



# Oregon

Kate Brown, Governor

## Department of Transportation

Terra Lingley  
123 NW Flanders  
Portland, OR 97209  
Phone: (503) 731-8232

CASE: T3-2017-9874

April 18, 2018

George Plummer  
1600 SE 190<sup>th</sup> Avenue  
Portland, OR 97233

RE: Application for a Conditional Use for a road spoils disposal site (Case T3-2017-9874)



BY:.....

Dear George,

Attached are the additional materials requested for the Coopey Quarry road spoils disposal site permit application requested by your letter dated January 4, 2018. Below are the summarized requested items and ODOT's response.

1. Concurrence findings regarding the cultural resources review from the USFS and SHPO. *Per an email from George Plummer to Matthew Diederich at OPRD, with a cc to Roy Watters from January 12, 2018 (and attached to this letter), the SHPO concurrence was received by Multnomah County and George indicated that the concurrence letter is sufficient for the permit review.*
2. Revise the narrative and mitigation plan to address mitigation for the buffers around the wetlands and pond buffer. *The Mitigation Report (Appendix E) has been updated with the requested information, and the narrative in the code response table has been amended to be consistent. The new Mitigation Report Revised in March 2018 should replace the original Mitigation Plan from November 8<sup>th</sup>.*
3. For the section with responses to MCC 38.7300, please add your response to each criterion. *The code table and responses have been updated to include each criterion and our response. The new code table will replace the original code table to complete the application.*
4. Please address each of the criteria in MCC 38.7350 in the narrative. *The code table and responses have been updated to include each criterion and our response. The new code table will replace the original code table to complete the application.*
5. Please provide a narrative addressing MCC 38.7350(B). *The original permit table included a narrative and cited Appendix H which includes the Spoils siting Feasibility and Suitability Analysis on Page 39. I have updated the narrative and have an extra copy of Appendix H in case it was inadvertently omitted in the original submittal. The new narrative in the code table is located on page 41.*

This letter and the attached packet of supporting documentation address the requested information and materials.

Please let me know if you have any questions or comments. My contact information is (503) 731-8232, or [terra.m.lingley@odot.state.or.us](mailto:terra.m.lingley@odot.state.or.us).

Sincerely,

Terra Lingley, Columbia Gorge National Scenic Area Coordinator, ODOT



## LINGLEY Terra M

---

**From:** YOUNG Mary E  
**Sent:** Friday, January 12, 2018 1:31 PM  
**To:** LINGLEY Terra M  
**Subject:** FW: SHPO Case Nbr SHPO Case No.: 17-1365, ODOT Key M17016, Coopey Disposal Site Project

fyi

---

**From:** WATTERS Roy  
**Sent:** Friday, January 12, 2018 1:27 PM  
**To:** YOUNG Mary E  
**Cc:** PELTZ Tova R  
**Subject:** FW: SHPO Case Nbr SHPO Case No.: 17-1365, ODOT Key M17016, Coopey Disposal Site Project

Hi Mary,

Mult Co has the information they need for archaeology.

Best,

Roy

**From:** George PLUMMER [<mailto:george.a.plummer@multco.us>]  
**Sent:** Friday, January 12, 2018 12:57 PM  
**To:** DIEDERICH Matthew \* OPRD  
**Cc:** WATTERS Roy  
**Subject:** Re: SHPO Case Nbr SHPO Case No.: 17-1365, ODOT Key M17016, Coopey Disposal Site Project

Matthew,

Your letter to Mr. Watter stating concurrence will suffice for our review. Thank you for forwarding it to us.

Sincerely,  
George Plummer

On Fri, Jan 12, 2018 at 11:44 AM, DIEDERICH Matthew \* OPRD <[Matthew.Diederich@oregon.gov](mailto:Matthew.Diederich@oregon.gov)> wrote:  
Click with Caution! Be Suspicious of Attachments, Links, and Requests for Payment or Login Information.

---

Roy,

Please find the SHPO's response to your request for comment on cultural resources at the above-identified project. This attachment serves as your file copy. If you have any questions, please feel free to contact me.

George, hopefully this is sufficient for your needs.

Thanks



Matt

Please note that my work schedule is Tuesday through Friday. Emails received Monday will be responded to on Tuesday, at the earliest.

Matt Diederich, MAIS  
Archaeologist  
Oregon State Historic Preservation Office  
725 Summer St. NE Suite C  
Salem, OR 97301  
503-986-0577  
[matthew.diederich@oregon.gov](mailto:matthew.diederich@oregon.gov)

--

George A. Plummer, Planner

*Multnomah County Land Use Planning*

*1600 SE 190<sup>th</sup>, Portland, OR 97233*

*503-988-0202*

## YOUNG Mary E

---

**From:** George PLUMMER <george.a.plummer@multco.us>  
**Sent:** Friday, January 12, 2018 1:31 PM  
**To:** YOUNG Mary E; PELTZ Tova R  
**Subject:** Re: SHPO Case Nbr SHPO Case No.: 17-1557, MULTCO T3-2017-9784, ODOT Coopey Quarry Eagle Creek Fire Response Project

Mary & Tova,

Just got the concurrence letter from SHPO, so the cultural resources portion of the application is complete.

Yesterday, I received an email from the US Forest Service Gorge staff regarding completeness review. I will be reviewing those comments next week.

Respectfully,  
George Plummer

On Fri, Jan 12, 2018 at 8:33 AM, George PLUMMER <[george.a.plummer@multco.us](mailto:george.a.plummer@multco.us)> wrote:  
Mary & Tova,

Matthew from SHPO says that they have not seen the archaeological report for Coopey Q. Please submit a copy of that report to SHPO for their concurrence on no effect.

Thanks,  
George Plummer

----- Forwarded message -----

**From:** **DIEDERICH Matthew \* OPRD** <[Matthew.Diederich@oregon.gov](mailto:Matthew.Diederich@oregon.gov)>  
**Date:** Thu, Jan 11, 2018 at 3:50 PM  
**Subject:** RE: SHPO Case Nbr SHPO Case No.: 17-1557, MULTCO T3-2017-9784, ODOT Coopey Quarry Eagle Creek Fire Response Project  
**To:** George PLUMMER <[george.a.plummer@multco.us](mailto:george.a.plummer@multco.us)>



Click with Caution - Be Suspicious of Attachments, Links, and Requests for Payment or Login Information.

George,

We have not received the report from ODOT.

Thanks

Matt

***Please note that my work schedule is Tuesday through Friday. Emails received Monday will be responded to on Tuesday, at the earliest.***

Matt Diederich, MAIS

Archaeologist

Oregon State Historic Preservation Office

725 Summer St. NE Suite C

Salem, OR 97301

503-986-0577

matthew.diederich@oregon.gov

**From:** George PLUMMER [mailto:[george.a.plummer@multco.us](mailto:george.a.plummer@multco.us)]

**Sent:** Thursday, January 11, 2018 3:26 PM

**To:** DIEDERICH Matthew \* OPRD

**Subject:** Re: SHPO Case Nbr SHPO Case No.: 17-1557, MULTCO T3-2017-9784, ODOT Coopey Quarry Eagle Creek Fire Response Project

Matthew,

ODOT should have submitted an archaeologist report for this site to SHPO, which we will need concurrence on. please let me know if they have not submitted that.

Respectfully,

George A. Plummer, Planner

*Multnomah County Land Use Planning*

1600 SE 190<sup>th</sup>, Portland, OR 97233

503-988-0202

On Wed, Jan 10, 2018 at 1:40 PM, DIEDERICH Matthew \* OPRD <[Matthew.Diederich@oregon.gov](mailto:Matthew.Diederich@oregon.gov)> wrote:

Click with Caution! Be Suspicious of Attachments, Links, and Requests for Payment or Login Information.

-----

George,

Please find the SHPO's response to your request for comment on cultural resources at the above-identified project. This attachment serves as your file copy. If you have any questions, please feel free to contact me.

Thanks

Matt

Please note that my work schedule is Tuesday through Friday. Emails received Monday will be responded to on Tuesday, at the earliest.

Matt Diederich, MAIS  
Archaeologist  
Oregon State Historic Preservation Office  
725 Summer St. NE Suite C  
Salem, OR 97301  
503-986-0577  
[matthew.diederich@oregon.gov](mailto:matthew.diederich@oregon.gov)

--

George A. Plummer, Planner

*Multnomah County Land Use Planning*

1600 SE 190<sup>th</sup>, Portland, OR 97233

503-988-0202

--

George A. Plummer, Planner

*Multnomah County Land Use Planning*

1600 SE 190<sup>th</sup>, Portland, OR 97233

503-988-0202

--

George A. Plummer, Planner

*Multnomah County Land Use Planning*

1600 SE 190<sup>th</sup>, Portland, OR 97233

503-988-0202

**COOPEY DISPOSAL SITE PROPOSAL**

**Oregon Department of Transportation**

**T1N R5E Section 14, TL 00600**

**Zoning: GSF**

**Chapter 38: Columbia River Gorge Management Area**

**APPLICABLE MULTNOMAH COUNTY LAND USE CODES AND RESPONSES**

**Submittal November 9, 2017**

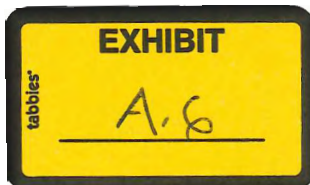
**Revised April, 18, 2018**

**RECEIVED**  
**APR 18 2013**

**BY: .....**

<b>APPLICABLE MULTNOMAH COUNTY CODE</b>	<b>PROVISIONS TO ADDRESS</b>	<b>APPLICABILITY AND ODOT RESPONSES</b>
<b>CHAPTER 38; GORGE MANAGEMENT AREA</b>		
<b>Part 1 – GENERAL PROVISIONS</b>		
<b>§ 38.1000- GENERAL MANAGEMENT AREA AND SPECIAL MANAGEMENT AREA</b>	The Columbia River Gorge National Scenic Area Act ("Act") divides the Columbia River Gorge National Scenic Area into two categories of land: General Management Area (GMA) and Special Management Area (SMA). The Act authorizes the Columbia River Gorge Commission to plan for the GMA and U.S. Department of Agriculture, Forest Service to plan for the SMA. GMA lands are shown on Multnomah County zoning maps with the prefix "GG" and SMA lands are shown as "GS". These prefixes are followed by a letter and/or numerals identifying the specific type of zoning (e.g. GGA-20 for GMA Agriculture, GSO for SMA Open Space, etc.)	<b>Applies.</b> The location of ODOT's property is located in a Special Management Area (SMA). The zoning is GSF 40 as shown on the attached CRGNSA zoning map.

Coopey Quarry  
Disposal Site 1





<p><b>§ 38.0045 REVIEW AND CONDITIONAL USE APPLICATIONS - SUBMITTAL REQUIREMENTS</b></p>	<p>(A) The following additional information shall be submitted for all review and conditional uses:</p>	<p><b>Applies.</b> The following sections document how ODOT has submitted the required information.</p> <p>ODOT proposes to use a state owned parcel previously used as a quarry, internally referred to as the Coopey Quarry, as a disposal site for material generated by landslides and other maintenance activities. Coopey Quarry was active before 1940, and was likely used to produce crushed rock during the construction of Interstate 84. Old survey maps suggest portions of the site were likely quarried by the UPRR during the realignment of the railroad in the 1930s. The site will be reclaimed and restored to match existing landforms and generally conform with the topographic survey dating from the late 1930s (pre-quarry state). The National Scenic Area zoning provisions that apply for the proposed disposal site are listed in the following applicable Chapter 38 provisions table. The required information is attached as Appendices.</p>
	<p>(1) A list of Key Viewing Areas from which the proposed use would be visible.</p>	<p><b>Applies.</b> During the pre-application conference with George Plummer, Multnomah County Land Use Planner, the applicant was provided a map with the list of applicable KVAs. The KVAs that are applicable are:</p> <ul style="list-style-type: none"> <li>• Cape Horn</li> <li>• SR-14</li> <li>• Columbia River</li> <li>• Crown Point</li> <li>• Portland Women's Forum</li> <li>• Larch Mtn. Road</li> <li>• I-84</li> <li>• Historic Columbia River Highway</li> </ul>
	<p>(2) A map of the project area. The map shall be drawn to scale. The scale of the map shall be large enough to allow the reviewing agency to determine the location and the extent of the proposed use and evaluate its effects on scenic, natural, cultural, and recreation resources.....</p>	<p><b>Applies.</b> See Appendix A Location Map and Site Concept Plan and Appendixes B and E include a site map prepared at the appropriate scale that shows the listed information in items (a)-(o) and is included in the Visual Resource Assessment.</p>

<p><b>§ 38.0045 REVIEW AND CONDITIONAL USE APPLICATIONS - SUBMITTAL REQUIREMENTS</b>  <b>Continued</b></p>	<p>(3) Elevation drawings shall show the appearance of proposed structures and shall include natural grade, finished grade, and the geometrical exterior of at least the length and width of structures as seen from a horizontal view. Elevation drawings shall be drawn to scale.</p>	<p><b>Does not apply.</b> No structures are associated with the proposed use, however, the Reclamation Plan for the quarry shows the existing grade and the proposed finished grade for the restoration/disposal material drawn to scale. See Appendix A Location Map and Site Concept Plan. The Reclamation Plan is attached as Appendix B, sheet 1 and 2 of 5.</p>
	<p>(B) Supplemental information will be required for:  (1) Forest practices in the Special Management Area,</p>	<p><b>Does not apply.</b> The proposed use is not a forest practice.</p>
	<p>(2) Production and development of mineral resources in the General Management Area,</p>	<p><b>Does not apply.</b> The proposal will not produce or develop mineral resources.  § 38.7350 (8) requires addressing (2) of this section, Production and development of mineral resources in the General Management Area. These provisions are addressed in the application.</p>
	<p>(3) Proposed uses visible from Key Viewing Areas, and</p>	<p><b>Applies.</b> The existing quarry site is visible from the I-84 Key Viewing Area for a very short period of time primarily from the westbound travel lanes. The existing quarry site is also visible from the Cape Horn KVA and the SR-14 KVA. Using the site as disposal site will reduce visual impacts over time and will enhance its visual sub ordinance in the surrounding landscape.</p> <p>Analysis of appearance of Proposed Use with perspective of site from Key Viewing Areas is attached in Appendix F and Appendix B sheet 1 or 5.</p>
	<p>(4) Proposed uses located near cultural resources, wetlands, streams, ponds, lakes, riparian areas, sensitive wildlife habitat, and sensitive plant sites.</p>	<p><b>Applies.</b> Information on locations of cultural resources (Appendix G), wetlands (Appendix D), streams, ponds, lakes, riparian areas (Appendix C &amp; E), sensitive wildlife habitat, and sensitive plant sites (Appendix C &amp; E) is attached. While the use is in the GSF40 zone, the provisions of §38.7350 apply since the site is a former quarry and is proposed for use as a road maintenance disposal site.</p>

<b>PART 3 – ADMINISTRATION AND PROCEDURES</b>		
<b>§ 38.0570 – PRE-APPLICATION CONFERENCE MEETING</b>	<p>(A) A pre-application conference is optional for uses eligible for Type II expedited review. For all other Type II or Type III applications, the applicant shall schedule and attend a preapplication conference with County staff to discuss the proposal.</p> <p>(B) To schedule a pre-application conference, the applicant shall contact the Land Use Planning Division and pay the appropriate conference fee. The purpose of the pre-application conference is for the applicant to provide a summary of the applicant's development proposal to staff and in return, for staff to provide feedback to an applicant on likely impacts, limitations, requirements, approval standards, fees and other information that may affect the proposal..</p> <p>(C) Notwithstanding any representations by County staff at a pre-application conference, staff is not authorized to waive any requirements of the County Code.</p> <p>(D) A pre-application conference shall be valid for a period of 6 months from the date it is held. If no application is filed within 6 months of the conference or meeting, the applicant must schedule and attend another conference before the County will accept a permit application.</p>	<p><b>Applies.</b> The proposal is a Type II use and requires a Pre-application conference that took place on June 15, 2017 at Multnomah County Department. The notes are attached as Appendix I.</p>

