

NOTICE OF NSA OPPORTUNITY TO COMMENT



www.multco.us/landuse ▪ Email: land.use.planning@multco.us ▪ Phone: (503) 988-3043

Application for a National Scenic Area Site Review

CASE FILE: T2-2025-0055

APPLICANT: Oregon Department of
Transportation

LOCATION: ODOT right-of-way north of westbound lanes of
I-84

Map, Tax lot: Adjacent to 2N7E -00200

BASE ZONE: Gorge Special Open Space (GSO)

OVERLAYS: None

KEY VIEWING AREAS: State Route – 14, Pacific Crest, Interstate – 84, Historic Columbia River
Highway, Columbia River, Beacon Rock

LANDSCAPE SETTING: Coniferous Woodlands

PROPOSAL: Request for an access road and five geotechnical exploration boreholes for a future
westbound Moffett Creek Bridge replacement.

- ❖ **COMMENT PERIOD:** Neighbors are invited to submit written comments for the proposal described above. Comments should be directed toward the approval criteria listed below. Any neighbor that submits comments will receive the County’s complete decision. Written comments will be accepted at LUP-comments@multco.us if received by **4:00 pm on Thursday, April 2, 2026**. Comments regarding Cultural Resources will be accepted until **4:00 pm on Thursday, April 9, 2026**.

If you do not wish to submit comments, no response is necessary.

Further information regarding this application is available by contacting LUP-comments@multco.us. Paper copies of these materials may be purchased for \$0.71/per page.

- ❖ **APPLICABLE APPROVAL CRITERIA** [Multnomah County Code (MCC)]:

General Provisions: MCC 38.0560 Code Compliance and Applications, MCC 38.0015 Definitions – Parcel, MCC 38.0110 Tribal Treaty Rights and Consultation

Gorge Special Open Space (GSO) Zone: MCC 38.2625 Review Uses, (D)(1) Changes in existing uses including reconstruction, replacement and expansion of existing structures and transportation facilities

NSA Site Review Criteria: MCC 38.7015 Application for NSA Site Review, MCC 38.7040 SMA Scenic Review Criteria, MCC 38.7050 SMA Cultural Resource Review Criteria, MCC 38.7075 SMA Natural Resource Review Criteria, MCC 38.7085 SMA Recreation Resource Review Criteria

Copies of the referenced Multnomah County Code sections can be obtained by visiting our website at <https://multco.us/landuse/zoning-codes/> under the link **Chapter 38 – Columbia River Gorge National Scenic Area** or by contacting our office at (503) 988-3043.

Vicinity Map

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- ❖ **DECISION MAKING PROCESS:** The Planning Director will render a decision on this application after the comment period expires. Notice of the Director's decision will be mailed to the applicant, those who submitted written comment during the comment period, those who requested the decision in writing, and the Gorge Commission. The Planning Director's decision can be appealed. An explanation of the requirements for filing an appeal will be included in the notice of decision.

- ❖ **IMPORTANT NOTE:** Failure to raise an issue before the close of the public record in sufficient detail to afford the County and all parties an opportunity to respond may preclude appeal on that issue to the Columbia River Gorge Commission.

- ❖ **ENCLOSURES:**
 - Narrative
 - Site Plans
 - Biological and Water Resources Memo

Notice to Mortgagee, Lien Holder, Vendor, or Seller:

ORS chapter 215 requires that if you receive this notice, it must promptly be forwarded to the purchaser.

I-84 Westbound Moffett Creek Bridge Replacement

Geologic Exploration NSA Permit

Oregon Department of Transportation Highway ROW south and north of 2N7E-00200 and south of 2N7E-00300

Zoning: GSO

Project Description

Background

The Interstate 84 westbound bridge over Moffett Creek is located east of the communities of Dodson/Warrendale and is owned and operated by Oregon Department of Transportation (ODOT). The westbound I-84 bridge needs to be replaced because the deck and substructure are in poor condition, and the structure is not consistent with current seismic and other roadway/bridge standards. ODOT is starting the process to design a replacement structure but requires subsurface information to be able to understand the requirements and limitations of any future structure in this location.

Project Description

The purpose of this project is to drill 5 exploration holes 60-100 feet deep in areas north of I-84 that will be potentially impacted by a future bridge replacement project. The explorations are necessary to evaluate slope stability and subsurface conditions as they relate to the design of the replacement bridge project. This NSA permit only covers geotechnical exploration (bore holes), and the associated access route for machinery to access the bore holes. ODOT will submit an additional permit to construct the westbound replacement bridge over Moffett Creek.

Temporary Construction Impacts

Crews will need to create an access route from the north side of the westbound bridge to the west to allow drilling equipment to access the areas needed for exploration. Once the drilling is complete, ODOT will fill the bore holes and restore any disturbed vegetation and mitigate impacts to scenic, natural, cultural, and recreational resources.

Permanent Impacts

There are no permanent impacts associated with geotechnical exploration and subsurface bore holes.

Applicant Findings for Multnomah County Code Sections §38.7040– Scenic Resource, §38.7050 – Cultural Resources, §38.7075 – Natural Resources, and § 38.7085 – Recreation Resources

§ 38.0045 REVIEW AND CONDITIONAL USE APPLICATIONS - SUBMITTAL REQUIREMENTS

(A) The following additional information shall be submitted for all review and conditional uses:

- (1) A list of Key Viewing Areas.

Applicant Response: The KVAs that are applicable are:

- Historic Columbia River Highway State Trail
- I-84
- Beacon Rock
- Columbia River

This narrative includes an analysis of the visual impacts (or lack thereof) of the proposed project.

(2) A map of the project area.

Applicant Response: Appendix A includes a Location Map that satisfies the requirements (a)-(o).

(3) Elevation drawings.

Applicant Response: Appendix B includes elevation drawings of the access road and bore hole sites. The natural grade and the finished grade will be the same. No structures are proposed.

(4) The following applications for structural development shall include a grading plan:

Applicant response: N/A this application does not include structural development.

§ 38.1000- GENERAL MANAGEMENT AREA AND SPECIAL MANAGEMENT AREA

Applicant Response: The project is within a Special Management Area (SMA). The zoning is GSO (Open Space) as shown on Figure 1 CRGNSA zoning map.

