the National Visitor Use Monitoring Program shall be relied upon to meet the criterion in the absence of current applicable studies.

B. The proposed use is dependent on resources present at the site.

C. Reasonable alternative sites offering similar opportunities, including those in urban areas, have been evaluated, and it has been demonstrated that the proposed use cannot be adequately accommodated elsewhere.

D. The proposed use is consistent with the goals, objectives, and policies in this chapter.

E. Through site design and mitigation measures, the proposed use can be implemented without adversely affecting scenic, natural, or cultural resources and adjacent land uses.

F. Through site design and mitigation measures, the proposed use can be implemented without affecting or modifying treaty rights.

Finding: No new parking areas or campground units are proposed. This guideline does not apply.



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8. Proposals to change the Recreation Intensity Class of an area shall require a Management Plan amendment pursuant to policies 1 through 4 in "Amendment of the Management Plan" (Part IV, Chapter 1: Gorge Commission Role).

Finding: The proposed development does not consider a change to the Recreation Intensity Class. This guideline does not apply.

9. The Recreation Intensity Classes are designed to protect recreation resources by limiting land development and land uses.

Finding: The Recreation Intensity Class guidelines apply to recreation developments. The proposed development includes the addition of utility services and redevelopment of an existing building. Because the proposed development is not being reviewed as a recreation development, the Recreation Intensity Class guidelines do not apply.

Conclusion

The proposed development is consistent with the National Scenic Area Management Plan Policy and Guidelines provided it meets the criteria and conditions listed in the Findings of Fact and Consistency Determination.



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