<b>PART 4 - ZONING DISTRICTS</b>		
<b>FOREST DISTRICTS – GGF AND GSF</b>		
§ 38.2005 AREA AFFECTED	MCC 38.2000 through 38.2095 shall apply to those areas designated GGF and GSF on the Multnomah County Zoning Map.	<b>Applies.</b> The proposed action site is designated GSF per the Multnomah County Zoning Map.
§ 38.2013 – ALLOWED USES	(B) (1) – (18)	<b>Does not apply.</b> ODOT’s proposed use is not an outright allowed use listed in (b) (1) through (18).
§ 38L.2015 - USES	References 38.1005 and 38.1015	<b>Does not apply.</b> ODOT’s proposed use is not an outright allowed use listed in either of these codes sections.
§ 38.2020– ALLOWED USES	(A) Allowed uses without review - (1) – (8)	<b>Does not apply.</b> The proposed use does not fit within any of the listed categories of allowed uses.
§ 38.2023 – EXPEDITED USES –		<b>Does not apply.</b> The proposed use is not listed.
§ 38.2025 – REVIEW USES	(A), (B), and (C)	<b>Does not apply.</b> The proposed use is not listed.
§ 38.2030 CONDITIONAL USES	(A) The following conditional uses may be allowed on lands designated GGF, pursuant to the provisions of MCC 38.0045 and 38.7300 - (1) through (11).	<b>Does not apply.</b> The proposed use is in an area zoned GSF40, not GGF.
	(B) The following conditional uses may be allowed on lands designated GSF, pursuant to the provisions of MCC 38.0045.	<b>Applies.</b> The proposal is located on GSF 40 lands.
	(9) Disposal sites managed and operated by the Oregon Department of Transportation or the Multnomah County Public Works Department for earth materials and any inter-mixed vegetation generated by routine or emergency/disaster public road maintenance activities within the Scenic Area, subject to MCC 38.7350.	<b>Applies.</b> The proposal is for a disposal site that will be operated by the Oregon Department of Transportation. Responses to MCC 38.7350 are listed in the table in PART 7 – SPECIAL USES.
<b>PART 6 - APPROVAL CRITERIA</b>		
§ 38.7010 APPLICABILITY	With the exception of Primary Uses, no building, structure or land shall be used and no building or structure shall be hereafter erected, altered or enlarged in the Columbia River Gorge National Scenic Area except when approved pursuant to MCC 38.0530 (B) or (C) or 38.7090.	<b>Applies.</b> This is a new use on the site. As a conditional use this application will be considered using the Type II (Hearings Officers) approval process. These decisions are appealable to the Columbia River Gorge Commission.

<p><b>§ 38.7015 APPLICATION FOR NSA SITE REVIEW AND CONDITIONAL USE REVIEW</b></p>	<p>An application for NSA Expedited Development Review, Site Review or Conditional Use Review shall address the applicable criteria for approval, under MCC 38.7035 through 38.7100.</p>	<p><b>Applies.</b> The proposed use is a conditional use.</p>
<p><b>§ 38.7020 REQUIRED FINDINGS</b></p>	<p>A decision on an application for NSA Expedited Development Review, Site Review or Conditional Use Review shall be based upon findings of consistency with the criteria for approval specified in MCC 38.7035 through 38.7100 as applicable.</p>	<p><b>Applies.</b> ODOT has submitted all information to meet the required findings. The County will review this information and make appropriate findings based on the available information.</p>
<p><b>§ 38.7040 SMA SCENIC REVIEW CRITERIA</b></p>	<p>The following scenic review standards shall apply to all Review and Conditional Uses in the Special Management Area of the Columbia River Gorge National Scenic Area with the exception of rehabilitation or modification of historic structures eligible or on the National Register of Historic Places when such modification is in compliance with the national register of historic places guidelines: (A) All Review Uses and Conditional Uses visible from KVAs. This section shall apply to proposed development on sites topographically visible from KVAs::</p>	<p><b>Applies.</b> The proposed use has been evaluated to ensure compliance with the scenic standard that applies for the proposed use and location.</p> <p>The proposed use has been evaluated from the following list of KVAs, also listed in § 38.0045 REVIEW AND CONDITIONAL USE APPLICATIONS - SUBMITTAL REQUIREMENTS A (1):</p> <ul style="list-style-type: none"> <li>• Cape Horn</li> <li>• SR-14</li> <li>• Columbia River</li> <li>• Crown Point</li> <li>• Portland Women's Forum</li> <li>• Larch Mtn. Road</li> <li>• I-84</li> <li>• Historic Columbia River Highway</li> </ul> <p>Analysis of appearance of Proposed Use with perspective of site from Key Viewing Areas is attached in Appendix F and Appendix B sheet 1 or 5.</p>

<p><b>§ 38.7040 SMA SCENIC REVIEW CRITERIA</b> <b>Continued</b></p>	<p>(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.</p>	<p><b>Applies.</b> The site is located on ODOT lands within the Coniferous Woodland, Oak-Pine Woodland Landscape Setting with a Forest Designation. According to the Required SMA Scenic Standards Table in 38.7040 the scenic standard is <b>VISUALLY SUBORDINATE</b>.</p> <p><i>Visually Subordinate Definition: The relative visibility of a structure or use where that structure or use does not noticeably contrast with the surrounding landscape, as viewed from specified vantage point (generally a Key Viewing Area). Structures which are visually subordinate may be partially visible, but are not visually dominant in relation to their surroundings. Visually subordinate forest practices in the Special Management Area shall repeat form, line, color, or texture common to the natural landscape, while changes in their qualities of size, amount, intensity, direction, pattern, etc. shall not dominate the natural landscape setting.</i></p> <p>The existing quarry is presently visually evident from Cape Horn and SR 14 Columbia River, Crown Point, Women's Forum Larch Mountain Rd, I-84, HCRH, Appendix F. The proposal to develop a disposal site and eventual reclamation/ restore the landscape of the quarry will minimize the visual evidence and enhance visual sub ordinance of the site through contouring and planting and thus enhancing the National Scenic Area.</p>
	<p>(2) The required SMA scenic standards for all development and uses are summarized in the following table.</p> <p>REQUIRED SMA SCENIC STANDARDS LANDSCAPE SETTING LAND USE DESIGNATION SCENIC STANDARD Coniferous Woodland, Oak-Pine Woodland Forest (State Owned Lands), <b>VISUALLY SUBORDINATE</b></p>	<p><b>Applies.</b> The applicable SMA scenic standard for the Landscape Setting is <u>Coniferous Woodland, Oak-Pine Woodland</u>. The zoning district is Forest. The SMA standard to meet is <u><b>VISUALLY SUBORDINATE</b></u>.</p>

<p><b>§ 38.7040 SMA SCENIC REVIEW CRITERIA</b> <b>Continued</b></p>	<p>(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.</p>	<p><b>Applies.</b> The scenic standard of “Visual Subordinance” will be achieved through land contours and plantings. The proposal to develop a disposal site and eventual reclamation of the quarry will minimize the visual evidence and enhance visual sub ordinance of the site through contouring and planting and thus enhancing the National Scenic Area.</p> <p>Visual Assessment attached as Appendix F.</p>
	<p>(4) Proposed developments or land use shall be sited to achieve the applicable scenic standards. Development shall be designed to fit the natural topography and to take advantage of vegetation and land form 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.</p>	<p><b>Applies.</b> The scenic standard of “Visual Subordinance” has been met through design of the proposed use of the site as a disposal and quarry reclamation site as described in the Visual Assessment attached as Appendix F. Berms will be used to visually buffer the most existing viewsheds from KVAs namely I-84. These berms will be planted with native trees and shrubs.</p>
	<p>(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.</p>	<p><b>Applies.</b> The scenic standard of “Visually Subordinance” has been met through design of the proposed use of the site as a disposal and quarry reclamation site as described in the Visual Assessment attached as Appendix F.</p>
	<p>(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.</p>	<p><b>Applies.</b> <u>Visually Subordinance</u> has been met by introducing berms to limit view corridors into the quarry floor from KVAs namely Interstate 84. The berms are located within the identified buffers but will enhance the wetland, riparian functions.</p>

<p>§ 38.7040 SMA SCENIC REVIEW CRITERIA Continued</p>	<p>(7) Proposed developments shall not protrude above the line of a bluff, cliff, or sky-line as seen from Key Viewing Areas.</p>	<p><b>Applies.</b> The proposed contours associated with the proposed disposal site will help blend with existing topography. The existing quarry is visually evident from SR 14 and Cape Horn. The rim of the quarry presents an unnatural horizontal band within the broader landscape setting. The existing quarry contrasts noticeably with surrounding environment. The proposal to recontour the site and fill the quarry will contribute to the site overall visually sub ordinance.</p>
	<p>(8) 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 compliance with this standard is not feasible considering the function of the structure.</p>	<p><b>Does not apply.</b> No structures are proposed.</p>
	<p>(9) 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.</p>	<p><b>Applies.</b> The primary means to meet the visually subordination standard will be through the use of topography and the introduction berms. The berms will include large boulders and will be designed to mimic the surrounding landscape. The site will be sculpted to generally match the original topography shown in the 1930s survey. This historic survey demonstrates the pre-quarry condition. The slope was generally undulating and sloping to the north to the Columbia River.</p> <p>The proposed use, reclamation of an inactive quarry through use as a disposal site for material from various ODOT maintenance activities, will require berms to achieve the scenic standard of Visual Subordination from the I-84 KVA. The berms will be planted with native vegetation. Please see Appendix F, which includes the Visual Assessment for the proposed use and identifies areas for screening through documentation and analysis of existing visual conditions and exposure. The Reclamation Plan (Appendix B) includes construction of berms in designated locations to provide the most effective screening from key viewing areas.</p>



<p><b>§ 38.7040 SMA SCENIC REVIEW CRITERIA</b> <b>Continued</b></p>	<p>(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.</p>	<p><b>Applies.</b> ODOT will plant/landscape the berms with native trees and shrubs to provide more effective screening of the site from the I-84 KVA. The Reclamation Plan has been developed by the ODOT Region 1 Landscape Architect. The planting proposal concept is to provide the maximum amount of vegetative screening in the shortest growing time, and to include evergreen/coniferous species to provide every season screening of the disposal site. The planting plan can be found in Appendix B.</p>
	<p>(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.</p>	<p><b>Applies.</b> The berms will be seeded and planted as part of the phase I development. Ideally, ODOT staff would like to plant the berms this coming fall to ensure vitality of the plant material pending approval of the conditional use application.</p>
	<p>(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).</p>	<p><b>Applies.</b> The Scenic Resources Implementation Handbook has been referenced during the development of the planting plan. Additionally, ODOT staff have been coordinating with the USFS Landscape Architect, Morai Helfen to ensure compatible species.</p>

<p>§ 38.7040 SMA SCENIC REVIEW CRITERIA Continued</p>	<p>(10) 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 <i>Scenic Resources Implementation Handbook</i> will include a recommended palette of colors as dark or darker than the colors in the shadows of the natural features surrounding each landscape setting</p>	<p><b>Does not apply.</b> No constructed structures are proposed.</p>
	<p>(11) The exterior of structures on lands seen from key viewing areas shall be composed of non-reflective materials or materials with low reflectivity. The <i>Scenic Resources Implementation Handbook</i> will include a recommended list of exterior materials. These recommended materials and other materials may be deemed consistent with this guideline, including those where the specific application meets approval thresholds in the “Visibility and Reflectivity Matrices” in the <i>Implementation Handbook</i>. Continuous surfaces of glass unscreened from key viewing areas shall be limited to ensure meeting the scenic standard. Recommended square footage limitations for such surfaces will be provided for guidance in the <i>Implementation Handbook</i>.</p>	<p><b>Does not apply.</b> No constructed structures are proposed.</p>

§ 38.7040 SMA SCENIC REVIEW CRITERIA Continued	(12) Any exterior lighting shall be sited, limited in intensity, 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.	<b>Does not apply.</b> No lighting is proposed.
	(13) Seasonal lighting displays shall be permitted on a temporary basis, not to exceed three months duration.	<b>Does not apply.</b> No seasonal lighting is proposed.
	(B) The following shall apply to all lands with-in SMA landscape settings regardless of visibility from KVAs (includes areas seen from KVAs as well as areas not seen from KVAs):	<b>Applies.</b> The proposed use is in an SMA; the landscape setting is Coniferous-Oak Woodland.
	(2) Coniferous Woodlands and Oak-Pine Woodland: Woodland areas shall retain the overall appearance of a woodland landscape. New developments and land uses shall retain the overall visual character of the natural appearance of the Coniferous and Oak/Pine Woodland landscape.	<b>Applies.</b> The proposed use of the site for disposal of material from emergency landslide events and maintenance activities. Use of the former quarry site as a disposal site requires a Reclamation Plan that once filled the reclaimed site will blend with the surrounding coniferous and oak-pine woodland landscape. See the Reclamation Plan attached as Appendix B.
	a) Buildings in the Coniferous Woodland landscape setting shall be encouraged to have a vertical overall appearance and a horizontal overall appearance in the Oak-Pine Woodland landscape setting.	<b>Does not apply.</b> No buildings are proposed.
	(b) Use of plant species native to the landscape setting shall be encouraged. Where non-native plants are used, they shall have native appearing characteristics.	<b>Applies.</b> Only native plant material has been listed for use in the reclamation site. See Appendix B.