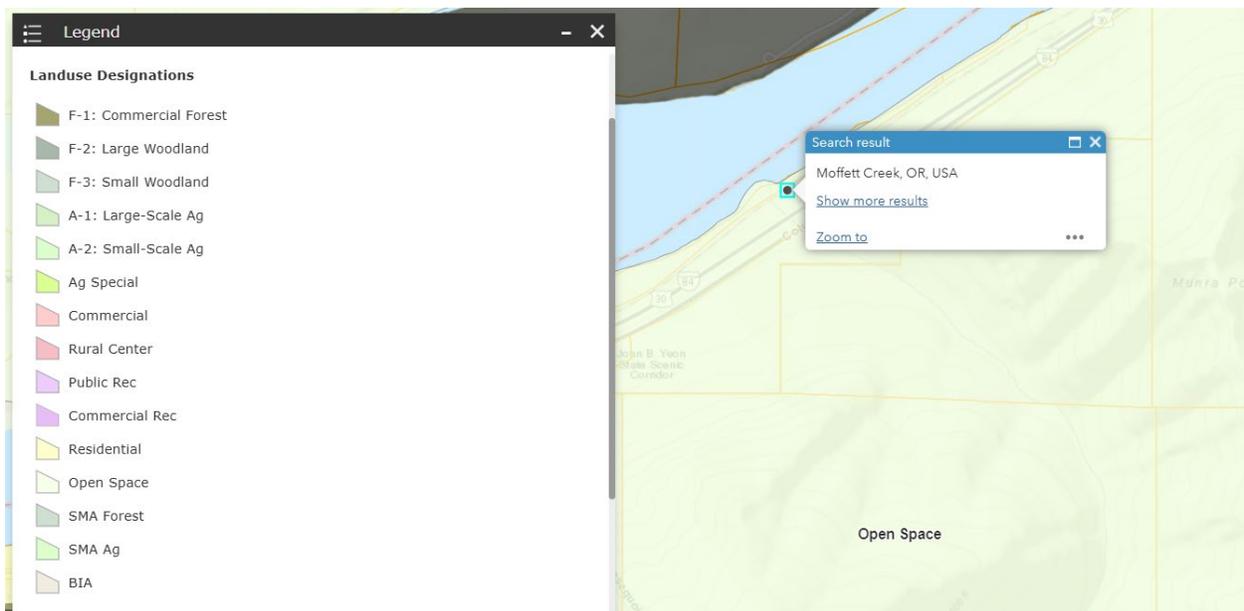


Figure 1 Zoning at Moffett Creek

§ 38.2625 REVIEW USES

(D) The following uses may be allowed on lands designated GSO.

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

Applicant Response: The proposed boreholes will help inform a future reconstruction of the I-84 westbound Moffett Creek Bridge.

(4) Utility facilities for public service upon a showing that:

(a) There is no alternative location with less adverse effect on land designated GSO;

(b) The size is the minimum necessary to provide the service.

Applicant Response: The bridge provides a public service (transportation connection), and due to the segments of I-84 on either side of the structure, there is no alternative location for a replacement bridge. The proposed boreholes are the minimum necessary to inform future bridge design. The access to the borehole locations is also the minimum necessary to allow equipment and crews in to do the work.

§ 38.7040 SMA SCENIC REVIEW CRITERIA

(A) All Review Uses and Conditional Uses visible from KVAs.

Applicant Response: ODOT evaluated the proposed use from the following list of KVAs:

- Beacon Rock
- Columbia River
- Historic Columbia River Highway State Trail
- I-84
- State Route 14

(1) New developments and land uses shall be evaluated to ensure that the 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.

Applicant Response: The proposed geotechnical exploration project area falls within the River Bottomlands setting in SMA Open Space zoning. The applicable Scenic Standard is Not Visually Evident. The subsurface geotechnical boreholes and access route are temporary in nature and will not have any long-term visual impacts. Due to the subterranean nature of the holes themselves, they will not be visible, and the project will meet the visual standard of Not Visually Evident.

(2) The required SMA scenic standards

River Bottomlands, Open Space –NOT VISUALLY EVIDENT

Applicant Response: The project is in the SMA GSO River Bottomlands Landscape Setting.

The zoning district is Open Space. The SMA standard to meet is NOT VISUALLY EVIDENT.

(3) In all landscape settings, scenic standards shall be met by blending new development with the adjacent natural landscape elements rather than with existing development.

Applicant Response: The applicable Scenic Standard is Not Visually Evident. The subsurface geotechnical boreholes and access are temporary in nature and will not have any long-term visual impacts. Due to the subterranean nature of the holes themselves, they will not be visible, and the project will meet the visual standard of Not Visually Evident.

(4) Proposed developments or land use shall be sited to achieve the applicable scenic standards.

Applicant Response: ODOT will conduct the subsurface explorations for approximately 2 weeks in duration and access to the borehole locations will be from existing right of way or from temporary access routes. Explorations will only be visible from KVAs when the explorations are taking place due to the machinery involved. Boreholes will be completed using truck-, track-, or skid-mounted drill rigs. However, once ODOT removes the machinery, the drilling locations will not be visible from key viewing areas as they are below ground and will be filled when drilling is complete. ODOT will remove and remediate the temporary access routes after the work is done.

(5) 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.

Applicant Response: Development is not proposed for this project. Once the subsurface explorations have been completed, ODOT will remove all machinery from the area, and the boreholes will not be visible from any of the KVAs, as all the work will be done beneath the surface. After the work is done, ODOT will remove and remediate the temporary access routes.

(a) Decisions shall include written findings addressing the Primary 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,

Applicant Response: Not applicable; no structures or buildings are proposed.

2. The degree of existing vegetation providing screening,

Applicant Findings: Not applicable; the amount of vegetation varies from minimal to forest screening, but no permanent structures are proposed.

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

Applicant Findings: The table below lists distances from the temporary access route and boreholes to the KVAs are listed in the table below.