<p><b>§ 38.7040 SMA SCENIC REVIEW CRITERIA</b> <b>Continued</b></p>	<p>(C) SMA Requirements for KVA Foregrounds and Scenic Routes (1) All new developments and land uses immediately adjacent to the Historic Columbia River Highway, Interstate 84, and Larch Mountain Road shall be in conformance with state or county scenic route standards.</p>	<p><b>Applies.</b> The proposed is immediately adjacent to or within the foreground of the I-84 and HCRH KVAs. The proposal is in conformance with the HCRH Master Plan as the proposed use is not visible from the HCRH Scenic Route. Additionally, the proposal is consistent with the I-84 Corridor Strategy. See attached Analysis of appearance of Proposed Use with perspective of site from Key Viewing Areas is attached in Appendix F and Appendix B sheet 1 or 5.</p>
	<p>(2) 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 MCC 38.7040(A).</p>	<p><b>Does not apply.</b> The proposed use is not immediately adjacent to or within the foreground of the listed KVAs. The site is immediately adjacent but is not topographically visible.</p>
	<p>(3) Right-of-way vegetation shall be managed to minimize visual impact of clearing and other vegetation removal as seen from Key Viewing Areas. Roadside vegetation management should enhance views out from the highway (vista clearing, planting, etc.).</p>	<p><b>Does not apply.</b></p>
	<p>(4) Encourage existing and require new road maintenance warehouse and stockpile areas to be screened from view from Key Viewing Areas.</p>	<p><b>Applies.</b> The proposed use will not include a warehouse, but may include stockpiles as part of the disposal of native material generated by landslide events and maintenance activities that impact I-84 and the HCRH. The disposal site will be screened from all views from KVAs through the use of berms and landscaping.</p>
	<p>(5) Development along Interstate 84 and the Historic Columbia River Highway shall be consistent with the scenic corridor strategies developed for these roadways.</p>	<p><b>Applies.</b> The proposed use is consistent with the scenic corridor strategies for I-84 and the HCRH.. The strategies can be reviewed at <a href="http://gorgevitalsigns.org/Misc/I84_201201.pdf">http://gorgevitalsigns.org/Misc/I84_201201.pdf</a> The HCRH Master Plan at <a href="http://www.oregon.gov/ODOT/Regions/Documents/HCRH/Master-Plan-Intro-History-HCRH.pdf">http://www.oregon.gov/ODOT/Regions/Documents/HCRH/Master-Plan-Intro-History-HCRH.pdf</a></p>

<p><b>§ 38.7040 SMA SCENIC REVIEW CRITERIA</b> <b>Continued</b></p>	<p>(D) SMA Requirements for areas not seen from KVAs Unless expressly exempted by other provisions in MCC 38.7040, colors of structures on sites not visible from key viewing areas shall be earth-tones found at the specific site. The specific colors or list of acceptable colors shall be approved as a condition of approval, drawing from the recommended palette of colors included in the Scenic Resources Implementation Handbook.</p>	<p><b>Does not apply.</b> No structures will be constructed on the proposed disposal site and reclamation project.</p>
<p><b>§ 38.7050 SMA CULTURAL RESOURCE REVIEW CRITERIA</b></p>	<p>(A) through (H).</p>	<p><b>Applies.</b> Criteria A through H have been satisfied. ODOT has contracted with appropriate technical professionals to complete all required surveys, research and coordination with the appropriate agencies. The contracts and the results have been reviewed by qualified ODOT professional staff.</p> <p>The results of the Cultural Resource Review (Built and Archaeology) have been submitted to the appropriate state and federal staff for their review and concurrence. Copies of the appropriate concurrence/clearance letters are attached in Appendix G.</p>
<p><b>§ 38.7075 SMA NATURAL RESOURCE REVIEW CRITERIA</b> All new developments and land uses shall be evaluated using the following standards to ensure that natural resources are protected from adverse effects. Comments from state and federal agencies shall be carefully considered.</p>	<p>(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). These buffer zones are measured horizontally from a wetland, stream, lake, or pond boundary as defined in MCC 38.7075 (2)(a) and (2)(b).</p>	<p><b>Applies.</b> Appendix C &amp;D includes the Wetlands and Waters Delineation Report for Coopey Quarry. This report identifies three wetlands and one pond (waters of the state) on the property. Much of the site is a former quarry and highly disturbed with little soil and was not considered buffer. The rest of the site is mostly buffer for water resources and the man-made quarry wall/cliff.</p> <p>The Mitigation report (Appendix E) identifies buffer impacts, mitigation and site restoration.</p>

**§ 38.7075 SMA NATURAL RESOURCE  
REVIEW CRITERIA  
Continued**

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

**Applies.**

To access the proposed disposal site, ODOT will impact 0.15 acre of buffer. Appendix E contains a mitigation report that discusses impacts to natural resources, their buffers and proposes mitigation for these impacts. This one lane road with a turn out is the minimum necessary for site access.

**§ 38.7075 SMA NATURAL RESOURCE  
REVIEW CRITERIA  
Continued**

(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:
  - 1. The wetland within the right-of-way is a drainage ditch not part of a larger wetland outside of the right-of-way.
  - 2. The wetland is not critical habitat.
  - 3. Proposed activities within the right-of-way would not adversely affect a wetland adjacent to the right-of-way.

**Applies.** Appendix E contains the Coopey Quarry Mitigation Report which identifies natural resources and their buffers. The pond, wetlands, Coopey Creek and the quarry wall (cliff) were all considered to require a 200 foot NSA buffer. Previously developed areas (the quarry) were excluded from buffers similar to the NSA analysis used for ODOT's HCRH Trail: Wyeth to Starvation Creek which excluded gravel parking lots and existing roads.

<p><b>§ 38.7075 SMA NATURAL RESOURCE REVIEW CRITERIA</b> <b>Continued</b></p>	<p>(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.</p>	<p><b>Does not apply.</b> The buffer width will not be increased; none of the listed conditions (a) through (c) are present in the proposed use area.</p>
	<p>(4) Buffer zones can be reconfigured if a project applicant demonstrates all of the following:  (a) The integrity and function of the buffer zones is maintained.  (b) The total buffer area on the development proposal is not decreased.  (c) The width reduction shall not occur within another buffer.  (d) 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.</p>	<p><b>Does not apply.</b> The buffer zones will not be reconfigured.</p>



<p><b>§ 38.7075 SMA NATURAL RESOURCE REVIEW CRITERIA</b> <b>Continued</b></p>	<p>(5) Requests to reconfigure buffer zones shall be considered if an appropriate professional (botanist, plant ecologist, wildlife biologist, or hydrologist), hired by the project applicant (1) identifies the precise location of the sensitive wildlife/plant or water resource, (2) describes the biology of the sensitive wildlife/plant or hydrologic condition of the water resource, and (3) demonstrates that the proposed use will not have any negative effects, either direct or indirect, on the affected wildlife/plant and their surrounding habitat that is vital to their long-term survival or water resource and its long term function.</p>	<p><b>Does not apply.</b> The buffer zones will not be reconfigured.</p>
	<p>(6) The local government shall submit all requests to re-configure sensitive wild-life/plant or water resource buffers to the U.S. 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 op-posing conclusion.</p>	<p><b>Does not apply.</b> The buffer zones will not be reconfigured.</p>
	<p>(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.</p>	<p><b>Applies.</b> Native plants are shown on the planting plan see Appendix B.</p>
	<p>(C) The applicant shall be responsible for identifying all water resources and their appropriate buffers.</p>	<p><b>Applies.</b> Qualified ODOT staff has identified the water resources in the Wetlands and Waters Delineation Report for Coopey Quarry Appendix D.</p>

**§ 38.7075 SMA NATURAL RESOURCE  
REVIEW CRITERIA  
Continued**

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

(1) The approximate location and extent of wetlands in the Scenic Area is shown on the National Wetlands Inventory (U. S. Department of the Interior 1987). In addition, the list of hydric soils and the soil survey maps shall be used as an indicator of wet-lands.

(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 '1987 Corps of Engineers Wetland Delineation Manual (on-line Edition)'.

(4) All wetlands delineations shall be conducted by a professional who has been trained to use the federal delineation procedures, such as a soil scientist, botanist, or wetlands ecologist.

**Applies.** Qualified ODOT staff has identified the water resources in the Wetlands and Waters Delineation Report for Coopey Quarry (Appendix D) using the methods described here.

(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.

**Applies.** Qualified ODOT staff has identified the water resources in the Wetlands and Waters Delineation Report for Coopey Quarry (Appendix D) using the methods described here.

<p><b>§ 38.7075 SMA NATURAL RESOURCE REVIEW CRITERIA</b> <b>Continued</b></p>	<p>(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 county will ask for technical assistance from the U.S. Forest Service to render a final delineation.</p>	<p><b>Applies.</b> The local government may verify the accuracy of the Wetlands and Waters Delineation Report for Coopey Quarry (Appendix D).</p>
	<p>(G) Buffer zones shall be undisturbed unless the following criteria have been satisfied: (1) The proposed use must have no practicable alternative as determined by the practicable alternative test. Those portions of a proposed use that have a practicable alternative will not be located in wetlands, stream, pond, lake, and riparian areas and/or their buffer zone.</p>	<p><b>Applies.</b> To access the proposed disposal site, ODOT will impact 0.15 acre of buffer. Appendix E contains a mitigation report that discusses impacts to natural resources, their buffers and proposes mitigation for these impacts. This one lane road with a turn out is the minimum necessary for site access.</p>
	<p>(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. (b) Impacts to the wetland must be the last possible documented alternative in fixing the public safety concern or completing the restoration/enhancement project. (c) The proposed project minimizes the impacts to the wetland.</p>	<p><b>Does not apply.</b> No wetland draining or filling is proposed.</p>

✓

**§ 38.7075 SMA NATURAL RESOURCE  
REVIEW CRITERIA  
Continued**

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

**Applies.** The project will remove 1,000 linear feet of man-made quarry wall/cliff and 0.15 acre of NSA buffer.

As mitigation for these impacts ODOT will:

- Restore Coopey Quarry creating 7.26 acres of buffer
- Restore the original 0.15 acre of buffer impact.
- Utilize large wood cut from the site as downed logs
- Remove English Ivy and Himalayan blackberry from 2.60 acre of existing NSA buffer. See Appendix E Coopey Quarry Mitigation Report.

(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. Sensitive Wildlife Areas are those areas depicted in the wildlife inventory and listed in Table 2 of the Management Plan titled "Types of Wildlife Areas and Sites Inventoried in the Columbia Gorge", including all Priority Habitats Table. Sensitive Plants are listed in Table 3 of the Management Plan, titled "Columbia Gorge and Vicinity Endemic Plant Species." The approximate locations of sensitive wildlife and/or plant areas and sites are shown in the wildlife and rare plant inventory.

**Does not apply.** No sensitive wildlife or plants were found within the project area.

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

<p><b>§ 38.7075 SMA NATURAL RESOURCE REVIEW CRITERIA</b>  <b>Continued</b></p>	<p>(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:</p> <ul style="list-style-type: none"> <li>(1) Identify/verify the precise location of the wildlife and/or plant area or site.</li> <li>(2) Determine if a field survey will be required.</li> <li>(3) Determine, based on the biology and habitat requirements of the affected wild-life/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. This would include considering the time of year when wildlife or plant species are sensitive to disturbance, such as nesting, rearing seasons, or flowering season.</li> <li>(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.</li> <li>(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.</li> </ul>	<p><b>Applies.</b> The US Forest wildlife biologists and state biologist may review site plans and field survey documentation to verify its accuracy.</p>
------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------

**§ 38.7075 SMA NATURAL RESOURCE  
REVIEW CRITERIA  
Continued**

	<p>(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 sensitive wildlife/plant or water resource, (2) de-scribes the biology of the sensitive wildlife/plant or hydrologic condition of the water resource, and (3) demonstrates that the proposed use will not have any negative effects, either direct or indirect, on the affected wild-life/plant and their surrounding habitat that is vital to their long-term survival or water resource and its long term function.</p>	<p><b>Does not apply.</b> No sensitive wildlife or plants or their buffers were found within the project area.</p>
	<p>(c) The local government shall submit all requests to re-configure sensitive wildlife/plant or water resource buffers to the U.S. 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 zones 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.</p>	<p><b>Does not apply.</b> No sensitive wildlife or plants were found within the project area.</p>

**§ 38.7075 SMA NATURAL RESOURCE  
REVIEW CRITERIA  
Continued**

(K) The local government, in consultation with the State and federal wildlife biologists and/or botanists, shall use the following criteria in re-viewing 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 regarding the protection and management of the affected wildlife/plant species. Examples include: the Oregon Department of Forestry has prepared technical papers that include management guidelines for osprey and great blue heron; the Washington Department of Wildlife has prepared similar guidelines for a variety of species, including the western pond turtle, the peregrine falcon, and the Larch Mountain salamander (Rodrick and Milner 1991).
- (2) Physical characteristics of the subject parcel and vicinity, including topography and vegetation.
- (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.

**Does not apply.** No sensitive wildlife or plants were found within the project area.

<p><b>§ 38.7075 SMA NATURAL RESOURCE REVIEW CRITERIA</b> <b>Continued</b></p>	<p>(6) The site plan is consistent with the "Oregon Guidelines for Timing of In-Water Work to Protect Fish and Wildlife Resources" (Oregon Department of Fish and Wildlife 2000).</p>	<p><b>Does not apply.</b> There is no in water work for this project.</p>
	<p>(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.</p>	<p><b>Does not apply.</b> No sensitive wildlife or plants were found within the project area.</p>
	<p>(8) The site plan illustrates that new developments and uses, including bridges, culverts, and utility corridors, shall not interfere with fish and wildlife passage.</p>	<p><b>Applies.</b> The disposal site once completed will improve wildlife passage. Fish passage is not affected by the proposal.</p>
	<p>(9) Maintain, protect, and enhance the integrity and function of Priority Habitats (such as old growth forests, talus slopes, and oak woodlands) as listed in the Priority Habitats Table. 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.</p>	<p><b>Applies.</b> The man-made quarry wall / cliff face will be lost when the disposal site is filled. The quarry wall is about 30-40 feet high and extends 1,000 feet along the southern edge of the project. The quarry wall, although man-made, provides cliff habitat. The cliffs are approximately 1,000 linear feet long, of which approximately 500ft is vegetated by several species of fern, English ivy and blackberry and transitions into a vegetated steep slope. The remaining 500ft are relatively unvegetated and contain a fissure running horizontally approximately 15ft from the top.</p> <p>The overall project will have a net environmental benefit discussed in the Coopey Quarry Mitigation Report, Appendix E.</p>



<p><b>§ 38.7075 SMA NATURAL RESOURCE REVIEW CRITERIA</b> <b>Continued</b></p>	<p>(L) The wildlife/plant protection process may terminate if the local government, in consultation with the U.S. Forest Service and state wild-life agency or Heritage program, determines (1) the sensitive 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, and (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.</p>	<p><b>Does not apply.</b> No sensitive wildlife or plants were found within the project area.</p>
	<p>(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.</p>	<p><b>Does not apply.</b> No sensitive wildlife or plants were found within the project area.</p>

<p><b>§ 38.7075 SMA NATURAL RESOURCE REVIEW CRITERIA</b> <b>Continued</b></p>	<p>(N) The local government shall submit a copy of all field surveys (if completed) and mitigation plans to the U.S. 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. 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.</p>	
	<p>(O) 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 sensitive wildlife/plant area or site.</p>	<p><b>Does not apply.</b> No sensitive wildlife or plants were found within the project area.</p>

**§ 38.7075 SMA NATURAL RESOURCE  
REVIEW CRITERIA**

**Continued**

(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.

**§ 38.7075 SMA NATURAL RESOURCE  
REVIEW CRITERIA  
Continued**

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

(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, wildlife or plant areas and/or sites.

(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, wildlife or plant areas and/or sites.

(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.

<p><b>§ 38.7075 SMA NATURAL RESOURCE REVIEW CRITERIA</b> <b>Continued</b></p>	<p>(R) The Mitigation Plan shall be prepared when: (1) The proposed development or use is within a buffer zone (wetland, pond, lakes, riparian areas, wildlife or plant areas and/or sites). (2) There is no practicable alternative as determined by MCC 38.7075 (Q).</p>	<p><b>Applies.</b> To access the proposed disposal site, ODOT will impact 0.15 acre of buffer. Appendix E contains a mitigation report that discusses impacts to natural resources, their buffers and proposes mitigation for these impacts. This one lane road with a turn out is the minimum necessary for site access.</p>
	<p>(S) In all cases, Mitigation Plans are the responsibility of the applicant and shall be prepared by an appropriate professional (botanist/ecologist for plant sites, a wildlife/fish biologist for wildlife/fish sites and a qualified professional for water resource sites).</p>	<p><b>Applies.</b> The mitigation report was prepared by a group of qualified biologist, professional wetland scientist and a landscape architect.</p>
	<p>(T) The primary purpose of this information is to provide a basis for the project applicant to re-design the proposed use in a manner that protects sensitive water resources, and wild-life/plant areas and sites, that maximizes his/her development options, and that mitigates, through restoration, enhancement, and replacement measures, impacts to the water resources and/or wildlife/plant area or site and/or buffer zones.</p>	<p><b>Applies.</b> The proposed project minimized impacts to 1,000 linear feet of man-made quarry wall/cliff and 0.15 acre of NSA buffer.</p> <p>As mitigation for these impacts ODOT will:</p> <ul style="list-style-type: none"> <li>• Restore Coopey Quarry creating 7.26 acres of buffer .</li> <li>• Restore the original 0.15 acre of buffer impact.</li> <li>• Utilize large wood cut from the site as downed logs</li> <li>• Remove English Ivy and Himalayan blackberry from 2.60 acre of existing NSA buffer. See Appendix E Coopey quarry Mitigation Report.</li> </ul>
	<p>(U) The applicant shall submit the mitigation plan to the local government. The local government shall submit a copy of the mitigation plan to the U.S. Forest Service, and appropriate state agencies. If the final decision contradicts the comments submitted by the state and federal wildlife agency/heritage program, the local government shall justify how it reached an opposing conclusion.</p>	<p><b>Applies.</b> The mitigation report is attached to this application for distribution to the appropriate agencies.</p>

**§ 38.7075 SMA NATURAL RESOURCE  
REVIEW CRITERIA  
Continued**

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

**Does not apply.** No wetlands will be created.

**§ 38.7075 SMA NATURAL RESOURCE  
REVIEW CRITERIA  
Continued**

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

(1) Describe the biology and/or function of the sensitive resources (e.g. Wildlife/plant species, or wetland) that will be affected by a proposed use. An ecological assessment of the sensitive resource to be altered or destroyed and the condition of the resource that will result after restoration will be required. Reference published protection and management guidelines.

(2) Describe the physical characteristics of the subject parcel, past, present, and future uses, and the past, present, and future potential impacts to the sensitive resources. Include the size, scope, configuration, or density of new uses being proposed within the buffer zone.

(3) Explain the techniques (W) Mitigation plans shall include maps, photographs, and text. The text shall:

(1) Describe the biology and/or function of the sensitive resources (e.g. Wildlife/plant species, or wetland) that will be affected by a proposed use. An ecological assessment of the sensitive resource to be altered or destroyed and the condition of the resource that will result after restoration will be required. Reference published protection and management guidelines.

(2) Describe the physical characteristics of the subject parcel, past, present, and future uses, and the past, present, and future potential impacts to the sensitive resources. Include the size, scope, configuration, or density of new uses being proposed within the buffer zone.

(3) Explain the techniques that will be used to protect the sensitive resources and their surrounding habitat that will not be altered or destroyed (for examples, delineation of core habitat of the sensitive wildlife/plant species and key components that are essential to maintain the long-term use and integrity of the wildlife/plant area or site)

**Applies.** Appendix E includes the Coopey Quarry Mitigation Report. The report includes the information requested.

<p><b>§ 38.7075 SMA NATURAL RESOURCE REVIEW CRITERIA</b> <b>Continued</b></p>	<p>(X) At a minimum, a project applicant shall provide to the local government a progress re-port 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.</p>	<p><b>Applies.</b> ODOT will quantitatively monitor the restoration site on years 1, 3 and 5 after completion of the disposal site. If all the performance standards are achieved in less, ODOT may terminate monitoring with approval of the review agencies after year 3. Qualitative assessments of the will occur on years 2 and 4.</p>
	<p>(Y) A final monitoring report shall be submitted to the local government for review upon completion of the restoration, enhancement, or replacement activity. This monitoring report shall document successes, problems encountered, resource recovery, status of any sensitive wildlife/plant species and shall demonstrate the success of restoration and/or enhancement actions. The local government shall submit copies of the monitoring report to the U.S. Forest Service; who shall offer technical assistance to the local government in helping to evaluate the completion of the mitigation plan. In instances where restoration and enhancement efforts have failed, the monitoring process shall be extended until the applicant satisfies the restoration and enhancement guidelines.</p>	<p><b>Applies.</b> ODOT plans to submit a final monitoring report upon completion of the restoration.</p>



**§ 38.7075 SMA NATURAL RESOURCE  
REVIEW CRITERIA  
Continued**

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

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

(2) All natural vegetation within the buffer zone shall be retained to the greatest extent practicable. Appropriate protection and maintenance techniques shall be applied, such as fencing, conservation buffers, live-stock management, and noxious weed control. Within five years, at least 75 percent of the replacement vegetation must survive. All plantings must be with native plant species that replicate the original vegetation community.

(3) Habitat that will be affected by either temporary or permanent uses shall be rehabilitated to a natural condition. Habitat shall be replicated in composition, structure, and function, including tree, shrub and herbaceous species, snags, pool-riffle ratios, sub-strata, and structures, such as large woody debris and boulders.

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

(5) Sensitive plants that will be destroyed shall be transplanted or replaced, to the maximum extent practicable. Replacement is used here to mean the establishment of a particular plant species in areas of suitable habitat not affected by new uses.

Replacement may be accomplished by seeds

**Applies.** (1) The Coopey Quarry Disposal Site Restoration will start with planting berms along I-84. These initial berms are designed to hide disposal activity from I-84 travelers. The berms will be planted on the north slopes with native tree species shortly after construction. Other initial restoration activities will include removal of English Ivy and Himalayan blackberry from the retained buffers, restoration of the pond shoreline, and placement of some downed logs in the existing buffer.

ODOT will restore the quarry site continuously as it gets filled. ODOT proposes to fill the quarry from the east to the west in phases. We are anticipating about five phases that create cells within the disposal site. When a cell is completely filled, it will be restored with a foot of topsoil, compost and native forest plantings within one year. When the final phase is complete and the cell is filled, ODOT will remove the access road and replant the access route. ODOT estimates this could take from 5-30 years.

(2) The proposal will enhance and retain 2.6 acres of buffer while only impacted 0.15 acre. In addition ODOT will create 7.26 acres of buffer planted with native species.

(3) The 0.15 acre of buffer impact will be restored once the disposal site is completed.

(4) The proposed mitigation report demonstrates an ecological lift from the proposed mitigation plan (Appendix E)

(5) No sensitive plants will be destroyed.

(6) The one lane road with a turn out is the minimum necessary for site access. The road does not cross a stream or wetland.

(7) The project is not impacting or creating wetlands.

<b>§ 38.7300- REVIEW AND CONDITIONAL USES</b>	(A) Agriculture	
	(1) The use is compatible with agricultural uses and would not force a change in or significantly increase the cost of accepted agricultural practices on nearby lands devoted to agricultural use; and	<b>Applies.</b> The operations at the quarry would not affect nearby agricultural uses.
	(2) The use will be sited to minimize the loss of land suitable for the production of crops or livestock.	<b>Applies.</b> Operations at the quarry do not affect land suitable for production of crops or livestock.
	(B) Forestry	<b>Applies.</b> The use is in a GSF40 zone.
	(1) The owners of land designated GGF or GGA within 500 feet of the perimeter of the subject parcel have been notified of the land use application and have been given at least 10 days to comment prior to a final decision;	<b>Does not apply.</b> The zone is GSF40, not a GGF or GGA zone, nor are there GGF or GGA parcels within 500 feet of the perimeter of the subject parcel.
	(2) The use will not interfere seriously with accepted forest or agricultural practices on nearby lands devoted to resource use;	<b>Applies.</b> The proposed use does not have an impact on nearby lands devoted to resource use. Parcels to the west of the proposed use are zoned residential, and parcels to the south are Open Space. The proposed use does not interfere with the GSF parcels to the east or southeast as proposed activities are shielded and separated from adjacent land uses by cliff walls, the Historic Columbia River Highway, or berms per the mitigation plan.
	(3) The use will be sited in such a way as to minimize the loss of forest or agricultural land and to minimize the chance of interference with accepted forest or agricultural practices on nearby lands; and	<b>Applies.</b> The site does not have any forest resources, nor is it agricultural land. The proposed use as a disposal site for highway maintenance materials generated by slide or other geo-environmental events will not interfere with practices on nearby lands as proposed activities are shielded and separated from adjacent land uses by cliff walls, the Historic Columbia River Highway, or berms per the mitigation plan.
	(4) The use will not significantly increase fire hazard, fire suppression costs or risks to fire suppression personnel and will comply with MCC 38.0085.	<b>Applies.</b> The use will not generate any increase in fire hazard, fire suppression costs or risks to fire suppression personnel. Highway spoil materials are not flammable, and the mitigation plan is consistent accepted best practices. This activity is not anticipated to increase fire hazard or fire suppression costs.

§ 38.7300- REVIEW AND CONDITIONAL USES Continued	(C) Residential	
	(1) The proposed use would be compatible with the surrounding area. Review of compatibility shall include impacts associated with the visual character of the area, traffic generation, effects of noise, dust and odors.	<b>Applies.</b> The proposed use is visually screened from adjacent residential land uses. Traffic increases are not anticipated to impact nearby residential sites, as the proposed use will only attract traffic related to roadway maintenance needs. ODOT will use best management practices to address noise and dust; odors are not anticipated with spoils storage sites.
	(2) The proposed use will not require public services other than those existing or approved for the area.	<b>Applies.</b> The proposed use does not require additional public services.
	(3) If the subject parcel is located within 500 feet of lands designated GGA or GGF, new buildings associated with the proposed use shall comply with MCC 38.0060.	<b>Does not apply.</b> No buildings are proposed in this action.
	(D) Commercial	
	(1) The proposal is limited to 5,000 square feet of floor area per building or use; and	<b>Does not apply.</b> The proposed use is not commercial.
	(2) The proposed use would be compatible with the surrounding areas including review for impacts associated with the visual character of the area, traffic generation and the effects of noise, dust and odors	<b>Does not apply.</b> This proposal is not commercial.
	(E) Non-Recreation Uses in GG-PR	<b>Does not apply.</b> The proposed use is not in a designated GG-PR zone, nor is it adjacent to GG-PR.

<p><b>§ 38.7300- REVIEW AND CONDITIONAL USES</b> <b>Continued</b></p>	<p>(1) The proposed use will not interfere with existing or approved public recreation uses on the subject property or adjacent lands. Mitigation measures to comply with this criterion may include onsite buffers, seasonal or temporary closures during peak recreation use periods, etc.</p>	<p><b>Does not apply.</b> The proposed use is not in a designated GG-PR zone, nor is it adjacent to GG-PR.</p>
	<p>(2) The proposed use will not permanently commit the majority of the site to a nonrecreational use. Careful siting and design of structure and other improvements may be utilized to comply with this criterion.</p>	<p><b>Does not apply.</b> The proposed use is not in a designated GG-PR zone, nor is it adjacent to GG-PR.</p>
	<p>(3) Land divisions may be allowed upon a demonstration that the proposed land division is necessary to facilitate, enhance or otherwise improve recreational uses on the site.</p>	<p><b>Does not apply.</b> The proposed use is not in a designated GG-PR zone, nor is it adjacent to GG-PR.</p>
	<p>(F) Non-Recreation Uses in GG-CR</p>	<p><b>Does not apply.</b> The proposed use is not in a designated GG-CR zone, nor is it adjacent to GG-CR.</p>
	<p>(1) The proposed use will not interfere with existing or approved commercial recreation uses on the subject property or adjacent lands. Mitigation measures to comply with this criterion may include onsite buffers, seasonal or temporary closures during peak recreation use periods, etc</p>	<p><b>Does not apply.</b> The proposed use is not in a designated GG-CR zone, nor is it adjacent to GG-CR.</p>
	<p>(2) The proposed use will not permanently commit the majority of the site to a nonrecreational use. Careful siting and design of structure and other improvements may be utilized to comply with this criterion.</p>	<p><b>Does not apply.</b> The proposed use is not in a designated GG-CR zone.</p>

§ 38.7300- REVIEW AND CONDITIONAL USES Continued	(3) Land divisions may be allowed upon a demonstration that the proposed land division is necessary to facilitate, enhance or otherwise improve recreational uses on the site.	<b>Does not apply.</b> The proposed use is not in a designated GG-CR zone.
<b>PART 7 - SPECIAL USES</b>		
§ 38.7350 DISPOSAL SITES FOR SPOIL MATERIALS FROM PUBLIC ROAD MAINTENANCE ACTIVITIES	(A) Application Requirements. In addition to other applicable requirements, land use applications for disposal sites shall include the same information that applicants are required to submit for expansion of existing quarries and production and/or development of mineral resources in the GMA, including, but not limited to:	<b>Applies.</b> All documentation in this permit is consistent with the information required for an expansion of existing quarries.

**§ 38.7350 DISPOSAL SITES FOR SPOIL MATERIALS FROM PUBLIC ROAD MAINTENANCE ACTIVITIES**  
**Continued**

	<p>(1) A reclamation plan that includes:</p> <p>(a) A map of the site, at a scale of 1 inch equals 200 feet (1:2,400) or a scale providing greater detail, with 10-foot contour intervals or less, showing pre-reclamation existing grades and post-reclamation final grades; locations of topsoil stockpiles for eventual reclamation use; location of catch basins or similar drainage and erosion control features employed for the duration of the use; and the location of storage, processing, and equipment areas employed for the duration of the use.</p> <p>(b) Cross-sectional drawings of the site showing pre-reclamation and post-reclamation grades.</p> <p>(c) Descriptions of the proposed use, in terms of estimated quantity and type of material removed, estimated duration of the use, processing activities, etc.</p> <p>(d) Description of drainage/erosion control features to be employed for the duration of the use.</p> <p>(e) A landscaping plan providing for re-vegetation consistent with the vegetation patterns of the subject landscape setting, indicating species, number, size, and location of plantings for the final reclaimed grade, as well as a description of irrigation provisions or other measures necessary to ensure the survival of plantings.</p>	<p><b>Applies.</b> Appendix B includes a reclamation plan that addresses all the information required in (a) through (e).</p> <ul style="list-style-type: none"> <li>a. Map is included</li> <li>b. Cross section drawings showing pre-reclamation and post-reclamation grades</li> <li>c. Description of the proposed and estimated quantity and type of material removed, estimate duration of the use, process activities, etc.</li> <li>d. Description of drainage/erosion control features to be employed for the duration of the use.</li> <li>e. A landscaping plan providing for re-vegetation consistent with the vegetation patterns of the subject landscape setting, indicating species, number, size, and location of plantings for the final reclaimed grade, as well as a description of irrigation provisions or other measures necessary to ensure the survival of plantings.</li> </ul>
	<p>(2) Perspective drawings of the site as seen from key viewing areas.</p>	<p><b>Applies.</b> Appendix F includes photos and perspective drawings of the site from key viewing areas as part of the Visual Analysis.</p>

<p><b>§ 38.7350 DISPOSAL SITES FOR SPOIL MATERIALS FROM PUBLIC ROAD MAINTENANCE ACTIVITIES</b> <b>Continued</b></p>	<p>(3) Cultural resource reconnaissance and historic surveys, as required by MCC 38.7045(A). Disposal sites shall be considered a “large-scale use” according to MCC 38.7045 (D)(2).</p>	<p><b>Applies.</b> The required cultural and historic resource surveys required are complete and SHPO has provided the concurrence letter to Multnomah County per an email sent by George Plummer 1/12/18.</p>
	<p>(4) Written reports of field surveys to identify sensitive wildlife areas or sites and sensitive plants. (a) Field survey reports identifying sensitive wildlife sites shall:</p> <ol style="list-style-type: none"> <li>1. Cover all areas affected by the proposed use or recreation facility;</li> <li>2. Be conducted by a professional wildlife biologist hired by the project applicant;</li> <li>3. Describe and show all sensitive wildlife areas and sites discovered in a project area on the site plan map.</li> </ol> <p>(b) Field survey reports identifying sensitive plant sites shall:</p> <ol style="list-style-type: none"> <li>1. Cover all areas affected by the proposed use or recreation facility;</li> <li>2. Be conducted by a person with recognized expertise in botany or plant ecology hired by the project applicant;</li> <li>3. Identify the precise location of the sensitive plants and delineate a 200-foot buffer zone;</li> <li>4. Show results on the site plan map.</li> </ol>	<p><b>Applies.</b> Appendix C includes the results of the biological field surveys. The surveys were conducted in compliance with all provisions of (a) and (b). Both the wildlife and plant surveys were conducted by ODOT qualified staff. All wildlife and plant resources have been identified and mapped according to the listed provisions and are attached in Appendix C.</p>

**§ 38.7350 DISPOSAL SITES FOR SPOIL MATERIALS FROM PUBLIC ROAD MAINTENANCE ACTIVITIES**  
**Continued**

(B) Siting Standard. The proposed disposal site shall only be approved if the applicant demonstrates it is not practicable to locate the disposal site outside the Scenic Area or inside an Urban Area. At a minimum, the applicant shall submit a feasibility and suitability analysis that compares the proposed disposal site to existing or potential disposal sites located both outside the Scenic Area and inside an Urban Area.