Linear distance to geotechnical investigation sites	
<i>Beacon Rock</i>	<i>2-2.1 miles</i>
<i>Columbia River</i>	<i>180-250 feet</i>

<i>Historic Columbia River Highway State Trail</i>	<i>90-500 feet</i>
<i>I-84</i>	<i>50-60 feet</i>
<i>State Route 14</i>	<i>1.2-1.5 miles</i>

5. The linear distance along the key viewing areas from which the building site is visible (for linear key viewing areas, such as roads).

Applicant Findings: From the first to the last proposed drill hole, there is around 630 feet of linear distance. However, due to topography, and vegetation, the bore hole and temporary access route is only visible from I-84, one segment of the Historic Highway State Trail, and the Columbia River.

(6) 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.

Applicant Response: ODOT acknowledges this requirement.

(7) Proposed developments shall not protrude...

Applicant Response: Does not apply; the geotechnical exploration is sub-surface only and does not protrude above a bluff, cliff or skyline.

(8) Structure height shall remain below the average tree canopy height...

Applicant Response: Does not apply; the geotechnical exploration is sub-surface only and remains below the average tree canopy height.

(9) The following guidelines shall apply to new landscaping used to screen development from key viewing areas.

Applicant Response: ODOT will add Gorge-specific seeding to mitigate temporary impacts related to the access route, though no landscaping screening is anticipated as all permanent impacts are sub-surface.

(10) Colors of structures on sites visible from key viewing areas shall be dark earth-tones found at the specific site or the surrounding landscape.

Applicant Response: Not applicable – ODOT does not propose any structures.

(11) The exterior of structures on lands seen from key viewing areas shall be composed of non-reflective materials or materials with low reflectivity.

Applicant Response: Not applicable – ODOT does not propose any structures.

(12) Any exterior lighting...

Applicant Response: N/A, no lighting is proposed.

(13) Seasonal lighting...

Applicant Response: N/A

(14) New building 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 provision.

Applicant Response: Not applicable – ODOT does not propose any buildings.

(B) The following shall apply to all lands within SMA landscape settings regardless of visibility from KVAs:

Applicant Response: The proposed use is in an SMA; the landscape setting is River Bottomlands.

(3) River Bottomlands: River bottomland shall retain the overall visual character of a floodplain and associated islands.

(a) Buildings shall have an overall horizontal appearance in areas with little tree cover.

(b) Use of plant species native to the landscape setting.

Applicant Response: ODOT will re-seed any vegetation impacts resulting from the temporary access route with plant species native to the landscape setting. No buildings are proposed as part of this action.

Bromus carinatus (California brome) 5 Pure Live Seed (PLS)

Bromus vulgaris (Columbia brome) 3 PLS

Deschampsia caespitosa (Tufted hairgrass) 1 PLS

Elymus glaucus (Blue wildrye) 2.5 PLS

Festuca roemerii (Roemer's fescue) 2.5 PLS

Festuca rubra ssp. rubra (Red fescue) 5 PLS

(C) SMA Requirements for KVA Foregrounds and Scenic Routes

(1) All new developments and land uses immediately adjacent to Interstate 84, shall be in conformance with state or county scenic route standards.

Applicant Response: Not Applicable. No new development is proposed.

(2) The following guidelines shall apply only to development within the immediate foregrounds of key viewing areas.

Applicant Response: Not applicable – the proposed boreholes are outside of the immediate foregrounds of key viewing areas.

(D) SMA Requirements for areas not seen from KVAs

Applicant Response: Not applicable, no structures are proposed.

§ 38.7050 SMA CULTURAL RESOURCE REVIEW CRITERIA

(A) The cultural resource review criteria shall be deemed satisfied...

Applicant Response: ODOT acknowledges this requirement.

(B) If comment is received during the comment period provided in MCC 38.0530 (B)...

Applicant Response: ODOT acknowledges this requirement.

(C) The procedures of MCC 38.7045 shall be utilized for all proposed developments or land uses other than those federally assisted projects and forest practices.

Applicant Response: N/A. This project is federally funded.

(D) All cultural resource information shall remain confidential.

Applicant Response: ODOT acknowledges this requirement.

(E) Principal investigators shall meet the professional standards published in 36 CFR part 61.

Applicant Response: All cultural resource surveys, evaluations, assessments, and mitigation plans have been or will be performed by professional archaeologists and historians who meet the Secretary of the Interior's professional qualification standards in 36 CFR 61.

(F) The U.S. Forest Service will provide for doing (1) through (5) of subsection (G) below for forest practices and National Forest system lands.

Applicant Response: N/A The project is not a forest practice on National Forest System lands.

(G) If the U.S. Forest Service or Planning Director determines that a cultural resource survey is required for a new development.

Applicant Response: ODOT acknowledges these requirements. Appendix C includes documentation of cultural resource processes as part of this project.

(H) Discovery During Construction

Applicant Response: ODOT acknowledges this requirement and will follow the processes found in this section in the event of inadvertent discovery.

§ 38.7075 SMA NATURAL RESOURCE REVIEW CRITERIA

(A) All Water Resources shall, in part, be protected by establishing undisturbed buffer zones as specified in MCC 38.7075 (2)(a) and (2)(b).

Applicant Response: The proposed boreholes an access road is within cliff and stream buffer zones.

(1) All buffer zones shall be retained undisturbed and in their natural condition, except as permitted with a mitigation plan.

Applicant Response: The project will reseed and mitigate the disturbed areas within the buffer zone.

(2) Buffer zones shall be measured outward from the bank full flow boundary for streams. 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.

Applicant Response: Appendix A Site Plan shows the project area and the appropriate buffer zones. Appendix D provides details on natural resources and their buffers adjacent to the project.

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

Applicant Response: N/A – no intermittent streams are within the project area.

(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:

Applicant Response: N/A – no wetlands are within the project area.

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

Applicant Response: N/A, the buffer width will not be increased; none of the listed conditions (a) through (c) are present in the project area.

(4) Buffer zones can be reconfigured if a project applicant demonstrates all of the following:

Applicant Response: N/A, ODOT is not requesting a buffer reconfiguration.

(5) Requests to reconfigure buffer zones shall be considered...

Applicant Response: N/A, ODOT does not anticipate reconfiguring buffers as part of this project.