**Applies.** Appendix H, the Feasibility and Suitability Analysis Coopey Disposal Site includes analysis that demonstrates it is not practicable to locate the disposal site outside of the Scenic Area or inside an urban area. Appendix H details how ODOT maintenance staff identified the need for a new disposal site in the Columbia River Gorge. Existing disposal sites are at capacity and permitted for temporary storage. ODOT needs a long term solution to store debris within the Columbia River Gorge due to the cost and time associated with removing materials outside of the Gorge area. ODOT surveyed existing ODOT owned lands that could provide opportunities to store materials (spreadsheet attached Appendix H). The existing 8 ODOT managed disposal sites within the Columbia River Gorge National Scenic Area are at capacity. Sites outside the scenic area would require extensive travel time. Multnomah County trucks road debris to a disposal site in the West Hills as there are no suitable sites nearby. ODOT is not able to truck debris a long distance and through the Portland Metro because of the life line function of ODOTs facilities (Historic Highway and I-84). Geologic events most often occur during winter, and facility closures require long detours which may also be impacted by slides and rock fall during severe weather conditions. During winter operations maintenance crews have limited access to dump truck as other trucks in the fleet are fitted with plows and sanding equipment necessary to maintain access through the Gorge. During these times maintenance staffing is limited and often spread across the region plowing or sanding to maintain access on the interstate or along the Historic Highway. Having a nearby disposal site would reduce the length of closures and allow ODOT to more quickly reopen lifeline transportation facilities after slides or rockfall events.

(C) Scenic Resource Standards. Disposal sites shall comply with the same scenic resources protection standards as expansion of existing quarries and production and/or development of mineral resources in the GMA, including, but not limited to:



<p><b>§ 38.7350 DISPOSAL SITES FOR SPOIL MATERIALS FROM PUBLIC ROAD MAINTENANCE ACTIVITIES</b>  <b>Continued</b></p>	<p>(1) Sites more than 3 miles from the nearest key viewing area shall be visually subordinate as seen from any key viewing area, according to MCC 38.7035 (B) (25).  An interim period to achieve compliance with this requirement shall be established before approval. The period shall be based on site-specific topographic and visual conditions, but shall not exceed 3 years beyond the start of on-the-ground activities.</p>	<p><b>Applies.</b> Appendix F includes the site plan including the mitigation to ensure that the proposed activities are visually subordinate from all Key Viewing Areas.</p>
	<p>(2) Sites less than 3 miles from the nearest key viewing area shall be fully screened from any key viewing area, according to MCC 38.7035 (B) (26).  An interim period to achieve compliance with this requirement shall be established before approval. The period shall be based on site-specific topographic and visual conditions, but shall not exceed 1 year beyond the start of on-the-ground activities. Disposal activity occurring before achieving compliance with full screening requirements shall be limited to activities necessary to provide such screening (creation of berms, etc.).</p>	<p><b>Applies.</b> Appendix F includes the site plan including the mitigation to ensure that the proposed activities are visually subordinate from all Key Viewing Areas.</p>

**§ 38.7350 DISPOSAL SITES FOR SPOIL  
MATERIALS FROM PUBLIC ROAD  
MAINTENANCE ACTIVITIES**  
**Continued**

(3) Reclamation plans shall restore the site to a natural appearance that blends with and emulates surrounding landforms and vegetation patterns to the maximum extent practicable.  
(Ord. 1064, Add, 06/23/2005)

**Applies.** Appendix B includes the reclamation to restore the site to natural appearance.

New appendix  
E  
replaces

**Coopey Quarry  
ODOT M17016  
Mitigation Report**

RECEIVED  
APR 18 2018

By: .....

**Multnomah County, Oregon**



*Prepared by:*

**Oregon Department of Transportation (ODOT)**  
Region 1  
123 NW Flanders  
Portland, OR 97209-4012  
503-731-8427

**November 8, 2017  
Revised March 2018**

**EXHIBIT**

tabbies

A.7

## Table of Contents

1. Introduction .....	1
2. Priority Habitats .....	3
3. Buffers .....	3
4. Impacts .....	5
5. Mitigation .....	5
6. Performance Standards and Monitoring .....	7

### Tables and Figures

Table 1. Proposed Vegetation

Figure 1. Vicinity

Figure 2. Coopey Quarry Topographic Map circa 1935

Figure 3. Buffers and Impacts

Figure 4. Coopey Quarry restoration concept

### Appendices

Appendix A: Coopey Quarry Reclamation Plan

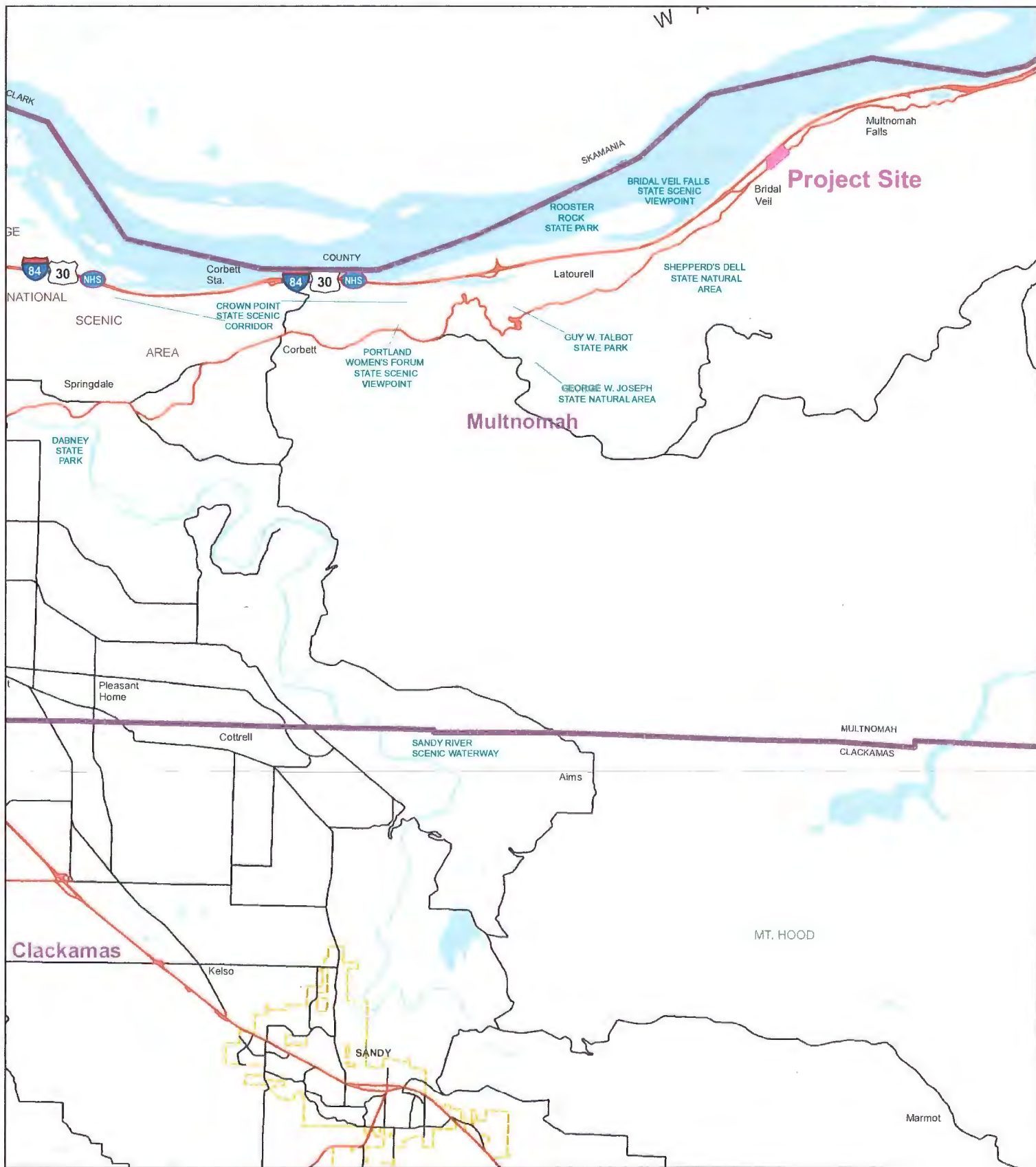
## 1. Introduction

ODOT is considering Coopey Quarry as a disposal site for landslide debris (**Figure 1, next page**). The winter of 2016-2017 saw heavy rains in the Columbia River Gorge National Scenic Area (CRGNSA). The rain combined with the steep topography and frequent freezing and thawing resulted in a series of landslides. These landslides have filled ODOT's current permanent and temporary disposal sites. In addition, the Eagle Creek fire of this past summer has created more slides and debris. Barren slopes have increased the potential for more slides this coming winter. Coopey Quarry represents ODOT's best option for a permanent disposal site in the Gorge. It could take five to thirty years to fill the quarry. This will depend on how much slide debris is produced in the Gorge which fluctuates considerably from year to year. To access the old quarry site, a new roadway is proposed through existing buffer around priority habitats. This mitigation report documents impacts to the priority habitats and buffers and proposes mitigation for these impacts in compliance with Multnomah County's CRGNSA Ordinance, Chapter 38.

Coopey Quarry was chosen as a potential disposal site in part because of its disturbed nature. Historic site alterations include construction of the Historic Columbia River Highway (HCRH) to the south and the railroad and I-84 to the north. A topographic map from 1935 shows the likely pre-quarry topography (**Figure 2**). Since then, the site was excavated significantly creating a steep cliff face and flat quarry floor. The quarry is identified on ROW maps from late 1930s. The site was used on and off into the 1960s or 1970s. Today the floor of the quarry is rock or gravel with some interstitial soils; where soils are no deeper than 4 inches. Grasses, weeds, moss and lichen cover most of the quarry floor. Within the quarry floor, woody vegetation grows in spots particularly near the shaded southern edge of the floor where there tends to be more soil sluffed from above (**Photo 1**). Red alder (*Alnus rubra*), Himalayan blackberry (*Rubus armeniacus*), California brome (*Bromus carinatus*) are the common dominants with patches of chickory (*Cichorium intybus*), common camas (*Camassia quamash*) and black cottonwood (*Populus balsamifera*) saplings. The top of the cliff wall is rimmed with forest on native soils. This forest is dominated by Oregon oak (*Quercus garryana*), Douglas fir (*Pseudotsuga menziesii*), and black cottonwood (*Populus balsamifera*) with some big leaf maple (*Acer macrophyllum*). The understory is patchy made up of predominantly poison oak (*Toxicodendron diversilobum*), English ivy (*Hedera helix*) and snowberry (*Symphoricarpos albus*) with blackberry (*Rubus armeniacus*), herb Robert (*Geranium robertianum*), red osier dogwood (*Cornus stolonifera*) and multiple species of fern being common.

**Photo 1.** Photo of Coopey Quarry from center of site looking southeast.





OREGON DEPARTMENT OF TRANSPORTATION

Coopey Quarry

**Figure 1**

Overview

0 4,350 8,700 17,400 Feet



**Legend**

 County

 Coopey Quarry





Figure 2. 1935 Topographic sketch of Coopey Quarry.

## 2. Priority Habitats

Several Priority Habitats, as defined by Multnomah County Code (MCC Chapter 38) are located on the project site (Figure 3). A large pond is located in the northeast corner of the property and may have been dug in what once was part of the Columbia River floodplain. The shores of the pond are gravel with large boulders indicating that the pond was excavated. Three seasonal wetlands are located along the southern property line, adjacent to the HCRH (See Wetland Delineation Report). Coopey Creek is located off site to the west and appears to be perennial.

The quarry wall, although man-made, provides cliff habitat. The cliffs are approximately 1,000 linear feet long and 20-50 feet tall, of which approximately 500 feet is vegetated by several species of fern, English ivy and blackberry and transitions into a vegetated steep slope. The remaining 500 feet are relatively un-vegetated and contain a fissure running horizontally approximately 15 feet from the top. There are no sensitive plant or wildlife sites on the property (See Biological Resource Impact Memo).

## 3. Buffers

The pond, wetlands, Coopey Creek and the quarry wall (cliff) were all considered to require a 200 foot NSA buffer. The old quarry provides few if any buffer functions. This area is mostly gravel and after fifty years has had some regrowth of vegetation in some areas that may provide "de minimis" buffer functions. Without intervention to restore the site establishment of soils, forest growth and a functioning buffer are centuries away. Excluding the wetlands, pond, and Quarry, the remaining area is mostly buffer (Appendix A, Figure 2). The buffers for different resources overlapped and merged with other buffers. Buffers were not separated by resource.



OREGON DEPARTMENT OF TRANSPORTATION

Coopey Quarry

**Figure 3**

Buffers and Impacts

0 80 160 320 Feet



## Legend

- |                                                                                                 |                                                                                                                 |
|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|
|  Wetland     |  Quality Combined Buffer   |
|  Stream      |  Disturbed Combined Buffer |
|  Quarry Wall |  Proposed Road             |



## 4. Impacts

No impacts are proposed to wetlands or the pond.

The man-made quarry wall / cliff face will be lost when the disposal site is filled. The quarry wall is about 20-50 feet high and extends 1,000 feet along the southern edge of the project. The wall is not currently used by nesting birds and does not support sensitive cliff dwelling plant species. However, there is potential for this quarry wall to support nesting birds and support cliff dwelling sensitive plant species in the future.

ODOT's largest impacts to buffers are within the old quarry area, which will be filled for restoration. In this area, 7.24 acres will be impacted. This area is poor quality buffer having little soils and this within a mostly rock matrix. The vegetation is sparse, stunted and often non-native.

Additional roadway buffer impacts were determined by calculating the area of the access road passing through the existing buffer. This includes a ten foot lane plus two feet on each side for additional impacts from fill slopes and grading. The access road will impact 0.15 acre of buffer. This impact is not permanent and ODOT will restore the roadway once the disposal site is filled, which is estimated to take between 5-30 years.

The roadway buffer is second growth forest consisting of Oregon white oak (*Quercus garryana*), Douglas fir (*Pseudotsuga menziesii*), and black cottonwood and some big leaf maple (*Acer macrophyllum*) (**Photo 2**). The understory is patchy made up of predominantly poison oak (*Toxicodendron diversilobum*), English ivy (*Hedera helix*) and snowberry (*Symphoricarpos albus*) with blackberry (*Rubus armeniacus*) and herb Robert (*Geranium robertianum*).



Photo 2. Photo of buffer habitat.  
4/11/2017

## 5. Mitigation

The project will remove 7.26 acres of disturbed NSA buffer, 1,000 linear feet of man-made quarry wall/cliff and 0.15 acre of good quality NSA buffer.

As mitigation for these impacts ODOT will

- Restore Coopey Quarry creating 7.26 acres of buffer
- Restore the original 0.15 acre of buffer impact.
- Remove English Ivy and Himalayan blackberry from 2.60 acre of existing NSA buffer

## Approach

The overall goal is to restore a forested hillslope on the current quarry site. Key design elements include

- 1) Retaining pond and wetlands
- 2) Using vegetated berms to hide disposal activity from I-84 travelers
- 3) Creating topography similar to what the site was like in 1935
- 4) Creating ephemeral ponds to increase plant community and habitat diversity

The Coopey Creek Disposal Site Reclamation Plan (**Appendix A**) will start with planting berms along I-84. These initial berms are designed to hide disposal activity from I-84 travelers. The berms will be planted on the north slopes with native tree species shortly after construction. Other initial restoration activities will include removal of English Ivy and Himalayan blackberry from the retained buffers.