(6) The Planning Director shall submit all requests to reconfigure sensitive wildlife/plant or water resource buffers...

Applicant Response: N/A, ODOT does not anticipate reconfiguring buffers as part of this project.

(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.

Applicant Response: ODOT will re-seed and replant all disturbed areas within the buffer.

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

Applicant Response: Appendix A includes mapping of all resources, including water resources and the associated buffers. Appendix D includes a technical description/identification of all water resources and buffers within the project area.

(D) Wetlands Boundaries shall be delineated using the following:

Applicant Response: N/A – there are no wetlands within the project area.

(E) Stream, pond, and lake boundaries shall be delineated using the bank full flow boundary for streams...

Applicant Response: N/A there are no streams, ponds, or lakes within the project area.

(F) Multnomah County may verify the accuracy of, and render adjustments to, a bank full flow, high water mark...

Applicant Response: ODOT acknowledges this requirement.

(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.

Applicant Response: Buffers disturbances have been minimized to the maximum extent possible for this project. The impacts are temporary and associated with the access routes to boring locations not accessible from existing roads or trails.

A table with the total acreage of impacts across all buffers is below. These impacts are located within existing disturbed areas dominated by noxious weeds.

Project impact areas of Water Resources and their buffers.		
Resource	Direct impact (Ac)	Buffer Impact (Ac)
Wetland	0	0.018

- (2) Filling and draining of wetlands shall be prohibited...

Applicant Response: The project will not fill or drain wetlands.

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

Applicant Response: ODOT will restore and enhance the areas within the riparian buffer zone with Gorge-appropriate seeding.

(H) Protection of sensitive wildlife/plant areas and sites shall begin when proposed new developments or uses are within 1000 feet of a sensitive wildlife/plant site and/or area.

Applicant Response: The project is adjacent or within 1,000 feet of sensitive wildlife/plant site and areas. Appendix A shows buffer locations of sensitive wildlife and plants. The project is within 1,000 feet of the Columbia River and Moffett Creek, which both include sensitive wildlife. No sensitive plants were identified within 1,000 feet of the project.

As a result of the desktop and field surveys, Table 2 shows the following species within 1,000 feet of the project area.

Table 2 Sensitive Wildlife near the Project Area

Resource	Sensitive Wildlife
Moffett Creek	Coho Summer Steelhead Winter Steelhead Fall Chinook Spring Chinook Coastal Cutthroat Trout
Columbia River	Chinook Salmon Columbia River Chum Salmon Lower Columbia River Coho Salmon Snake River Sockeye Salmon Steelhead Green Sturgeon Pacific Eulachon

No impacts are anticipated to these species as the project does not impact either waterway.

(I) The Planning Director shall submit site plans for review to the U.S. Forest Service and the appropriate state agencies.

Applicant Response: ODOT acknowledges this requirement.

(J) The U.S. Forest Service wildlife biologists and/or 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 and/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 affects (including cumulative effects) to the wildlife or plant area or site.
- (4) Delineate the undisturbed 200 ft buffer on the site plan for sensitive plants and/or the appropriate buffer for sensitive wildlife areas or sites, including nesting, roosting and perching sites.

Applicant Response: ODOT acknowledges this requirement and has engaged USFS and ODFW biologists.

(a) - (c)

Applicant Response: N/A ODOT does not request a reconfiguration of buffer zones.

(K) Multnomah County, 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 developments or uses do not compromise the integrity and function of or result in adverse effects to the wildlife or plant area or site:

- (1) Published guidelines.
- (2) Physical characteristics of the subject parcel and vicinity.
- (3) Historic, current, and proposed uses in the vicinity of the sensitive wildlife/plant area or site.
- (4) Existing condition of the wildlife/plant area or site and the surrounding habitat and the useful life 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.

Applicant Response: The sensitive plants and priority habitats are not directly affected by the boreholes and temporary access route. The Map in Appendix A shows and Natural Resources memo in Appendix D describes the approximate locations and analyzes the likely impacts and mitigation ODOT will utilize to minimize impacts. Dan Keller, ODOT biologist prepared this memo.

- (6) The site plan is consistent with published guidance.

Applicant Response: ODOT followed ODFW's guidance in creating site plans to reduce impacts to fish and wildlife resource. See Appendix D minimization actions for additional detail.

- (7) The site plan activities coincide with periods when fish and wildlife are least sensitive to disturbance.

Applicant Response: ODOT will limit activities to periods when fish and wildlife are least sensitive to disturbance. See Appendix D minimization actions for additional detail.

- (8) The site plan illustrates that new developments and uses, including bridges, culverts, and utility corridors, shall not interfere with fish and wildlife passage.

Applicant Response: N/A – The boreholes and temporary access route will not impact fish and wildlife passage.

- (9) Maintain, protect, and enhance the integrity and function of Priority Habitats.

Applicant Response: Priority Habitats are adjacent to but not within the project limits, and the boreholes and temporary access route will not result in permanent impacts.

(L) The wildlife/plant protection process may terminate if Multnomah County...

Applicant Response: ODOT acknowledges this requirement.

(M) 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.

Applicant Response: No permanent adverse effects are anticipated as part of the project, and ODOT will restore the temporary impacts in kind.

(N) The Planning Director shall submit a copy of all field surveys (if completed) and mitigation plans to the U.S. Forest Service and appropriate state agencies.

Applicant Response: ODOT acknowledges this requirement, and has been engaging federal, state, and USFS wildlife staff.

(O) Multnomah County 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.

Applicant Response: ODOT acknowledges this requirement.

(P) 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.

Applicant Response: ODOT will use best management practices for sediment and erosion control measures.

(Q) 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.

Applicant Response: The boreholes and explorations will provide engineers the data needed to fully analyze and design the westbound I-84 Moffett Creek replacement bridge.

(1) 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.

Applicant Response: To create the eastbound bridge on another site besides the proposed site would require blasting and cliff wall modifications, which are considered priority habitat. Moving the location of the bridge would introduce safety and alignment concerns on I-84 and would have much more impact on the cliff habitat to the south of I-84.

(2) 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.

Applicant Response: The basic purpose of this project is to gather data to inform how to replace an aging interstate bridge. As such explorations are needed wherever a new retaining wall, cut, or bridge support will be needed, and cannot be moved due to the location of the existing I-84 alignment.

(3) 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.

Applicant Response: The bridge replacement project and therefore the location of the exploratory borehole locations are constrained by topography (cliffs to the south, the creek channel, the Historic Highway State Trail) and related to the existing grade and alignment of I-84 on where to put a replacement bridge. ODOT does not anticipate requesting a Management Plan amendment.

(R) The Mitigation Plan shall be prepared when:

(1) The proposed development or use is within a buffer zone (wetland, pond, lakes, riparian areas, or wildlife or plant areas or sites).

(2) There is no practicable alternative as determined by MCC 38.7075 (Q).

Applicant Response: The proposed use is within the buffer zone due to a lack of a practicable alternatives (discussed above). Mitigation includes avoidance and replanting with Gorge-specific species.

(S) In all cases, mitigation plans are the responsibility of the applicant and shall be prepared by an appropriate professional.

Applicant Response: ODOT's mitigation plan was prepared by the appropriate professional(s) including the following ODOT Staff:

Candice Diorio and Ken Sargeant, Wetlands Scientists

Dan Keller, Biologist

(T) 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...

Applicant Response: ODOT designed the proposed replacement bridge to reduce both permanent and temporary impacts to water resources and rare wildlife/plan areas and sites and their buffer zones.

(U) The applicant shall submit the mitigation plan to the Planning Director.

Applicant Response: Mitigation includes avoidance and replanting, and ODOT acknowledges the review requirements.

(V) A project applicant shall demonstrate sufficient fiscal, technical, and administrative competence to successfully execute a mitigation plan involving wetland creation.

Applicant Response: N/A, ODOT's is not proposing to create wetlands as part of this project.

(W) Mitigation plans shall include maps, photographs, and text. The text shall:

(1) Describe the biology and function of the protected resources (e.g. Wildlife/plant species, or wetland) that will be affected by a proposed use.

(2) Describe the physical characteristics of the subject parcel, past, present, and future uses, and the past, present, and future potential impacts to the protected resources.

(3) Explain the techniques that will be used to protect the protected resources and their surrounding habitat that will not be altered.

(4) Show how restoration, enhancement, and creation measures will be applied to ensure that the proposed use results in minimum feasible impacts to protected resources, their buffer zones, and associated habitats.

(5) Show how the proposed restoration, enhancement, or creation mitigation measures are NOT alternatives to avoidance.

Applicant Response: Appendix D includes ODOT's mitigation actions.

(X) At a minimum, a project applicant shall provide to the Planning Director 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.

Applicant Response: ODOT acknowledges this requirement.

(Y) A final monitoring report shall be submitted to the Planning Director for review upon completion of the restoration, enhancement, created or replacement activity.

Applicant Response: ODOT acknowledges this requirement.

(Z) Mitigation measures to offset impacts to re-sources and buffers shall result in no net loss of water quality, natural drainage, fish/wildlife/plant habitat, and water resources by addressing the following:

(1) Restoration and enhancement efforts shall be completed no later than one year after the protected resource or buffer zone has been altered, or as soon thereafter as is practicable.

(2) All natural vegetation within the buffer zone shall be retained to the greatest extent practicable.

(3) Habitat that will be affected by either temporary or permanent uses shall be rehabilitated to a natural condition.

(4) If this standard is not feasible or practical because of technical constraints, a protected resource of equal or greater benefit may be substituted, provided that no net loss of protected resource functions occurs and provided the County, in consultation with the appropriate state and federal agency, determine that such substitution is justified.

(5) Rare plants that will be altered shall be transplanted or replaced, to the maximum extent practicable.

(6) Nonstructural controls and natural processes shall be used to the greatest extent practicable.

Applicant Response: ODOT acknowledges these requirements.

(7) Wetland creation mitigation shall be deemed complete when the wetland is self-functioning for 5 consecutive years.

(8) Wetland restoration/enhancement can be mitigated successfully by donating appropriate funds to a non-profit wetland conservancy or land trust with explicit instructions that those funds are to be used specifically to purchase protection easements or fee title protection of appropriate wetlands acreage in or adjacent to the Columbia River Gorge meeting the ratios given above in MCC 38.7075 (Z) (6) (i).

Applicant Response: N/A – the project will not impact or need to mitigate for wetlands impacts.

§ 38.7085 SMA RECREATION RESOURCE REVIEW CRITERIA

(A) The following shall apply to all new developments and land uses:

(1) New developments and land uses shall be natural resource-based and not displace existing recreational use.

(2) Protect recreation resources from adverse effects by evaluating new developments and land uses as proposed in the site plan.

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

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

(5) The Facility Design Guidelines are intended to apply to individual recreation facilities.

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

Applicant Response: There will be no permanent recreational impacts or displacements as part of this project. Temporary impacts include State Trail use restrictions during boring/moving equipment during

work, which will be offset by flagging cyclists or hikers through when there are space restrictions on the State Trail.

(10) A demonstration that the proposed project or use will not generate traffic, either by type or volume, which would adversely affect the Historic Columbia River Highway, shall be required prior to approval.

Applicant Response: N/A – boreholes will not generate traffic.

(B) SMA Recreation Intensity Class Standards. The Recreation Intensity Classes are designed to protect recreation resources by limiting land development and land uses.

Applicant Response: The boreholes and temporary access route are in RIC 2.

(1) Intensity Class 1 (Very Low Intensity)

Applicant Response: N/A

(2) Intensity Class 2 (Low Intensity)

Social Setting: RIC 2 is characterized by opportunities to experience relaxation, physical fitness and outdoor learning, and where there is a moderate probability to experience solitude.

Applicant Response: The project will not expand or modify existing parking areas or induce more visitation/recreation to the area. It will not add a permanent parking area. ODOT is not proposing any of the allowed uses with this Project.