The existing pond shoreline is ringed with smaller red alder, willow, Douglas fir and black cottonwood trees with an understory of Himalayan blackberry (Photo 3). The rocky very shallow soils limit plant growth. ODOT proposes to remove the Himalayan blackberry and retain the larger trees.

ODOT will restore the quarry site continuously as it gets filled. ODOT proposes to fill the quarry from the east to the west in phases (Figure 4). We are anticipating about five phases that create cells within the disposal site. The berms along I-84 will be increased as the cells are filled. When a cell is completely filled, it will be restored with a foot of topsoil, compost and native forest plantings. When the final phase is complete and the cell is filled, ODOT will remove the access road and replant the access route.

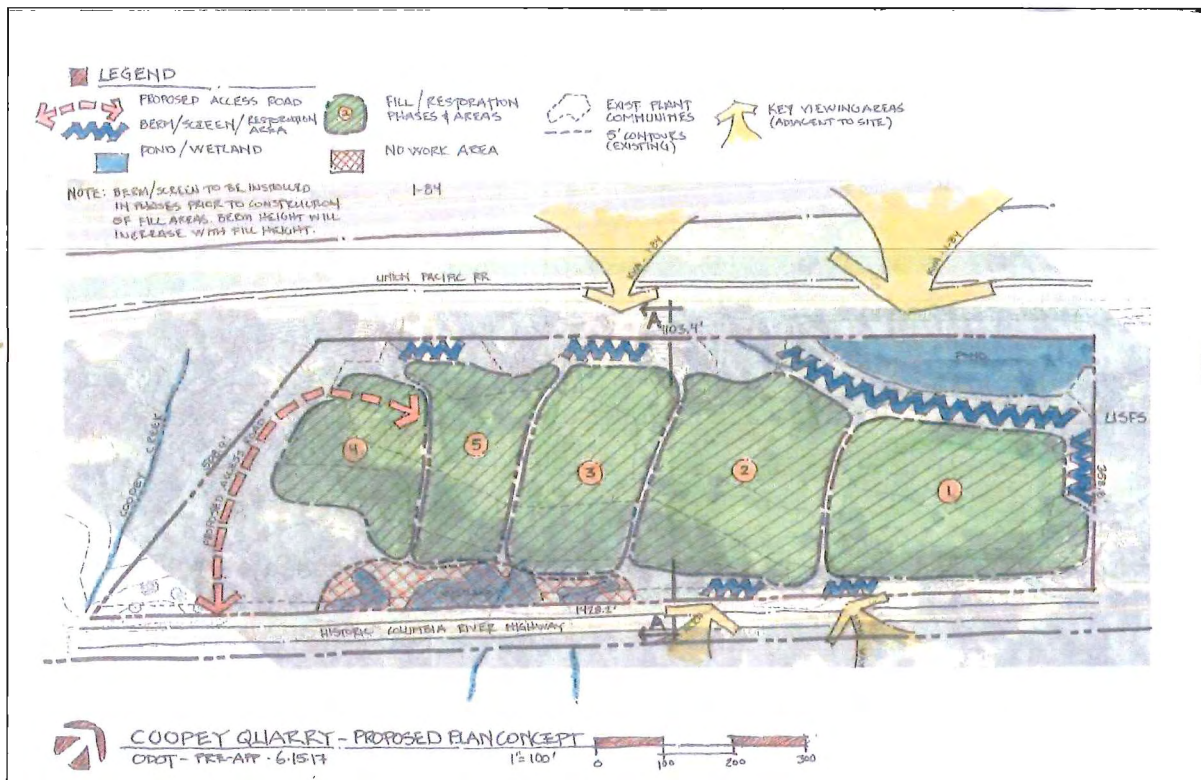


Figure 4. Coopey Quarry restoration concept.



Photo 3. Pond edge. 3/30/2017

ODOT will create some shallow depressions on top the restoration site. These depressions will have hard compacted subspoil with only a shallow soil layer (<6") on the surface to favor herbaceous growth. These shallow depressions will be fed by rainfall and runoff. At least one will receive runoff from the existing wetlands. These ponds will hold water seasonally increase the hydraulic diversity of the site and increase plant diversity. These depressions will be seeded with a variety of native grasses and herbs including common camas (*Camassia quamash*) and Lupine (*Lupinus latifolius*). See Reclamation Plan for more details.

The Reclamation Plan (Appendix A) identifies the initial palette of woody plant species selected for the site. The landscape to the south and upslope of the HCRH near the site was the reference landscape that was used to help direct plant selection. The Reclamation Plan shows the proposed grades and includes a landscaping plan identifying the final plant species selected and shows the general planting locations. ODOT will plant the native overstory with Oregon White Oak and Douglas fir. Western red cedar and black cottonwood will increase the diversity of the overstory. High habitat quality shrub species (hazelnut, thimbleberry, snowberry, Oregon grape, oso berry, and serviceberry) were chosen to provide good wildlife food sources. Vine maple and oceanspray were selected to provide habitat for small passerine birds.

Downed large wood along the pond edge and within the buffer could be placed to provide wildlife habitat. It was not included because there was concern the wood could be considered a fire hazard. Further discussion of wood use on the site is warranted before a final decision.

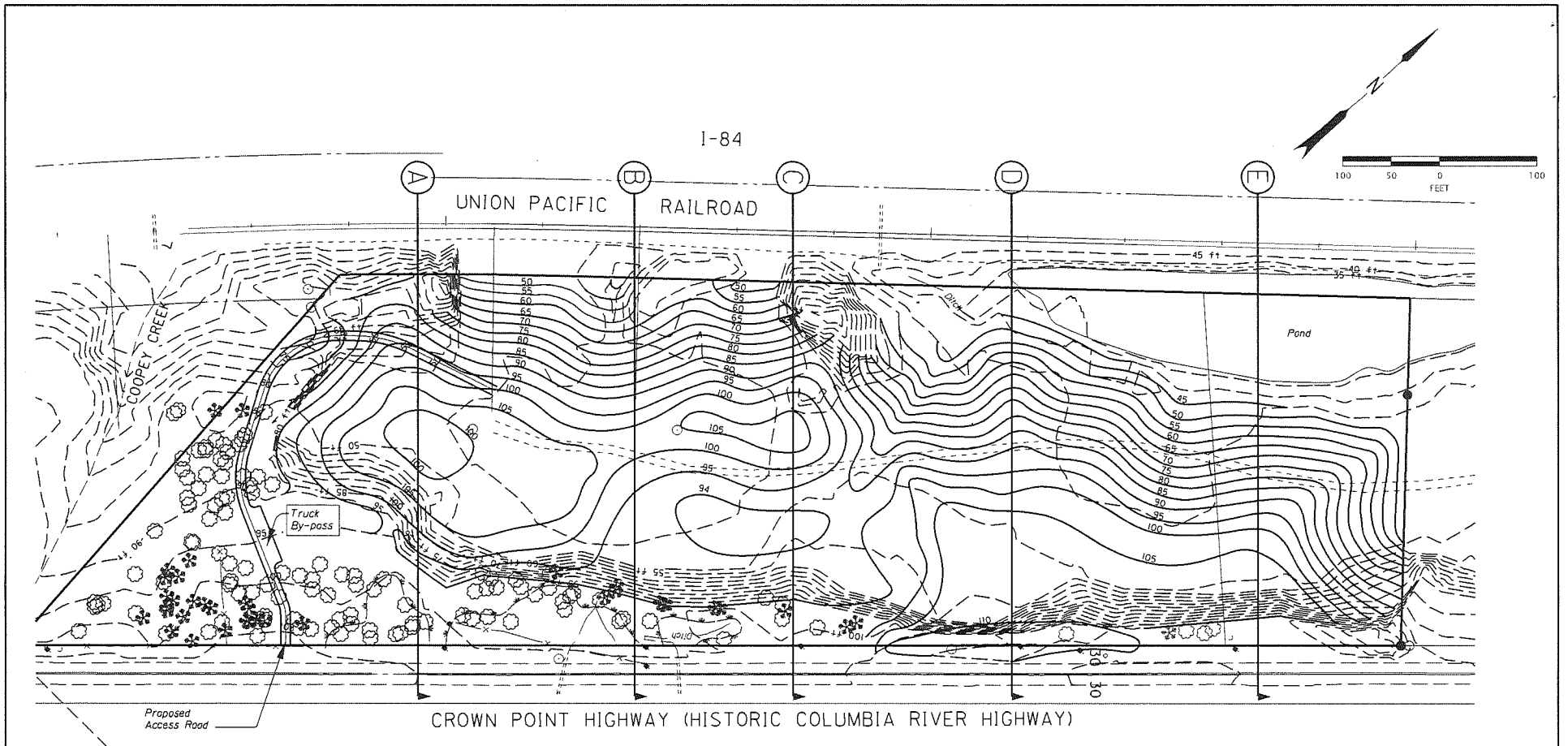
## 6. Performance Standards and Monitoring

The performance standards described below provide benchmarks for measuring achievement of the goals and objectives of the mitigation site on year five.

1. Cover. Percent Cover of native species shall exceed 70 percent.
2. Diversity. Five or more species will be present in native plant cover and contribute to at least 5 percent of total cover.
3. Noxious weed cover. Noxious weed cover (see Oregon Noxious Weed Lists A and B) will be reduced below 10%.
4. Planting Density. Initial plantings within the restoration site shall total 200 native woody stems per acre.

ODOT will quantitatively monitor the restoration site on years 1, 3 and 5 after completion of the disposal site. If all the performance standards are achieved in less, ODOT may terminate monitoring with approval of the review agencies after year 3. Qualitative assessments of the will occur on years 2 and 4. Restoration site maintenance may be necessary and could occur each year.

## **Appendix A: Coopey Quarry Reclamation Plan**



#### GENERAL PROJECT NOTES:

1. Existing and proposed contours are shown at 5-foot intervals.
2. Topsoil will be stored at the west end when encountered during slide excavation. Topsoil may be brought in as a sourced material when needed.
3. Erosion control will be ongoing. A 2" compost erosion blanket will be placed on top of the topsoil prior to planting. Shredded wood check dams, aggregate check dams, perimeter aggregate berms and shredded wood will be the primary perimeter control.
4. Estimated proposed fill is 430,000 Cubic Yards and will be a variety of materials from slides and debris flows within the Columbia River Gorge Scenic Area.
5. See landscape plan for proposed vegetation.

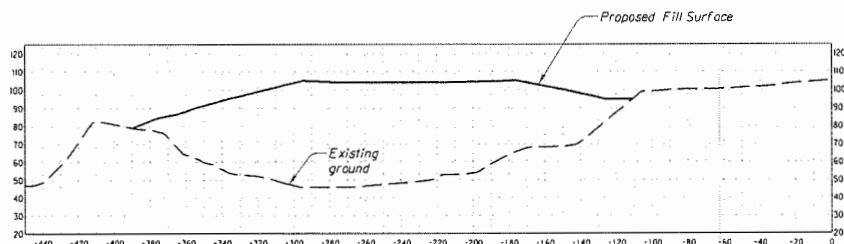
LEGEND	
	Existing Contours (5' intervals)
	Proposed Contours (5' intervals)
	Existing Deciduous Trees
	Existing Coniferous trees
	Wetlands
	Existing Quarry Rd.
	Proposed Quarry Access Rd.
	Section Lines (Sections Sht. 2)

## RECLAMATION PLAN

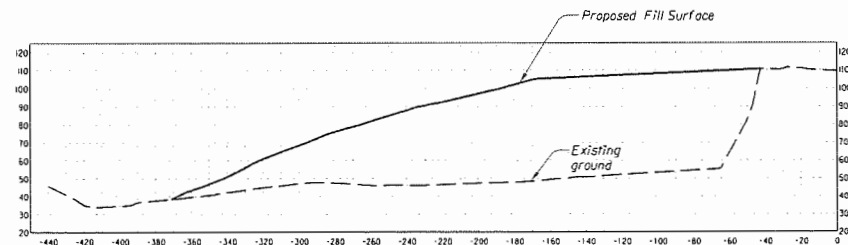
Coopey Quarry ODOT  
T 1 N R 5 E Section 14, TL 00600  
NSA Application

SHEET

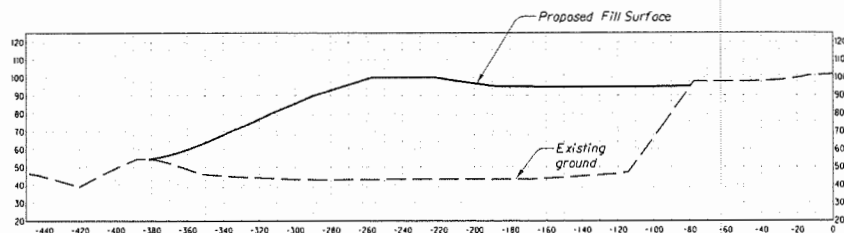
1 of 5



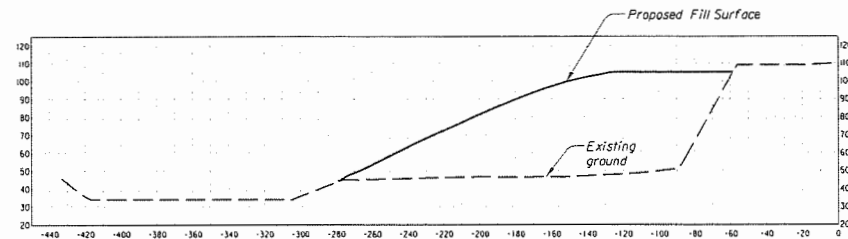
Cross Section A



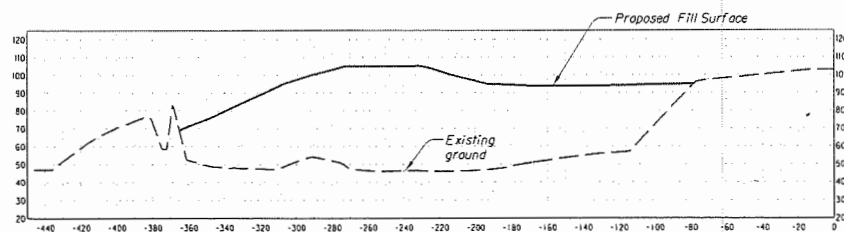
Cross Section D



Cross Section B



Cross Section E



Cross Section C

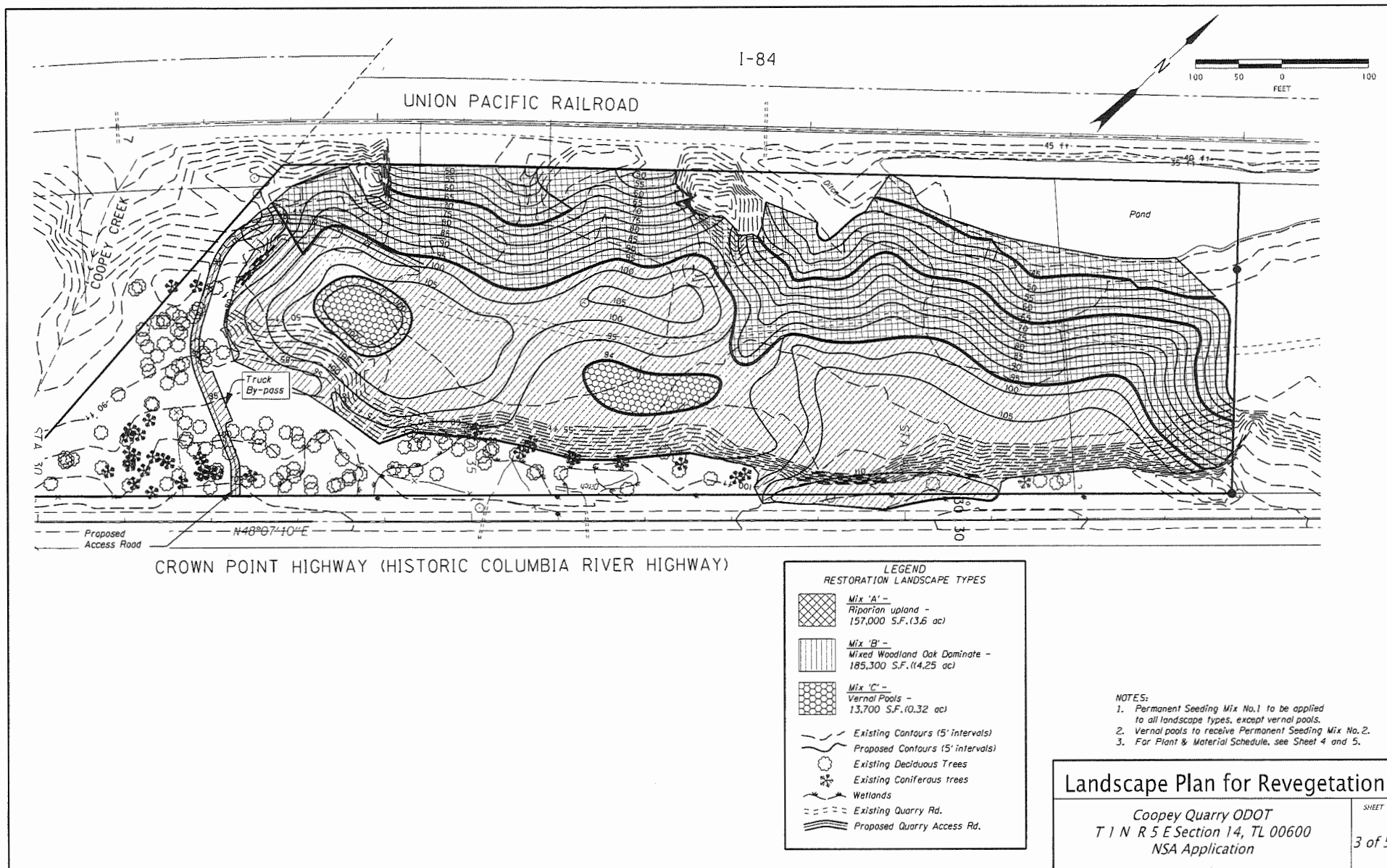
## CROSS SECTIONS

Coopey Quarry ODOT  
T I N R S E Section 14, TL 00600  
NSA Application

SHEET

2 of 5





PLANT and MATERIAL SCHEDULE - Coopey Quarry - Mixed Coniferous Woodland												
Plant Type	Botanical Name	Common Name	Size	Spacing	Root Type	Percent Mix	Plant Condition	A.S.N.S.	Layout	Notes	Irrigation	TOTAL
Mix 'A'	<i>Acer circinatum</i>	vine maple	D60L	12' O.C.	D60L Container	5%	Multi-branched		As Staked/Approved	Contract grown		70
	<i>Acer macrophyllum</i>	big leaf maple	D60L	12' O.C.	D60L Container	15%	Single trunk		As Staked/Approved	Contract grown		210
	<i>Alnus rubra</i>	red alder	D60L	12' O.C.	D60L Container	5%	Single trunk		As Staked/Approved	Contract grown		70
	<i>Amelanchier alnifolia</i>	serviceberry	D60L	12' O.C.	D60L Container	5%	Single trunk		As Staked/Approved	Contract grown		70
	<i>Fraxinus latifolia</i>	Oregon Ash	D60L	12' O.C.	D60L Container	5%	Single trunk		As Staked/Approved	Contract grown		70
	<i>Populus trichocarpa</i>	black cottonwood	D60L	12' O.C.	D60L Container	20%	Single trunk		As Staked/Approved	Contract grown		270
	<i>Quercus garryana</i>	Oregon white oak	D60L	12' O.C.	D60L Container	25%	Single trunk		As Staked/Approved	Contract grown		350
	<i>Pseudotsuga menziesii</i>	Douglas fir	D60L	12' O.C.	D60L Container	15%	Single trunk		As Staked/Approved	Contract grown		210
	<i>Thuja plicata</i>	western red cedar	D60L	12' O.C.	D60L Container	5%	Single trunk		As Staked/Approved	Contract grown		70
	Total Trees In Mix A											1,390
	<i>Cornus sericea</i>	red-osier dogwood	D40L	6' O.C.	D40L Container	5%			Groups 5-9	Contract grown		280
	<i>Corylus cornuta</i>	hazelnut	D40L	6' O.C.	D40L Container	10%			Groups 3-5	Contract grown		560
	<i>Halodiscus discolor</i>	ocean spray	D40L	6' O.C.	D40L Container	15%			Groups 3-5	Contract grown		840
	<i>Mahonia aquifolium</i>	Oregon Grape	D40L	5' O.C.	D40L Container	15%			Groups 4-7	Contract grown		840
	<i>Polystichum munitum</i>	sword fern	D40L	5' O.C.	D40L Container	5%			Groups 5-9	Contract grown		280
	<i>Oemleria cerasiformis</i>	osoberry	D40L	6' O.C.	D40L Container	10%			Groups 4-3	Contract grown		560
	<i>Ribes sanguineum</i>	red flowering current	D40L	6' O.C.	D40L Container	10%			Groups 4-3	Contract grown		560
	<i>Rosa gymnocarpa</i>	balduin rose	D40L	5' O.C.	D40L Container	5%			Groups 5-9	Contract grown		280
	<i>Rubus parviflorus</i>	rhimbleberry	D40L	5' O.C.	D40L Container	5%			Groups 5-9	Contract grown		280
	<i>Sambucus cerulea</i>	blue elderberry	D40L	6' O.C.	D40L Container	10%			Groups 5-7	Contract grown		560
	<i>Symphoricarpos albus</i>	snowberry	D40L	5' O.C.	D40L Container	10%			Groups 5-7	Contract grown		560
	Total Shrubs In Mix A											5,600
Mix 'B'	<i>Acer macrophyllum</i>	big leaf maple	D60L	12' O.C.	D60L Container	10%	Single trunk		As Staked/Approved			160
	<i>Amelanchier alnifolia</i>	serviceberry	D60L	12' O.C.	D60L Container	10%	Single trunk		As Staked/Approved			160
	<i>Cornus nuttallii</i>	dogwood	D60L	12' O.C.	D60L Container	5%	Single trunk		As Staked/Approved			80
	<i>Pseudotsuga menziesii</i>	Douglas fir	D60L	12' O.C.	D60L Container	20%	Single trunk		As Staked/Approved			330
	<i>Quercus garryana</i>	Oregon white oak	D60L	12' O.C.	D60L Container	50%	Single trunk		As Staked/Approved			820
	<i>Thuja plicata</i>	western red cedar	D60L	12' O.C.	D60L Container	5%	Single trunk		As Staked/Approved			80
	Total Trees In Mix B											1,630
	<i>Halodiscus discolor</i>	ocean spray	D40L	6' O.C.	D40L Container	20%			Groups 3-9	Contract grown		1,320
	<i>Polystichum munitum</i>	sword fern	D40L	5' O.C.	D40L Container	5%			Groups 5-9	Contract grown		330
	<i>Physocarpus opulifolius</i>	ninebark	D40L	6' O.C.	D40L Container	20%			Groups 5-9	Contract grown		1,320
	<i>Oemleria cerasiformis</i>	osoberry	D40L	6' O.C.	D40L Container	5%			Groups 4-3	Contract grown		330
	<i>Ribes sanguineum</i>	red flowering current	D40L	6' O.C.	D40L Container	20%			Groups 4-3	Contract grown		1,320
	<i>Rosa nutkana</i>	nodda rose	D40L	5' O.C.	D40L Container	15%			Groups 5-9	Contract grown		990
	<i>Sambucus cerulea</i>	blue elderberry	D40L	6' O.C.	D40L Container	5%			Groups 3-5	Contract grown		330
	<i>Symphoricarpos albus</i>	snowberry	D40L	5' O.C.	D40L Container	10%			Groups 5-9	Contract grown		660
	Total Shrubs In Mix B											6,600
Mix 'C'	<i>Cornus sericea</i>	red-osier dogwood	D40L	6' O.C.	D40L Container	30%			Groups 5-9			120
	<i>Rubus spectabilis</i>	salmonberry	D40L	6' O.C.	D40L Container	30%			Groups 5-9			120
	<i>Salix spp.</i>	salix spp.	D40L	6' O.C.	D40L Container	40%			Groups 7-12			120
	Total In Shrubs Mix C											360

## PLANT AND MATERIALS

Coopey Quarry ODOT  
T I N R 5 E Section 14, TL 00600  
NSA Application

SHEET

4 of 5



**PLANT and MATERIAL SCHEDULE - Coopey Quarry - Mixed Coniferous Woodland (Cont'd.)**

Plant Type	Botanical Name	Common Name	Size	Spacing	Root Type	Percent Mix	Plant Condition	A.S.N.S.	Layout	Notes	Irrigation	Sheet Number & Quantity	TOTAL
Permanent Seeding Mix No.1	<i>Achillea millefolium</i>	common yarrow	Seed				PLS/Acre	0.14			N/A		7.9
	<i>Anaphalis margaritacea</i>	pearly everlasting	Seed				PLS/Acre	0.08			N/A		
	<i>Asclepias speciosa</i>	showy milkweed	Seed				PLS/Acre	7.36			N/A		
	<i>Aster subspicatus</i>	aster spp.	Seed				PLS/Acre	0.91			N/A		
	<i>Bromus carinatus</i>	mountain brome	Seed				PLS/Acre	16.58			N/A		
	<i>Callinsia grandiflora</i>	giant blue-eyed Mary	Seed				PLS/Acre	1.33			N/A		
	<i>Deschampsia elonata</i>	slender hairgrass	Seed				PLS/Acre	0.87			N/A		
	<i>Elymus glaucus</i>	blue wildrye	Seed				PLS/Acre	4.37			N/A		
	<i>Festuca rubra</i>	red fescue	Seed				PLS/Acre	0.79			N/A		
	<i>Heuchera glabra</i>	piggyback plant	Seed				PLS/Acre	0.31			N/A		
	<i>Lupinus rivularis</i>	riverbank lupine	Seed				PLS/Acre	41.44			N/A		
	<i>Poa secunda var. secunda</i>	Sandberg's bluegrass	Seed				PLS/Acre	0.16			N/A		
	<i>Prunella vulgaris</i>	self-heal	Seed				PLS/Acre	1.30			N/A		
	<i>Rosa gymnocarpa</i>	baldwin rose	Seed				PLS/Acre	2.68			N/A		
	<i>Salidago canadensis</i>	goldenrod	Seed				PLS/Acre	0.10			N/A		
	<i>Symphoricarpos mollis</i>	creeping fescue	Seed				PLS/Acre	1.58			N/A	Acre	
Permanent Seeding Mix No.2	<i>Allium cernuum</i>	nodding onion	Seed				PLS/Acre	4.79			N/A		0.32
	<i>Agrostis exarata</i>	spike bentgrass	Seed				PLS/Acre	0.28			N/A		
	<i>Aster subspicatus</i>	Douglas aster	Seed				PLS/Acre	0.43			N/A		
	<i>Comassia leichlinii</i>	great Comas	Seed				PLS/Acre	9.90			N/A		
	<i>Carex stipata var. stipata</i>	sawbeaked sedge	Seed				PLS/Acre	1.22			N/A		
	<i>Callinsia grandiflora</i>	giant blue-eyed Mary	Seed				PLS/Acre	1.00			N/A		
	<i>Delphinium nuttallii</i>	Nuttall's larkspur	Seed				PLS/Acre	0.29			N/A		
	<i>Deschampsia elonata</i>	slender hairgrass	Seed				PLS/Acre	0.41			N/A		
	<i>Downingia elegans</i>	elegant calicoflower	Seed				PLS/Acre	0.14			N/A		
	<i>Lupinus rivularis</i>	riverbank lupine	Seed				PLS/Acre	19.50			N/A		
	<i>Elymus glaucus</i>	blue wildrye	Seed				PLS/Acre	6.56			N/A		
	<i>Plagiobothrys frisuretus</i>	fragrant popcorn flower	Seed				PLS/Acre	0.51			N/A		
	<i>Plectritis congesta</i>	sea blush	Seed				PLS/Acre	0.99			N/A		
	<i>Poa secunda var. secunda</i>	Sandberg's bluegrass	Seed				PLS/Acre	0.49			N/A		
	<i>Sanitroga oregana</i>	Oregon saxifrage	Seed				PLS/Acre	2.76			N/A		
	Total In Mix											Acre	0.32

**PLANT AND MATERIALS**

Coopey Quarry ODOT  
T I N R S E Section 14, TL 00600  
NSA Application

5 of 5

# HCRH, MP 16, Coopey Quarry

APR 18 2013

## Proposed ODOT disposal site

BY: \_\_\_\_\_



EXHIBIT

A.8

# Coopey Quarry looking west





# East end of Quarry floor



Quarry wall looking SW from East end  
of the site





# Property damage from unsanctioned use

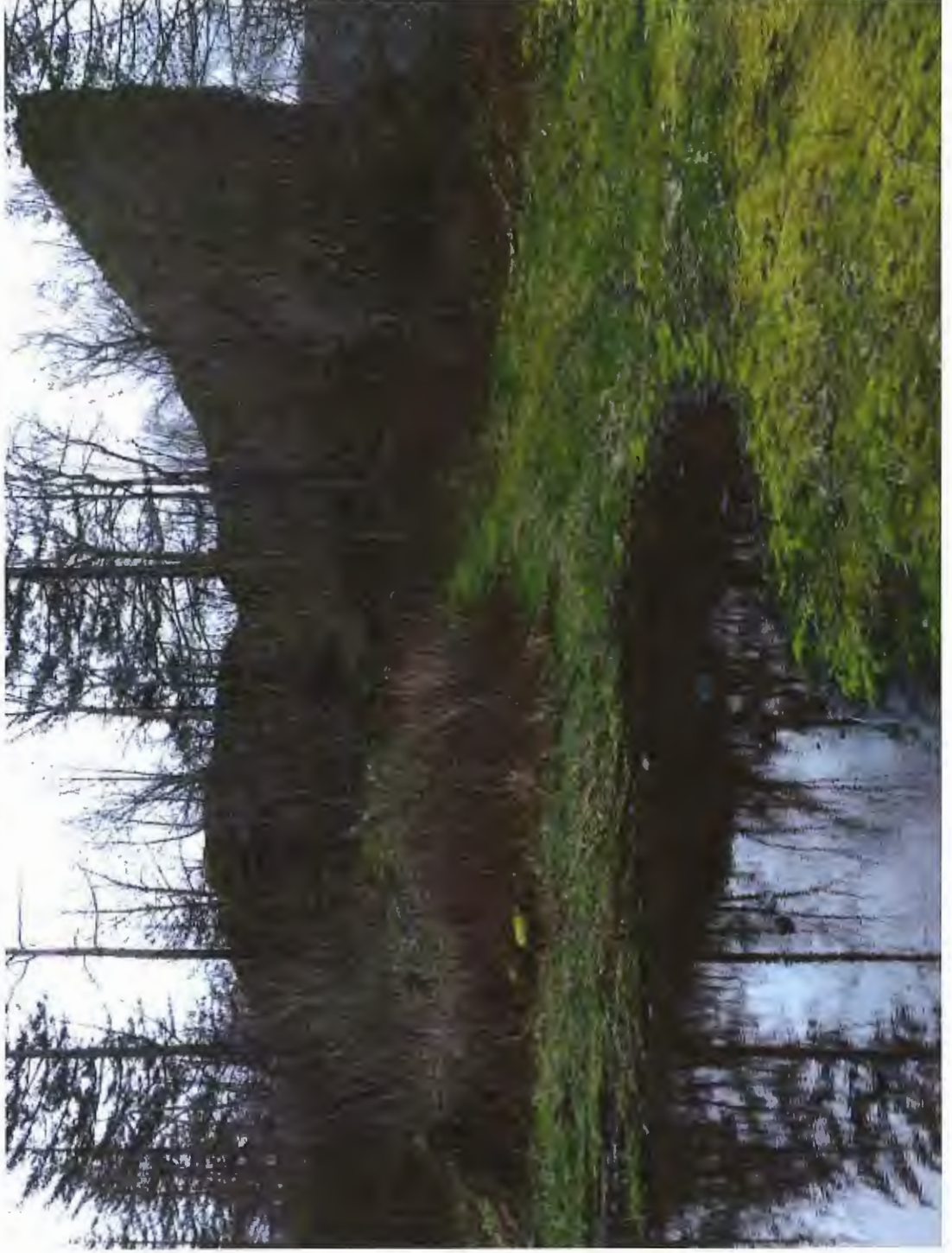


Looking NW toward railroad tracks  
and I-84





West end old quarry access road.  
Proposing to put in a new access road to  
the same location