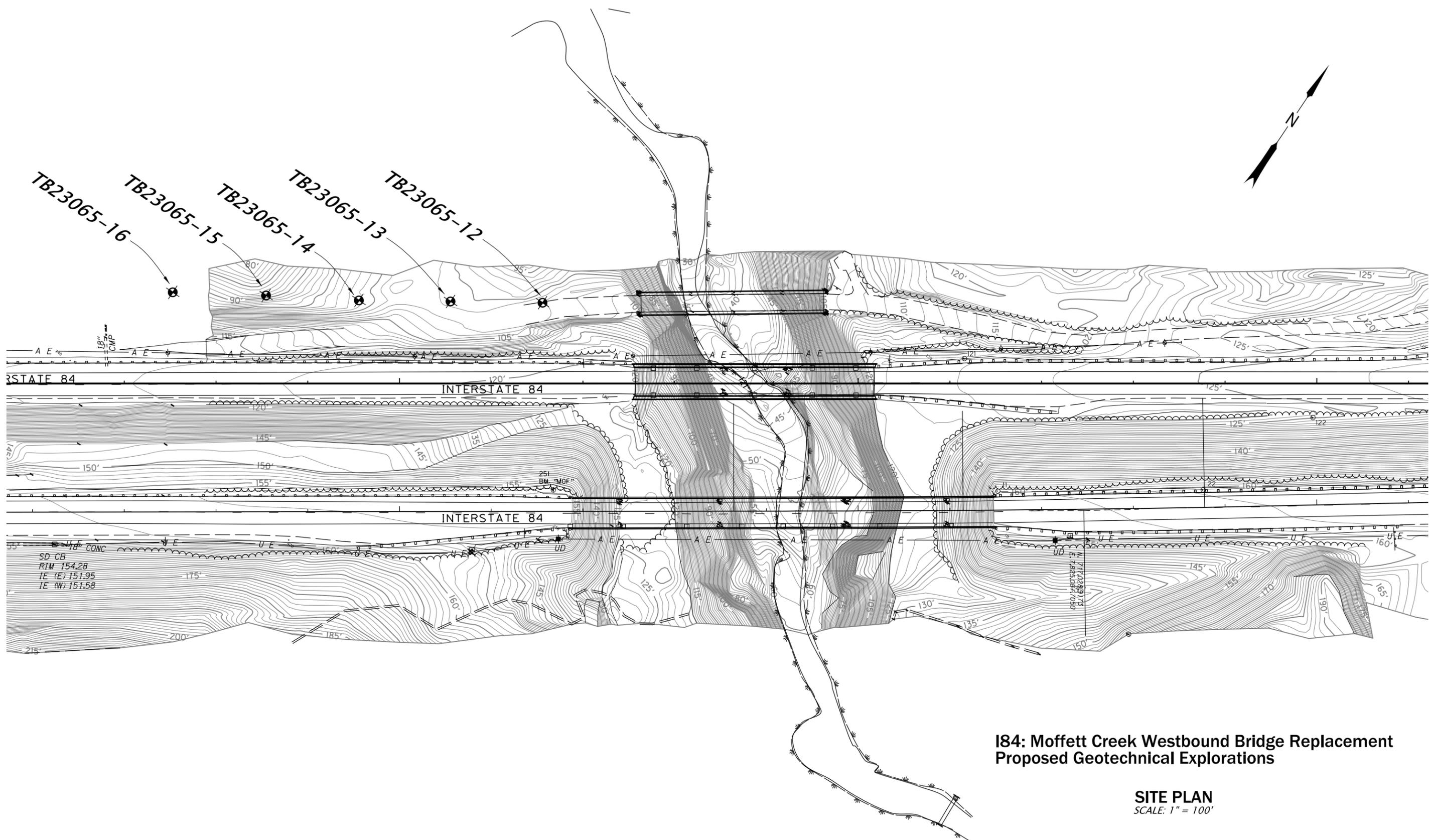
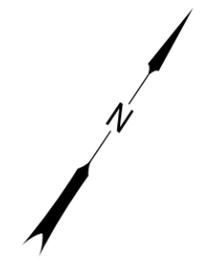
PCS:
PCS: WGS 1984 Web Mercator Auxiliary Sphere

Bore Location		taxlots_multnomah
Potential Access Route		State Parks
		State Boundary
		Moffett Creek Buffer

**MOFFETT CREEK BRIDGE
GEOTECHNICAL EXPLORATION**

OREGON DEPARTMENT OF TRANSPORTATION

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**184: Moffett Creek Westbound Bridge Replacement
Proposed Geotechnical Explorations**

SITE PLAN
SCALE: 1" = 100'

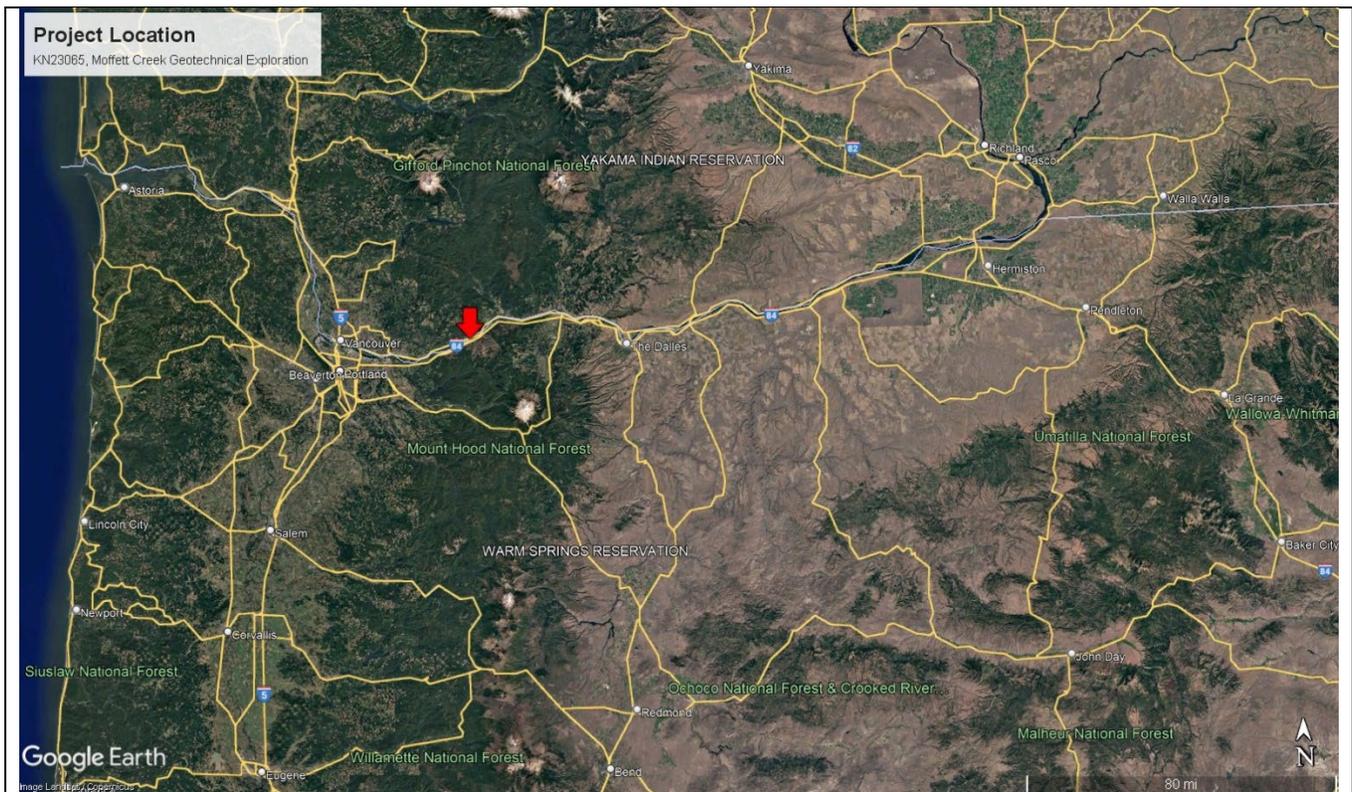
KN23065, I-84: Moffett Creek Bridge Geotechnical Exploration Biological and Water Resources Memo

Introduction

This memo documents project impacts to and mitigation for biological and water resources identified within the Columbia River Gorge National Scenic Area (CRGNSA) to comply with the CRGNSA Management Plan. Biological resources include rare plant and wildlife species and priority habitats identified within the Management Plan. Water resources include wetlands, ephemeral and permanent streams, rivers, lakes and ponds.

Project Description

In preparation for the design and construction of the I-84 west bound (WB) bridge over Moffett Creek, ODOT will be conducting geotechnical exploration and drilling operations on the northwest side of the WB Moffett Creek Bridge. Figure 1 shows the project vicinity. The drilling will involve up to five bore locations north of the I-84 embankment (see Figure 2). Drilling will require site access for the drill rig and a support vehicle. The drilling contractor will install a rudimentary access route that will avoid impacting as many trees as possible but will likely require some vegetation and tree removal. After the drilling is complete, ODOT will rehabilitate and seed the area for permanent stabilization. Geotechnical exploration is currently scheduled to occur in summer of 2026.



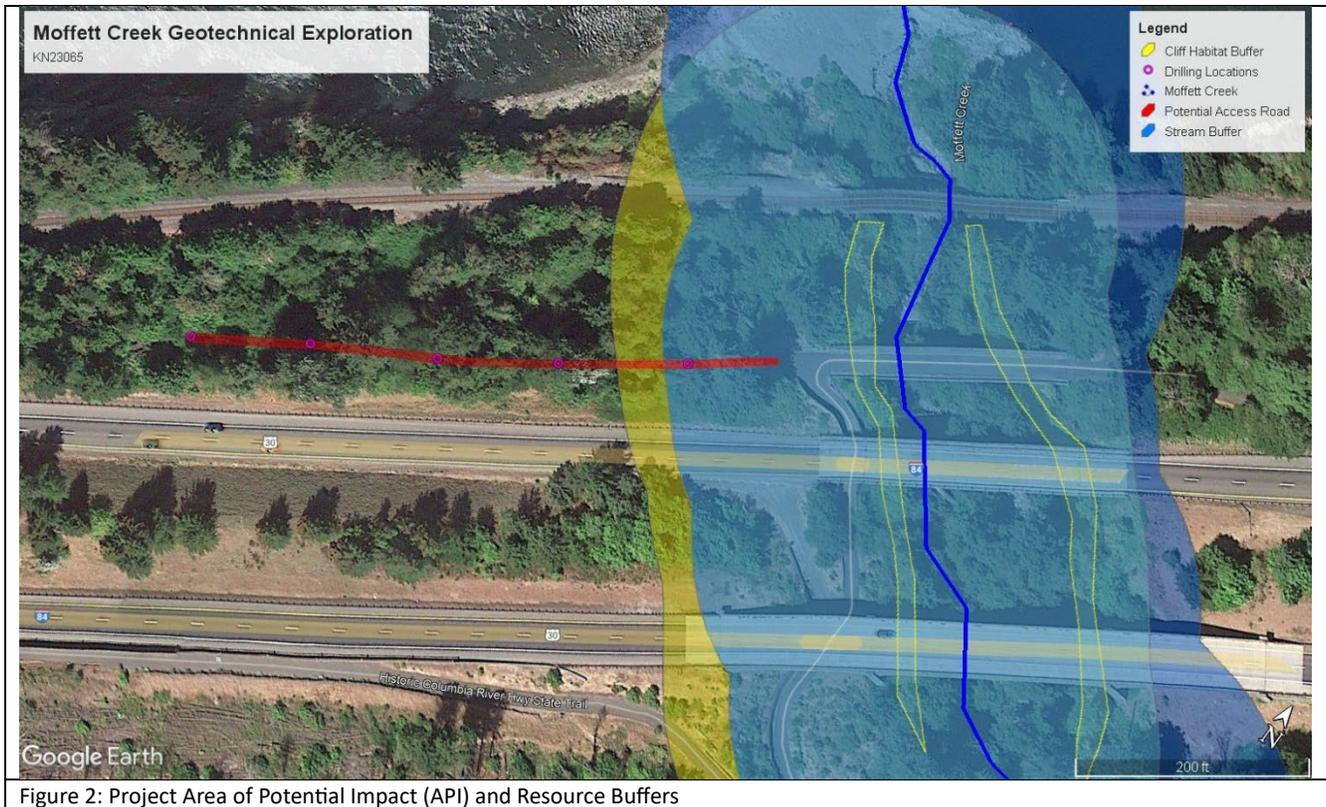


Figure 2: Project Area of Potential Impact (API) and Resource Buffers

Existing Conditions

The project area is highly disturbed, and the access road and boring locations are along the old alignment of the Historic Columbia River Highway (Historic Highway), and at the toe of the existing I-84 road embankment. The plant community is dominated by weedy species with English ivy, scotch broom and Himalayan blackberry being particularly pervasive (photo 1). The overstory consists of Douglas fir, big leaf maple, red alder, and poplar (photos 2,3). The cliff habitat and Moffett Creek to the east will not be directly impacted by this work.