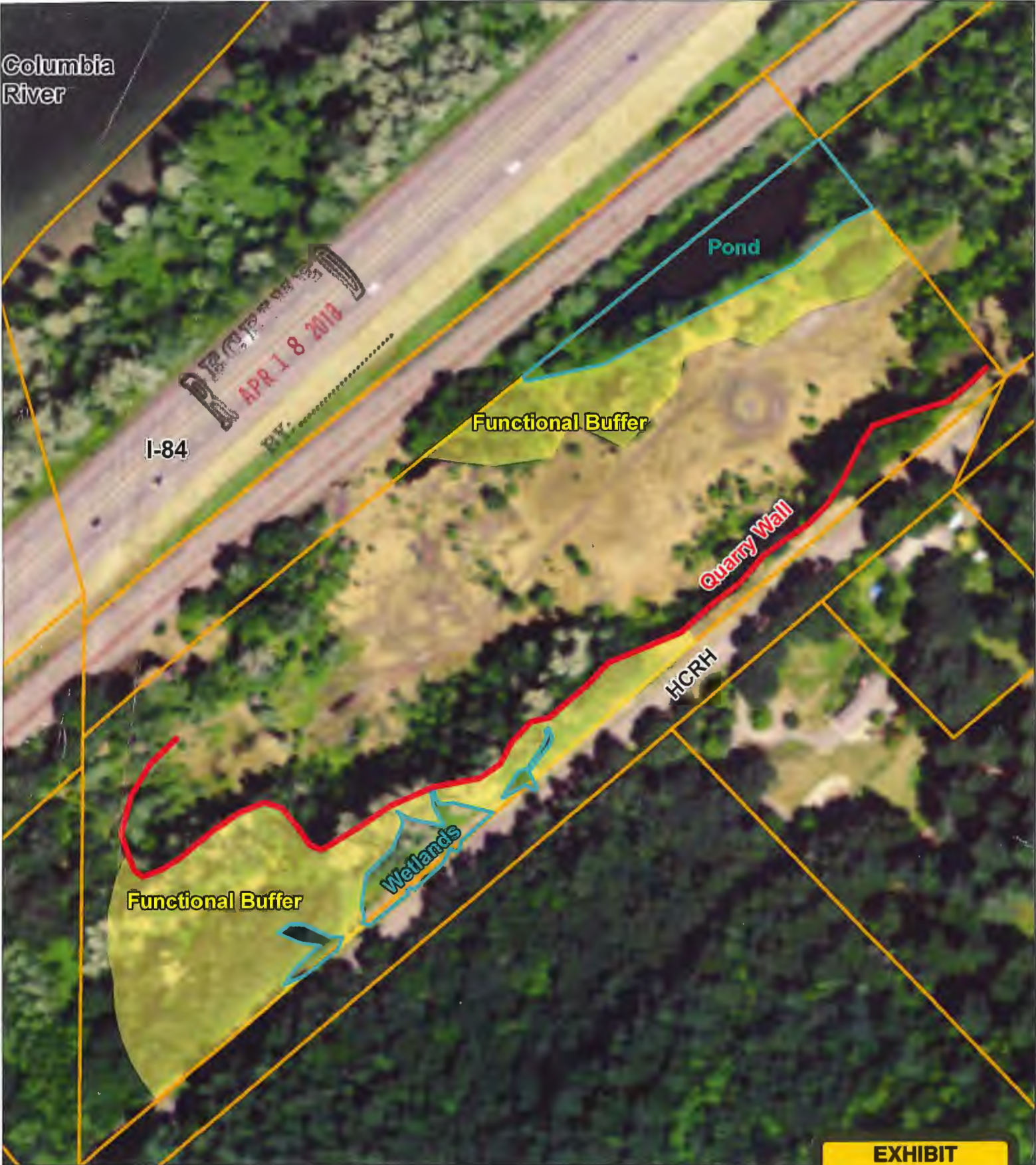




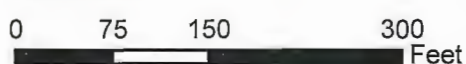
Old Quarry access road. Propose new road avoiding removal of large trees







OREGON DEPARTMENT OF TRANSPORTATION  
Coopey Quarry  
**Figure 1**  
Overview



**Legend**

- |                   |                   |
|-------------------|-------------------|
| Quarry Wall       | Functional Buffer |
| Regulated Wetland | Taxlots           |

tabbles®

**EXHIBIT**  
A.9

**RECEIVED**  
APR 18 2018

Coopey Quarry

BY: .....

<p><b>MCC 38.2035 (B) Review Uses – 1 year time frame for use</b></p>	<p>(A) The following used may be allowed on lands designated GSF pursuant to MCC 38.0530 (B) when the use or development will be sited to minimize the loss of land suitable for the production of forest products and upon findings the the NSA Site Review Standards of MCC <b>38.70000</b> and <b>38.7085</b> have been satisfied.</p>	<p>Time Frames don't work. We want use the quarry longer than 1 year</p>
	<p>38.2025 B(5) Resource enhance projects for the purpose of enhancing scenic, cultural, recreational, and or natural resources, subject to MCC 38.7345. These project may include new structures (e.g. fish ladders, sediment barriers) and or activities (e.g. closing and revegating unused roads, recontouring abandoned quarries).</p>	<p>Time Frames don't work. We want use the quarry longer than 1 year</p>
<p><b>38.2030 (B) Conditional Uses – Can be used long term</b> The following conditional uses may be allow on lands designated GSF, pursuant to the provisions of MCC <b>38.0045</b></p>	<p>(9) Disposal sites managed and operated by the Oregon Department of Transportation or Multnomah County Public Works Department for earth material and any intermixed vegetation by routine or emergency disaster public road maintenance activities within the Scenic Area to MC <b>38.7350</b></p>	<p>The Coopey Quarry will be used as a disposal site and will eventually be reclaimed to a more natural condition.</p>

**EXHIBIT**

A.10

tabbles

<b>38.0045</b> Review and Conditional Use Applications – Submittal Requirements	1- A list of KVAs 2- A map of the project 3- Vegetation 4- Vegetation to be removed 5- bodies of water 6- location of roads 7- location of structures 8- services 9- depth of grading and or ditching	
	(1) Proposed uses in streams, ponds, lakes and their buffer zones shall include exact boundary of the ordinary high water or normal pool elevation and the prescribed buffer zones; and description of actions that would alter or destroy the stream, pond, lake or riparian area.	No activities are proposed to destroy existing streams and wetlands.
<u>Ken &amp; Ben</u>	(2) Proposed uses in wetlands or wetland buffer zones shall include the exact boundary of the wetland and the wetlands buffer zone; and a description of actions that would alter or destroy the wetland.	No actions are proposed to destroy a wetland however activities will occur within the buffer. The proposed project has been designed to avoid all identified wetlands, streams, and buffer zones to the maximum extent practicable extent without compromising the purpose of the project, which is to provide a disposal site and ultimately restore the enhance the quarry floor. The design will avoid filling wetlands but there is no practicable alternative that would avoid all stream, stream buffer and wetland buffer impacts. In total, X acres of wetland buffer and X acres of stream buffer will be affected by the proposed project. This represents the minimum impacts necessary to complete the project without compromising public safety,



		<p>recreation, and scenic standards or the purpose of the proposed project. This finding was reached after multiple rounds of design revisions, during which the proposed impacts were reduced to the minimum impacts to the resources.</p> <p>Functional buffer area (Ken's map) There is no functional vegetated buffer on the quarry floor. The phased reclamation can create a buffer by planting vegetation.</p>
	(3) Proposed uses on parcel contiguous to established recreation sites shall provide a buffer between the proposed use and the recreation site sufficient to insure that the proposed use will not detract from the use or enjoyment of the recreation site.	There are no contiguous recreation sites. The property to the east is owned by the USFS. No plans for recreation are in place. The project will limit access by installing a berm between the quarry and the USFS property.
In the <b>GMA</b> all applications for structural development involving more than 100 CY of grading and slopes between 10% to 30% shall include a grading plan. In the Special Management Area all applications for structural development involving more than 100 CY of grading with slopes greater than 10% (except trails) shall include a grading plan. Grading plans shall include the following: Magnus	<p>a) A map 1" = 200' , contour interval minimum 5'</p> <p>b) Natural and finished grades</p> <p>c) Location of all areas to be graded with cut banks and fill slopes delineated.</p> <p>d) Estimated dimensions of graded areas.</p>	GMA – a grading plan is most likely needed.
	<p>A narrative description of the proposed grading activity.</p> <ul style="list-style-type: none"> <li>• Its purposes</li> <li>• An estimate of total volume to be moved.</li> <li>• The height of all cut banks and</li> </ul>	<p>Phased grading plan? Or Final?</p> <p>Phased reclamation plan or final?</p>

	<p>fill slopes</p> <ul style="list-style-type: none"> <li>• Provisions to be used for drainage stabilization of graded areas.</li> <li>• A description of all plant materials</li> <li>• A description of erosion control measures to be used.</li> </ul>	
<b>38.7350 Disposal Sites for Spoil and Material from Public Road Maintenance activities</b>	<p>1) Reclamation Plan</p> <p>A) Map</p> <p>B) cross sections – pre and post</p> <p>C) description of drainage and erosion control</p> <p>E) landscaping plan</p>	Final or Phased
	<p>2) perspective drawings of the site as seen from KVAs</p>	<p>Magnus?</p> <p>KVAs from County overlay—photos and a sketch overlay.</p>
	<p>3) cultural resource reconnaissance and historic surveys.</p> <p>A written description of the survey shall be submitted to and approved by the Gorge Commission Archaeologist</p> <p>Reconn surveys shall reflect the physical characteristics of the project area and the design and potential effects of the proposed use. They shall meet the following standards:</p> <ol style="list-style-type: none"> <li>1- Archival research</li> <li>2- Surface surveys</li> <li>3- Subsurface probes</li> <li>4- Archaeological site inventory forms to be submitted to SHPO</li> <li>5- A confidential report <ol style="list-style-type: none"> <li>a. Description of proposed use</li> </ol> </li> </ol>	<p>Roy &amp; Bob</p> <p>ORS358.653 publicly owner historic property</p> <p>New roadway into the quarry.</p> <p>OSMA survey, shovel probes &amp; record the old trailer.</p> <p>Do we need concurrence from SHPO before we submit the NSA?</p>

	<ul style="list-style-type: none"> <li>b. Description of the project area</li> <li>c. A list of documents and records examined</li> <li>d. A description of field works</li> <li>e. An inventory of cultural resources that exist within the project area with a map</li> <li>f. A summary of written comments</li> <li>g. A preliminary assessment of effect No effect for HCRH</li> <li>h. The applicant is responsible for recon surveys</li> <li>i. The Gorge Commission will conduct and pay for evaluations of significant for all evaluations of significance and Mitigation Plans for cultural resources discovered during the construction of large scale uses.</li> </ul>	
	<p>4) Written reports of field surveys to indentify sensitive (endemic) wildlife areas or sites and sensitive plants.</p> <p><b>Definitions Sensitive Plants species and Wildlife species.</b></p>	<p>Ken &amp; Ben</p> <p>Impacts to habitat but not to species.</p> <p>Need to check the site during June/July</p> <p>Memo</p>
<b>B) Siting Standard.</b>	<p>The proposal disposal site shall only be approved if the applicant demonstrates it is not practicable to locate disposal site outside the Scenic Area or inside an Urban Area. At a minimum, the applicant shall submit and feasibility and suitability analysis that</p>	<p>THIS NEEDS WORK!</p> <p>Stephen Hay—Kristen</p> <p>We currently store material at Corbett but it is only temporary.</p> <p>We are reclaiming this quarry and making it better. This is an enhancement in the area.</p>

	compares the proposed disposal site to existing or potential disposal sites located both inside and outside the Urban Area.	Look at Rowena and Chenoweth reclamations. Full reclamation will be completed within 25 years or until full capacity is reached. All the material is native. We will not use the quarry for any material outside of the NSA. Jordan Rd and Corbett are temporary stockpile sites and we will haul the material to Coopey Quarry for permanent disposal and reclamation.
<b>C) Scenic Resources Standards.</b>	Site more than 3 miles from the nearest KVA shall be visually subordinate as seen from KVAs. Interim compliance period nte 3 years.	NA
	2) Site less than 3 miles must be fully screened according to MCC 38.7035(B) 26 (a) a site plan requirement for such proposals pursuant to the this chapter have been	Within 3 miles. What are we evaluating--current condition vs. proposed reclaimed condition. Do we have to screen construction activities?
	(b) The area to be mined and the area to be used for primary processing, equipment storage, stockpiling etc associated with the use would be visually subordinate as seen from any Key Viewing Areas; and	Show with pictures.
	c) A reclamation plan to restore the site to a natural appearance which blends with and emulates surround landforms to the maximum extent practicable has been approved. At a minimum, a reclamation plan shall comply with MCC38.7035 (A)	Site plan will demonstrate this.
	<b>38.7035(A)</b> For all proposed development the determination of compatibility with the landscape setting shall be based on the	



	information submitted in the site plan	
	d.) A written report on a determination of visual subordination has been completed with findings addressing extent of visibility of proposed mining activities from KVAs	Need a written report.... Magnus & Sarah
	<p>1. A list of KVAs from which exposed mining surfaces (and associated facilities and activities would be visible).</p> <ul style="list-style-type: none"> <li>• An estimate of surface area of exposed mining surfaces visible from KVAs</li> <li>• The distance from KVA and linear distance along the KVAs from which the mining activities can be viewed.</li> <li>• The slope and aspect of mining surfaces relative to the portions of the KVA from which they are visible.</li> <li>• The degree to which potentially visible mining surfaces are screened from KVA by existing vegetation including winter screening considerations.</li> <li>• The degree to which potentially visible mining surfaces would be screened by new plantings, berms etc and the appropriate time framed to achieve such results.</li> <li>• The area to mined and the area used for primary processing, equipment storage, stockpiling etc, associated with the use would be fully screened from KVAs</li> </ul>	
	A reclamation plan to restore the area to a	

	natural appearance which blends with and emulates surround lands from has been approved. At minimum, the reclamation plan shall comply with MCC 38.7035 (A) 6 and 7	
	All reclamation plans for new quarries or expansion of existing quarries shall be sent to the appropriate state reclamation agency.	
	28) An interim time period to achieve compliance with visual subordination requirements for expansion and development of new quarries located more	