Biological Resources

The Columbia River Gorge National Scenic Area (CRGNSA) Management Plan requires resource buffer identification, which typically extend 200 feet from the resource boundary. ODOT biologists and natural resource specialists established a study area that extended approximately 200 feet beyond the edge of the project API. ODOT biologists completed field surveys in the spring and summer of 2025. Staff conducted wildlife and plant surveys to determine the presence of certain plant and wildlife species based on the following categories:

- Endemic to the Columbia River Gorge and vicinity,
- Listed as endangered or threatened pursuant to federal or state endangered species acts, or (plants) having an Oregon Biodiversity Information Center (ORBIC) state or global rank of Level 1, 2 or 3
- Listed as sensitive by the Oregon Fish and Wildlife Commission.

ODOT biologists considered State and federally listed and endemic Columbia River Gorge species and conducted project field surveys, but no species of concern were found within 200 feet of the project limits.

Table 1 shows Columbia River Gorge endemic plant species as listed in the CRGNSA Management Plan. Staff surveyed and considered these species, but none were found within 200 feet of the project limits.

Table 1 Columbia Gorge and Vicinity Endemic Plant Species

Common Name	Scientific Name
Howell's bentgrass	<i>Agrostis howellii</i>
Hood River milk-vetch	<i>Astragalus hoodianus</i>
Smooth-leaf douglasia	<i>Douglasia laevigata</i> var. <i>laevigata</i>
Howell's daisy	<i>Erigeron howellii</i>
Columbia Gorge daisy	<i>Erigeron oregonus</i>
Klickitat biscuitroot	<i>Lomatium klickitatense</i>
Long-beard hawkweed	<i>Hieracium longiberbe</i>
Smooth desert parsley	<i>Lomatium laevigatum</i>
Suksdorf's desert parsley	<i>Lomatium suksdorfii</i>
Barrett's penstemon	<i>Penstemon barrettiae</i>
Obscure buttercup	<i>Ranunculus reconditus</i>
Oregon sullivantia	<i>Sullivantia oregana</i>
Columbia kittentails	<i>Synthyris stellate</i>

Priority habitats include aspen stands, caves, old-growth forest, Oregon white oak woodlands, prairies and steppe, riparian, wetlands, snags and logs, talus, cliffs, dunes, and winter deer/elk habitat. Field investigations confirmed the location and extent of the different priority habitats within the project area.

Additionally, the team excluded certain areas as buffers under the Management Plan. These areas are human made and are considered facilities under the code. As a result, the team removed I-84 and its operational right-of-way (ODOT managed area, generally consistent with back of ditch), trails, maintenance roads and their associated embankments, and other human-made structures from the buffered areas.

Impacts

ODOT will remove trees to allow space for the drill rig to access the proposed boring locations. Staff worked to avoid as much tree removal to the greatest extent possible, and the drill rig will be able to maneuver around many of the existing trees to reduce these impacts. Table 2 below categorizes the tree species and size classes that may be impacted by the drilling access.

Table 2: Impacted Tree Species and Size

Species	Sapling (<6 in. DBH)	6 – 12 in. DBH	12 – 24 in. DBH
Douglas Fir	-	6	7
Red Alder	8	9	-
Cottonwood	3	-	-
Big Leaf Maple	3	3	1
Total:	14	18	8

The estimated total number of removed trees represents the upper bounds of expected impacts. ODOT will work with the future contractor to minimize tree removal to impact fewer trees than indicated above.

In addition to tree removal, the drill rig will impact understory vegetation to access the drill sites. The drill rig will be able to traverse most of the vegetation without permanently damaging the plants, however some ground vegetation will be damaged during the drilling operation.

The access path and the first drilling location overlap with the buffers for Moffett Creek and the west bank cliff habitat (see figure 2). Cliff habitat buffer impacts have a total area of 792 square feet; stream habitat buffer impacts total 577 square feet. Since the cliff and stream buffer impacts overlap entirely, the total buffer impacts are 792 square feet.

Water Resources

No wetlands, streams or other water resources are within the project impact area. The buffer zone for Moffett Creek extends to the eastern edge of the project access route and includes drill site 1. Impacts to the Moffett Creek buffer total 577 square feet.

Mitigation and Minimization

ODOT will largely avoid impacts to sensitive biological resources and no impacts to endemic or State and Federally listed species are anticipated. ODOT will minimize impacts to existing vegetation and trees by maneuvering the drill rig around as many trees as possible to access the drilling locations. After the drilling operation is complete, ODOT will restore and reseed the area with an approved CRGNSA seed mix.

Conclusion

The access and drilling operation for the upcoming geotechnical exploration will be minimally impactful and result in the removal of up to 40 trees ranging in size from less than 6-inch DBH to 24-inch DBH. Actual tree removal numbers will likely be less than this estimate as the drill rig and support vehicle will be able to maneuver around many of the trees. The access route and first boring location partially overlap with the buffer area for the cliff habitat and Moffett creek to the west, resulting in approximately 792 square feet of buffer impact. This project will not result in any impacts to CRG endemic species, State listed, or federally listed ESA species. ODOT will reseed and rehabilitate the access route and boring locations with native seed mix at the conclusion of the geotechnical exploration activities.

Photos



Photo 1: Eastern end of access path, looking west.



Photo 2: Typical size classes of trees found along access path. Red alder in foreground with Douglas fir behind.



Photo 3: Small trees found along proposed access path.